

KCC - Growth, Environment and Transport Directorate (GET).

Equality Analysis / Impact Assessment (EqIA) template

Directorate/ Service:

Name of decision, policy, procedure, project or service: Kent Active Travel Fund: Folkestone to Lydd – the Dymchurch missing link

Pathway of Equality Analysis:

Summary and recommendations of equality analysis / impact assessment

Context

Kent County Council has ambitious targets for growth, and as a County Council we recognise that transport infrastructure and the environment are vital to creating sustainable developments and encourage people to live, work and play in Kent.

The ability to travel quickly and safely to our destinations requires a transport network that provides a variety of travel choices that supports a growing population. As such, we have developed initial concept designs in five locations within Kent which seek to create a safer environment for both walking and cycling to offer a real choice to our residents about how they can travel throughout the County. We have received funding for the following five proposed Schemes, which are still very much in an early design stage:

- Canterbury: Littlebourne Road – City Centre;
- Folkestone: Central Rail Station – Cheriton;
- Margate: Birchington – Westgate;
- Folkestone: Hythe – Dymchurch; and
- Gravesham: Gravesend – Northfleet.

The proposed Schemes aim to encourage and enable active travel, which means walking or cycling as a means of transport rather in addition to leisure purposes – an attractive and realistic choice for short journeys. It can benefit health and wellbeing by incorporating physical activity into everyday routine as well as reduce the number of vehicles on the road and improve air quality.

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1

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We believe these improvements will enable local support for active travel and encourage future investment which will:

- Support our local high streets and businesses by increasing footfall and making efficient use of our road space;
- Address public health crises in our communities by enabling our residents to get active and stay healthy, and get their children walking and cycling to school;
- Encourage cycle friendly streets and public spaces which encourages sustainable tourism;
- Provide a variety of safe and efficient means of transport; and
- Improve air quality and create more pleasant and attractive places to live.

Aims and Objectives

The proposed Scheme (shown on Figure 1) aims to create a missing link in the cycling network between Folkestone and Lydd, the new cycle facility will connect to an existing shared use facility northward towards Folkestone and southwards via Dymchurch Promenade. This will connect Folkestone with Romney, New Romney and Lydd via Dymchurch Promenade and minor roads. The majority of the route is classified as an A-road.

All interventions are proposed to be permanent, subject to feasibility, statutory consultation and delivery. These interventions are shown in the available proposed Scheme concept plans showing context maps and proposed interventions; these proposed Scheme plans are available on the consultation section of KCCs website.

Measures could include:

- Safe, dedicated space for cycling on the A259, connecting to the existing shared-use path to Folkstone in the north, and Dymchurch in the south;
- Junction improvements to give pedestrians and cyclists priority at certain locations;
- Network of signage throughout the area for cyclists and pedestrians; and
- The route length of the proposed Scheme is 0.95 miles (1.54km).

Summary of equality impact

There are likely to be a mixture of positive and negative impacts on Protected Groups resulting from the proposed Scheme. Until the design is developed in more detail it is an initial screen of these impacts that is required, however it is currently thought that the impacts are likely to be felt on the following Protected Groups:

- Age;
- Disability;
- Sex (including gender);
- Religion and Belief; and
- Pregnancy and Maternity.

Assuming that the mitigation outlined in the sections below is implemented it is judged that the proposed Scheme can **adjust and continue** with minor implications on Protected Groups.

Adverse Equality Impact Rating

I have found the Adverse Equality Impact Rating to be **Low**

GET Document Control

Revision History

Version	Date	Authors	Comment
V0.2	04/12/2020	Rebecca Dipoti (Author), WSP	
		Sophie Collins (Review), WSP	
		Gavin Lewis (Quality Assurance), WSP	
V1 (this should be assigned to the version the Director signs off)			

Document Sign-Off (this must be both the relevant Head of Service and the relevant Director)

Attestation



I have read and paid due regard to the Equality Analysis/Impact Assessment. I agree with the actions to mitigate any adverse impact(s) that has /have been identified.

