

Equality Impact Assessment: Conversation Screening Tool

The Council is legally required by the Equality Act 2010 to evidence how it has considered its equality duties in its decision-making process.

The Council must have due regard to the need to -

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to -

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

A link to the full text of [s149 of the Equality Act 2010](#) which must be considered when making decisions.

What is being reviewed?	<p>Improvement of Environment in Poole Park – trial closure of Park Entrance (adjacent to Twemlow Avenue/Whitecliff) to motor traffic.</p> <p>A trial closure of the Twemlow Avenue entrance to Poole Park to motor vehicles. The closure was in place for a 28 – day period from 17 January 2024 until 13 February 2024 with a preceding 2-week notification period from 3 January 2024.</p> <p>Following evaluation of the trial and consultation responses a decision is now to be made as to whether the trial closure becomes permanent or not, or if alternative options should be implemented to reduce vehicle numbers. The trial closure has remained in place while decisions are made.</p>
What changes are being made?	<p>The trial was intended to substantially reduce motor traffic using the park as a through route. The aim of the closure was to improve the environment and amenity of Poole Park. Previous consultation has established that the enjoyment of the park for some is reduced by the impact of through motor traffic. The intention is to make Poole Park a better place for its users with wider benefits for the environment, climate change, biodiversity and active travel.</p> <p>Closing an existing motor traffic route will allow those affected to respond and any equality impacts that arise identified. A closure to all vehicles already happens on a time limited basis between 7:30 and 10:00 am Mondays to Saturdays.</p> <p>The trial extended this closure to motor vehicles at all times using the Whitecliff Road access point. Access to the park by active means of travel – walking, cycling and wheeling - is unaffected.</p> <p>The trial gave park users and residents the opportunity to have their say via a consultation at the same time as the trial is undertaken.</p>

	<p>Perspectives on the trial closure were therefore provided based on actual conditions with people and organisations affected having experience of circumstances before and during the trial. This now allows the evaluation of the impacts of the trial, including the wider transport network.</p> <p>The roads in Poole Park are not adopted highway and are therefore managed by Environment Services.</p> <p>Traffic data, previous consultation responses, the strategic management of green spaces, highways and the wider network are also considered alongside the public consultation findings.</p>
Service Unit:	Environment Services
Participants in the conversation:	<p>Martin Whitchurch – Strategic Lead for Greenspace and Conservation Richard Barnes – Service Unit Equality Champion and part of Sustainable Travel Team. Lisa Stuchberry and Jo Hansell – Research & Consultation Insights team Philip Patrick-Valentine – Environment Service Unit Equality Champion DOTS Disability group.</p>
Conversation date/s:	<p>Original EIA was created 15th December for the trial only. This has developed through the trial period and now with the consultation results in March 2024 to the full review of the impact of the closure to inform future decision making. Review with insight team following consultation outcome report – 8 March 2024.</p>
Do you know your current or potential client base? Who are the key stakeholders?	<ul style="list-style-type: none"> • People who use Poole Park for recreation. • Drivers and passengers who currently either access the park or drive through. • People who access the park using active travel – walking, cycling and active travel. • Businesses who operate within the park and their customers. • Residents and all users of the highway in the surrounding area.
Do different groups have different needs or experiences?	<p>Parallel to the trial closure, a 4-week consultation took place from 17 January until 13 February 2024. Signs were put up in the park promoting the consultation, an on-line survey was available as well as paper copies in BCP Council libraries and in the Ark Cafe – in the park. The consultation was promoted on the Council's social media channels and press releases.</p> <p>5,392 responses were received, this is a high number compared to other consultations and the trial attracted considerable media and social media interest.</p> <p>The consultation analysis can be found here that includes analysis by respondent profile and against BCP census data. A summary report is here.</p> <p>Poole Park is well used by local people, visitors to the area, businesses, charities and for a wide range of uses. We do not hold specific profile data of park users, but do know that the wide range of facilities, sports and</p>