Name	Signature	Title	Date of Issue
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Date Document Updated 08/12/2020

4

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Tim Read		Head of Service	7/12/20
Simon Jones		Director	7/12/20

Part 1 - Screening

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Social Baseline

Introduction

The following local social profile for the district of Shepway has been compiled from publicly available data to provide context and to inform the assessment. Data for Shepbury has been compared with the average for England / Wales. This comprises information on the following:

- Protected characteristic groups;
- Local community facilities and public transport; and
- Local community facilities and facilities relevant to Protected Groups.

A 1km study area has been used to identify facilities relevant to Protected Groups in line with professional judgement and experience on similar schemes.

The proposed Scheme is located within the Shepway, within the local authority of Kent County Council which had a population of 1,581,600 in 2019¹.

Protected characteristic profile

Data from the Office of National Statistics (ONS) has been gathered on the following protected characteristics from Section 4 of the Equality Act 2010²:

¹ NOMIS (2019), Labour Market Profile – Kent. Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1941962885/report.aspx> (Accessed: 25 November 2020).

² HM Government (2010) The Equality Act 2010. Available at: <https://www.gov.uk/guidance/equality-act-2010-guidance> (Accessed: 25 November 2020).

- Age;
- Disability;
- Race;
- Religion or belief;
- Sex / gender;
- Sexual orientation; and
- Deprivation.

Due to the lack of publicly available data, certain protected characteristics, including gender reassignment, marriage and civil partnership and pregnancy and maternity have not been included in the assessment. Although not required under the Act, the social profile also includes data for deprivation, as it provides a measure of a combination of social-economic matrices and can be used as an indicator for vulnerable groups.

Ethnicity and religion profile

The percentage of each ethnicity in the Shepway District as measured by ONS, and as outlined in the 2011 Census, is presented in **Table 1**. It shows that the percentage of the population classified as White British in Shepway (90.8%) is higher than the England and Wales average percentage (80.5%). The percentages of population for other ethnicities in Shepway are generally lower than the England and Wales average, except for those classified as “White: Gypsy or Irish Traveller” and “Asian/Asian British: Other Asian”. This indicates that Shepway is less diverse when compared to the general population in England and Wales.

Table 1 Ethnicity breakdown of Shepway and England and Wales (2011)³

Ethnic group	Shepway		England and Wales	
	Total no.	% of total*	Total no.	% of total*
White: English/welsh/Scottish/Northern Irish/British	98,029	90.8%	45,134,686	80.5%
White: Irish	745	0.7%	531,087	0.9%
White: Gypsy or Irish Traveller	164	0.2%	57,680	0.1%
White: Other White	3,277	3.0%	2,485,942	4.4%

³ NOMIS (2011), Ethnic group. Available at: <https://www.nomisweb.co.uk/census/2011/ks201ew> (Accessed: 25 November 2020).

Mixed/Multiple Ethnic Groups: White and Black Caribbean	387	0.4%	426,715	0.8%
Mixed/Multiple Ethnic Groups: White and Black African	149	0.1%	165,974	0.3%
Mixed/Multiple Ethnic Groups: White and Asian	420	0.4%	341,727	0.6%
Mixed/Multiple Ethnic Groups: Other Mixed	311	0.3%	289,984	0.5%
Asian/Asian British: Indian	413	0.4%	1,412,958	2.5%
Asian/Asian British: Pakistani	93	0.1%	1,124,511	2.0%
Asian/Asian British: Bangladeshi	226	0.2%	447,201	0.8%
Asian/Asian British: Chinese	281	0.3%	393,141	0.7%
Asian/Asian British: Other Asian	2,686	2.5%	835,720	1.5%
Black/African/Caribbean/Black British: African	277	0.3%	989,628	1.8%
Black/African/Caribbean/Black British: Caribbean	130	0.1%	594,825	1.1%
Black/African/Caribbean/Black British: Other Black	51	0.0%	280,437	0.5%
Other ethnic group: Arab	64	0.1%	230,600	0.4%
Other ethnic group: Any other ethnic group	266	0.2%	333,096	0.6%

*Note: Percentages may not sum exactly due to rounding.