	<p>leisure groups, catering and quality of green space attracts people of all ages and abilities.</p> <p>Previous Park improvements have included creating a sensory garden and a 'memories space' that were designed with more elderly people and those suffering from illnesses in mind. Creating spaces to sit, reflect, share memories and be in a high-quality space is some of the specific appeal of Poole Park.</p> <p>Alongside the consultation, BCP Council specifically engaged DOTS Disability, a community interest company for disabled people run by disabled people, to undertake a review of the trial traffic management proposals in Poole Park. The group were all familiar with the park, used it frequently and understood the basis for the trial closure and public consultation.</p> <p>The group of six members, all with a range of disabilities and representing other members of the group with a wide range of disabilities, were introduced to the trial, the consultation and considered the issues. They surveyed the park and considered their responses following a site visit and assessment of the impact in accessing the parks facilities, the parking areas and trying to appreciate all users' needs.</p> <p>The visit was undertaken in February 2024 when the trial closure was still in place. Their summary comments are:</p> <ul style="list-style-type: none"> • Poole Park was described as a popular destination for disabled people. • Any additional journey times resulting from the closure of Twemlow Gate at all times, were not seen as an issue by the participants. • The Disabled participants who took part in the visit had no objection to a permanent closure of the entrance - from an access perspective. • Disabled drivers who make through journeys will be disadvantaged by a slightly longer journey time – in the same way as non-disabled drivers. • Reduced through traffic – if the closure is made permanent, will benefit the park environment including disabled visitors in exactly the same way as it will for visitors who are not disabled. <p>DOTS Disability report (here)</p> <p>the respondent profile shows some differences comparing the protected characteristics of respondents (where declared) compared to the baseline BCP population from the 2021 census. Any differences highlighted are based on evidence from the consultation and to fulfil our obligations under the Equality Act they are set out noting that they may cause wider discussion.</p> <p>The survey has higher representation of all age groups over 45, with particularly high representation from ages 56-64 and over 75. Respondents with a disability are strongly represented making up 30% of respondents compared to 21% of the census population.</p>
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Minority ethnic groups have low representation in the survey; white British respondents making up 95% of respondents compared to 83% of the census population.

36% agreed with the extended closure and 63% disagreed.

The profile of people who were more likely to agree -

Characteristic	% in agreement (overall 36%)
Age, 35-44	47%
Age, 45-54	42%
Age, 25-34	42%
Men	44%
No Disability	48%
Ethnicity – other white	59%
No religion	50%

The profile of people that were more likely to disagree

Characteristic	% in disagreement (overall 63%)
Disability – limited a lot	83%
Disability – limited a little	75%
Age – 65-74	65%
Age 75+	73%

Respondents were given the opportunity to describe the impact the closure would have on themselves and their use of the park in a free text comments box. There were differences in mention of the various descriptions of impact according to protected characteristic, where this impact is significant it is included in the following table.

Description of Impact	Total number of free text responses mentioning impact	Characteristics (Showing significantly higher response to description of impact)
More traffic/congestion elsewhere	1036	Age 65-74 and 75+ Female Have a disability
Longer journey time/travel further	630	Age 75+ Female Have a disability.
Negative impact on elderly/disabled/vulnerable groups	610	Age 65-74 and 75+ Female Have a disability
Safer for pedestrians and cyclists	561	Age under 25,25-34 and 35-44 Not have a disability

	More pleasant place to visit/improved experience	482	Age 35-44, 45-54 Male Not have a disability
	Park should not be a rat run/too much traffic	474	Age 35-44, 45-54 Male Not have a disability
	More difficult to access park/difficulty of access	443	Age 75+ Have a disability
	Increased emissions/pollution/poorer air quality	433	Have a disability
	Enjoy driving through the park/visiting by car/pleasant route	397	Age 55-64 Female Have a disability
	<p>53% of responses were from women, and 47% by men, these closely align to BCP population as per the 2021 census, as well as being very evenly split. 44% of males agreed with the trial, compared to the overall sample of 36%.</p> <p>Some free text comments identified that women may feel less safe at night owing to the lack of passing vehicles that may provide some casual supervision of the park and its users.</p> <p>The park is well lit, with streetlights on all the roads, in car parks and around the cricket pitch. The park has high visitor numbers, especially in the warmer months, with frequent dog walkers, joggers and other recreation groups such as cricket, tennis, organised walks and personal trainers. These groups and users may increase in number with quieter park roads. The perception of less safe would need to be trialled and tested over a longer period to consider if that occurs.</p>		
Will this change affect any service users?	Poole Park is a free facility for everyone to use. Therefore, all users are in scope of the changes described here.		
What are the benefits or positive impacts of the change on current or potential users?	<p>Respondents as part of the consultation were able to describe how the trial closure would impact them and their use of the park:</p> <p>Safer for pedestrians/cyclists/less dangerous driving. With fewer vehicles using Poole Park, there will be a perceived reduction in danger from vehicles to pedestrians, cyclists and amongst the young, elderly and some disabled users.</p> <p>Poole Park is not Public Highway. The road safety team only receive data from the Police where a collision has occurred on Public Highway, therefore data is not held about any collisions that have occurred specifically in Poole Park.</p> <p>With no accident data available, or anecdotal accounts of significant accidents or incidents, it is therefore only appropriate to consider perceived safety.</p>		