The proportion of different beliefs in Shepway and England and Wales are provided in **Table 2**. It shows that the majority of the population in Shepway identifies as Christian (62.3%) and the second largest group is no religion (26.5%). It also indicates that the population in Shepway has a higher percentage to the England and Wales average (59.3%) that identifies as Christian. This data suggests that there are no minority groups under this protected characteristic group which are more highly represented and need to be given additional consideration within this assessment.

Table 2 Percentage of People Belonging to Specific Faiths in Shepway and England and Wales (2011)⁴

Religion	Shepway		England and Wales	
	Total no.	% of total*	Total no.	% of total*
Christian	67,296	62.3%	33,243,175	59.3%
Buddhist	962	0.9%	247,743	0.4%
Hindu	1,551	1.4%	816,633	1.5%
Jewish	78	0.1%	263,346	0.5%
Muslim	796	0.7%	2,706,066	4.8%
Sikh	34	0.0%	423,158	0.8%
Other religion	506	0.5%	240,530	0.4%
No religion	28,575	26.5%	14,097,229	25.1%
Religion not stated	8,171	7.6%	4,038,032	7.2%

*Note: Percentages may not sum exactly due to rounding.

Age profile

The age profile in Shepway and England and Wales is provided in **Table 3** below. It shows that when compared to the England and Wales average, the percentage of the population in Shepway is generally lower for ages ranging between 0 and 44; and higher for ages ranging between 45 and above 90.

Table 3 Percentage of People Belonging to Specific Faiths in Shepway and England and Wales (2011)⁵

Age range	Shepway		England and Wales	
	Total no.	% of total*	Total no.	% of total*
0 – 4	5,996	5.6%	3,496,750	6.2%
5 – 7	3,333	3.1%	1,927,039	3.4%
8 – 9	2,242	2.1%	1,208,672	2.2%
10 – 14	6,331	5.9%	3,258,677	5.8%
15	1,307	1.2%	687,994	1.2%
16 – 17	2,796	2.6%	1,391,235	2.5%
18 – 19	2,487	2.3%	1,460,156	2.6%

⁴ NOMIS (2011), Religion. Available at: <https://www.nomisweb.co.uk/census/2011/ks209ew> (Accessed: 25 November 2020).

⁵ NOMIS (2011), Age. Available at: <https://www.nomisweb.co.uk/census/2011/ks209ew> (Accessed: 125 November 2020).

20 – 24	6,200	5.7%	3,807,245	6.8%
25 – 29	5,591	5.2%	3,836,609	6.8%
30 – 44	19,532	18.1%	11,515,165	20.5%
45 – 59	21,597	20.0%	10,886,135	19.4%
60 – 64	8,142	7.5%	3,377,162	6.0%
65 – 74	11,593	10.7%	4,852,833	8.7%
75 – 84	7,413	6.9%	3,115,552	5.6%
85 – 89	2,141	2.0%	825,671	1.5%
90+	1,268	1.2%	429,017	0.8%

*Note: Percentages may not sum exactly due to rounding.

Sex Profile

Table 4 presents the 2011 Census gender profile in Shepway and England and Wales. It indicates that the percentage of males (all ages) and females (all ages) in Shepway is similar to the England and Wales average in 2011, , therefore there are not likely to be any significant number of additional receptors of either sex which could be affected by the proposed Scheme.

Table 4 Sex profile in Shepway and England and Wales (2011)⁶

Sex	Shepway		England and Wales	
	Total no.	% of total	Total no.	% of total
Male	53,135	49.2%	27,075,912	49.2%
Female	54,834	50.8%	28,502,536	50.8%

Disability

A total of 21.1% (22,718) of the population in Shepway are living with a long-term health problem or disability, which is a higher proportion than the England and Wales average of 17.9%. A higher proportion of the population in Shepway (10.0%) identify as having a long-term health problem or disability which limits their day to day activities a lot, when compared with the England

⁶ NOMIS (2011), Usual resident population. Available at: <https://www.nomisweb.co.uk/census/2011/ks101ew> (Accessed: 25 November 2020).

and Wales average (8.5%).⁷ Although the number of those with disabilities is higher than the national average, a significant number of additional receptors are unlikely to be affected by the proposed Scheme.

Index of Multiple Deprivation

The Indices of Multiple Deprivation (IMD) 2019 use a combination of information relating to income, employment, education, health, skills and training, barrier to housing and services, and crime to create an overall score of deprivation. These scores are then used to rank specific geographical extents, out of a total of 32,844 LSOAs in England. A low rank indicates higher, relative deprivation; hence the most deprived area is ranked 1. IMD data is broken down into smaller areas, known as Lower-layer Super Output Areas (LSOAs), which are a standard statistical geography designed to be of a similar population size, with an average of approximately 1,500 residents or 650 households.

The proposed Scheme lies within one LSOA (Shepway 009B) and immediately adjacent to another to the south⁸ (Shepway 009A).

- Shepway 009B is ranked 17,833, putting it in the 50% least deprived neighbourhoods in the country. Across the seven domains of deprivation, Shepway 009B has a range of deprivation scores. It is amongst the 30-40% least deprived neighbourhoods in the country for five domains of deprivation (“Income Deprivation”, “Health Deprivation and Disability”, “Crime”, “Living Environment” and “Income Deprivation Affecting Children”). By contrast, it is in the 50% most deprived neighbourhoods in the country for “Employment Deprivation” and “Education, Skills and Training Deprivation”, and in the 10% most deprived neighbourhoods for “Barriers to Housing and Services”.
- Shepway 009A is ranked 11,827, putting it in the 40% most deprived neighbourhoods in the country. Across the seven domains of deprivation, Shepway 009A has a range of deprivation scores. It is amongst the 20-50% least deprived neighbourhoods in the country for “Income Deprivation”, “Living Environment Deprivation” and “Income Deprivation Affecting Children”. By contrast, it is in the 30-50% most deprived neighbourhoods in the country for “Employment Deprivation”, “Education, Skills and Training”, “Health Deprivation and Disability”, and “Crime”. It is in the 10% most deprived neighbourhoods for “Barriers to Housing and Services”.

The range in deprivation levels between the affected LSOAs within the proposed Scheme areas means that people living and working within the proposed Scheme area are likely to use and uptake the proposed Scheme in different ways (including host and source destinations and means of travel).

⁷ NOMIS (2011), Long-term health problem or disability. Available at: <https://www.nomisweb.co.uk/census/2011/dc3201ew> (Accessed: 25 November 2020).

⁸ Indices of Deprivation (2019), Indices of Deprivation. Available at: https://dclgapps.communities.gov.uk/imd/iod_index.html# (Accessed: 26 November 2020)

Public transport, pedestrian and cycling facilities

- There are approximately 19 bus stops within the 1km Study Area. There are 13 bus stops along the A250 Hythe Road / Dymchurch Road which lies on the proposed Scheme route, two bus stops on Burmarsh Road, two bus stops on Kingfisher Avenue and one bus stop on Grebe Crescent;
- Sustrans National Cycle Network Route 2 is located approximately 970m north of the proposed Scheme;
- There are pedestrian pavement provisions adjacent to the north bound carriageway along the length of the proposed Scheme;
- Sandwich to Rye cycle ride partially lies on the proposed Scheme;
- England Coast Path – Camber to Ramsgate lies on the proposed Scheme;
- Royal Military Canal – West Hythe to Hythe is located 915m north of the proposed Scheme;
- Royal Military Canal Path is located 935m north of the proposed Scheme;
- Hythe and the Royal Military Canal is located 935m north of the proposed Scheme;
- Byway 0135/HB75/1 is located immediately north of the proposed Scheme;
- Public Footpath 0135/HB71/1 is located 220m west of the proposed Scheme;
- Public Footpath 0135/HB72/4 is located 770m north west of the proposed Scheme;
- Public Footpath 0135/HB71/2 is located 770m north west of the proposed Scheme;
- Public Footpath 0135/HB72/6 is located 585m north of the proposed Scheme;
- Public Footpath 0135/HB73/1 is located 580m north of the proposed Scheme;
- Public Footpath 0135/HB72/3 is located 580m north of the proposed Scheme;
- Public Footpath 0135/HB72/2 is located 580m north of the proposed Scheme;
- Public Footpath 0135/HB72/5 is located 580m north of the proposed Scheme;
- Public Footpath 0135/HB84/1 is located 655m north east of the proposed Scheme;
- Public Footpath 0135/HB74/1 is located immediately north of the proposed Scheme;
- Public Footpath 0135/HB85/2 is located 915m north of the proposed Scheme;
- Public Footpath 0135/HB67/1 is located 935m north of the proposed Scheme; and
- Bridleway 0135/HB66/2 is located 935m north of the proposed Scheme.