	<p>Previous park consultations have highlighted that people consider vehicles in Poole Park to pose a risk and they cited that reduced traffic volumes would improve child safety. This is an example of how reducing traffic will be of benefit.</p> <p>More pleasant place to visit/improved experience. Park should not be a rat run/too much through traffic. A significant reduction in through traffic will provide environmental improvements with anticipated or perceived better air quality and less pollution within the park (however, there is no monitoring or evidence to baseline this against). Respiratory conditions disproportionately affect elderly, the very young and some disabled people. Reducing the detrimental impact of through motor traffic should deliver positive outcomes for these groups.</p> <p>Significantly less through motor traffic will provide an improved amenity for other transport modes – walking, cycling and wheeling. This will benefit the profile of people without access to cars by providing a safer environment for travel, reducing congestion and retaining journey options for active travel through the park. This is especially true for families, people using the space for recreation and encouraging children or less confident cyclists for example to feel safe in using Poole Park.</p> <p>Park users will feel safer and enjoy a quieter park environment with less vehicle movements taking place. This will encourage more recreation and active use of the space, specifically, the more elderly and those with limited mobility should feel more able to move through the park; parents will feel more secure in their children playing or moving through; and all wheeled users will have more time and space when using the roads.</p> <p>The commercial concessions in the park do not object to the proposal as it does not restrict access. Similarly, the park stakeholders have not made representation from their organisations with any objection to the closure.</p>
<p>What are the negative impacts of the change on current or potential users?</p>	<p>Respondents, as part of the consultation, were able to describe how the trial closure would impact them and their use of the park.</p> <p>More traffic/congestion elsewhere Longer journey time/need to travel further Negative impact on disabled/elderly/vulnerable groups More difficult to access park/restriction of access Increased emissions/pollution/poorer air quality Enjoy driving through park/visiting by car/pleasant route.</p> <p>This was considered to have a negative impact for the more elderly (over 65) or those with a disability owing to the closure. These are the two principle protected characteristics to take account of.</p> <p>People who drove or were passengers who previously used the Twemlow Avenue gate to travel through will have their usual journey pattern impacted. Where alternative routes are taken, there potentially could be an impact on traffic patterns affecting other journeys and residents in these areas.</p>

	<p>Journey times for alternative routes could be longer with economic impacts and displacement of through motor traffic from the park to surrounding areas.</p> <p>A theme in some responses was the enjoyment of the park as part of a through journey by car, noting that for some, people unable to walk or cycle, this was their only means of access. The nature of the trial closure meant such through journeys were compromised and this point was made by some disabled and elderly people.</p> <p>Increased emissions/pollution and poorer air quality may affect the surrounding area through any traffic displacement. This would have a negative impact on groups disproportionately affected by respiratory conditions including very young people, elderly people and some disabled people.</p> <p>Where changes are made to road layouts studies have shown that people react in different ways. A Transport For All study, 'Pave the Way' January 2021, covered the impact of Low Traffic Neighbourhoods (LTN's) on disabled people. It mentioned that 'Any change implemented which affects the movement of vehicles and pedestrians as well as flow of traffic will inevitably have some sort of impact on disabled people who feel the changes more strongly due to limited alternative options for travel'. The report also mentioned that change itself can be an access barrier.</p> <p>The other protected characteristics were considered and no negative impacts were identified.</p>												
Will the change affect employees?	<p>Some BCP Council employees, especially those who work at the Poole Hub office, may use the park as a through route. They will be affected by a closure and having to alter their route.</p> <p>Employees of businesses in Poole Park will be similarly affected.</p>												
Will the change affect the wider community?	<p>Poole Park attracts users both locally and from a wider area, including tourist visitors, so changes will cover the wider community and some of the through journeys made will originate over a wider area.</p> <p>There were some differences in agreement/disagreement with the trial and the extent to which listed impacts were raised depending on where people lived. This is set out below:</p> <p>Note: Poole Park is BH15</p> <table border="1"> <thead> <tr> <th>Description of impact</th><th>Postcodes which raised to a greater extent.</th></tr> </thead> <tbody> <tr> <td>More Traffic/congestion elsewhere</td><td>BH14</td></tr> <tr> <td>Longer journey time/travel further</td><td>BH14</td></tr> <tr> <td>Negative Impact on disabled/elderly/vulnerable groups</td><td>BH16, BH17, BH18</td></tr> <tr> <td>Safer for pedestrians/cyclists/less dangerous driving</td><td>BH15</td></tr> <tr> <td>More pleasant place to visit/improved experience</td><td>BH15</td></tr> </tbody> </table>	Description of impact	Postcodes which raised to a greater extent.	More Traffic/congestion elsewhere	BH14	Longer journey time/travel further	BH14	Negative Impact on disabled/elderly/vulnerable groups	BH16, BH17, BH18	Safer for pedestrians/cyclists/less dangerous driving	BH15	More pleasant place to visit/improved experience	BH15
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	Park should not be a rat run/too much traffic	BH15
	More difficult to access park/restriction of access	BH18, BH12, BH13
	Increased emissions/pollution/Poorer air quality	BH13/BH14
	Enjoy driving through the park/visiting by car/pleasant route	BH16, BH21, BH18, BH13, BH17
	<p>Differences in views depending on postcode could be due to different levels of car ownership – extent of social deprivation also needs to be considered. To an extent those from areas with higher levels of deprivation with lower car ownership are more likely to support the trial closure.</p> <p>The top two comments from those that disagreed concern more traffic and longer journey times on surrounding roads. The traffic data (survey results and summary here) on park usage pre and during the trial suggest that:</p> <ul style="list-style-type: none"> • A seven-day average from automated counts on Parkstone road show there are c. 21,000 vehicle movements per day. There was a minor increase in average daily vehicular traffic on Parkstone Road of 2.07% during the trial, amounting to an additional 432 movements, suggesting a negligible impact on Parkstone Road. • Journey times to travel around Poole Park on the highway network are typically quite short: <ul style="list-style-type: none"> ○ Morning 3-6 minutes ○ Afternoon 4-8 minutes <p>The impact of closing an entrance to Poole Park therefore has to be considered in the context of the relatively small amount of time it takes to navigate the surrounding highway.</p>	
What mitigating actions are planned or already in place for those negatively affected by this change?	<p>Mitigating actions will only be relevant if the trial is made permanent. BCP Cabinet will make that decision in May 2024 and the report will bring forward a recommendation to retain the closure, as trialled during the consultation. This is supported as the preferred option as it:</p> <ul style="list-style-type: none"> • is the most effective place to reduce through traffic with no significant impact on the surrounding road network. • helps to create a reduced traffic environment in Poole Park, encourages active travel, play, recreation and enjoyment of Poole Park. • is simple to implement and will be easily understood by park users and local people using the local road network having already been in use since mid-January • is low cost and can lead to other improvements in Poole Park <p>Some responses in the consultation cited issues in being able to access the park, however access to Poole Park by vehicles was still possible, but not through the Whitecliff entrance.</p> <p>The DOTS disability report recommended a turning circle be placed on the park side of the Whitecliff gate. This would facilitate car journeys within the park to allow enjoyment as part of a car journey for people unable to travel</p>	

	<p>within the park by other ways. If the closure is adopted a turning circle or other adaptive design work will be brought forward.</p> <p>Various alternative options and solutions to provide a reduction in through traffic have been raised by the consultation and by officers in response to the feedback. These are presented in Cabinet Report Appendix 5. They have not been brought forward here as they provide a similar outcome, i.e. reducing vehicle access to the park; and therefore, effect those with protected characteristics in similar ways, such as perceived longer journey times or congestion on surrounding roads.</p> <p>Mitigating Actions:</p> <ul style="list-style-type: none"> • Assess the provision of disabled parking in Poole Park • Redesign the park layout between Middle Gate and Whitecliff entrance to enhance disabled parking spaces, extend these where appropriate from above action, provide more dropped kerbs, include marked bays with extended loading areas. • Poole Park remains accessible to all users, with any form of limitation to vehicles to reduce through traffic, access will still be available to drive in to the park and access car parking spaces. • As a popular space located in the town centre, Poole Park has finite parking and very limited space to increase parking spaces. As a leisure and recreation destination, use of active travel to Poole Park is encouraged and supported. The surrounding town centre parking provision already supports the park at busiest times when parking is at capacity. This should be promoted and sign-posted appropriately to support the user/customer journey in to Poole Park. <p>The alternative option to the recommendation and the trial is to remove the closure. This would allow vehicles to use Poole Park as they have historically done so and would not bring any benefits to park users.</p>
<p>Summary of Equality Implications:</p>	<p>There may be some negative impacts on the more elderly and disabled if a road closure is made permanent, such as longer journey times to Poole Park, however the evidence analysis of the responses suggest this is not significant in terms of journey time/congestion, and the park does remain accessible for all users. The traffic data evidence supports these findings, for instance only increasing vehicles on Parkstone road by 2%, or 432 vehicles.</p> <p>Similarly, the assessment by DOTS disability and consideration of the impacts on the more elderly or disabled suggests any negative impacts on some users, such as longer journey times and congestion, but these are outweighed by the improvement to the park environment that comes from reducing traffic volumes.</p> <p>The alternative option is to re-open the Park to through traffic, however this does not align with the aims of the trial, findings and strategic intent. A range of options within Poole Park to create a reduction in through traffic have been analysed and considered with the trial closure point favoured.</p> <p>The consultation has not revealed any further impacts on other groups with protected characteristics and therefore summarise that the road closure does not have a significant impact on users of Poole Park.</p>

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Appendix 1 Summary of relevant previous public engagement in Poole Park

Headlines from previous consultation and engagement.

BCP Council ‘Rethinking the future of parks and open spaces’ public consultation, Insights Team report July 2021. Residents were asked ‘what would they change about one open space in the BCP area’.

“The most commonly mentioned space was Poole Park (55 times) and more than half of these mentioned traffic and vehicles (32 times)”. Specific comments:

- “Poole Park, please stop through traffic at all times...”
- “Stop cars driving through Poole Park (as done previously in Meyrick Park and Kings park).”
- “Poole Park: remove through traffic”
- “Poole Park should be traffic free...”
- “I would stop through traffic in Poole Park...”

Poole Park Life Evaluation report, Resources For Change consultants, employed to deliver the evaluation and monitoring of the Poole Park Life project, November 2021.

Summary comments:

“There was general feeling that through traffic should be further reduced in the park, if not eliminated, with one saying, “It’s a park not a road”. Concern was expressed that not enough had been done for pedestrians and that many of the paths along the improved road and around the lake had not been improved.”

Survey Findings:

“People were keen that the improvements and the activities in the park did not stop now the project had come to an end. Their aspirations were varied but key themes emerged as follows.

- The most common response to this question was to ‘maintain well what we have got’. There was a sentiment in the responses that past improvements had not always been well maintained and therefore this was an area for future improvement.
- **Car/ roads/ access and parking was perhaps the biggest area of comment in this section. As has already been mentioned there is a range of opinions on the topic but there seem to be a consensus around the idea that this issue was not yet satisfactorily addressed and work in this area is needed to continue. There is a strong feeling that this is unfinished business.**

- Miniature Steam Train. There used to be a narrow-gauge railway operating in the park. This was closed in 2018 and is a much-missed attraction.
- Ongoing support for volunteers and a continued programme of events was also seen as important as these had been popular activities during the life of the project and were seen as providing a key link with the local community.