Local Community Facilities and Facilities Relevant to Protected Groups

The following text outlines those community facilities and other facilities relevant to Protected Groups within the study area for the proposed Scheme, and are shown on Figure 1.

Date Document Updated 08/12/2020

12

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The residential areas likely to be affected are:

- Residents located immediately adjacent to the proposed Scheme, along the A259 Dymchurch Road; and
- Residents located in the estates off the A259 Dymchurch Road, which are accessed via Nickolls Road and Botolph's Bridge Road.

Pre-schools and nurseries

There is one pre-school within 1km of the proposed Scheme. Lullabies is located 685m north east of the proposed Scheme.

Primary schools

There is one primary school within 1km of the proposed Scheme. Palmarsh Primary School is located 660m north east of the proposed Scheme.

Secondary schools

There are no secondary schools within 1km of the proposed Scheme.

Higher education

There are no higher education campuses within 1km of the proposed Scheme.

GPs

There are no GP surgeries within 1km of the proposed Scheme.

Dentists

There are no dentist surgeries within 1km of the proposed Scheme.

Pharmacies

There are no pharmacies within 1km of the proposed Scheme.

Hospitals

There are no hospitals within the study area. The closest, the Royal Victoria Hospital (includes dementia services and chaplaincy services) is located approximately 9.3km north east of the proposed Scheme.

Care homes

There are no care homes located within 1km of the proposed Scheme.

Places of worship and cemeteries / burial grounds

There is one place of worship within 1km of the proposed Scheme. Hythe Holy Cross Church is located 606m north east of the proposed Scheme.

Local facilities

There are no food stores, food banks, post offices or mobility service facilities within 1km of the proposed Scheme.

Screening

Based on the proximity of facilities relevant to Protected Groups, the local social profile and the nature of the proposed Scheme, the proposed Scheme is considered to have a **Low Negative** impact during construction on the Age, Disability, Sex (including gender), Religion and Belief and Pregnancy and Maternity Protected Groups. This rating has been allocated because there are likely to be short-term and reversible negative impacts of the construction of the proposed Scheme on a small number of individuals from these groups, including temporary road closures and diversions, and delays to journey times. It is considered that these effects can be mitigated using the actions outlined in Part 3 and below.

It is also likely that there will be a **Medium Favourable** impact on the Age, Sex (including gender) and Pregnancy and Maternity Protected Groups during operation, because there are likely to be a large number of individuals in these groups affected by the changes, and the benefits are likely to be felt in the medium / long-term. A **Low Favourable** impact on the Deprivation, Disability and Religion and Belief Protected Group was identified; the benefits were considered to be lower for this group as the uptake of the proposed Scheme is unlikely to be as high, but there may be some benefits associated with the new segregated cycleway and improved crossing points.

There are not considered to be any positive or negative impacts (during construction or operation) on the Gender Identity / Transgender, Sexual Orientation, or Marriage / Civil Partnership Protected Groups due to the absence of a clear relationship between these groups and the proposed Scheme.

Could this policy, procedure, project or service promote equal opportunities for this group?

The proposed Scheme and the consultation process offers the potential for engagement with relevant stakeholder groups and to foster good relations with local organisations and communities.

Please note that there is no justification for direct discrimination; and indirect discrimination will need to be justified according to the legal requirements

Protected Group	You <i>MUST</i> provide a brief commentary as to your findings, or this EqlA will be returned to you unsigned			
	High Negative Impact	Medium Negative Impact	Low Negative Impact	High/Medium/Low Favourable Impact
Age	-	-	Yes, during construction. Impacts are likely to be felt on children attending Lullabies (pre-school) and Palmarsh Primary School. In addition, elderly people and school-aged children using bus stops could be adversely affected.	Yes, medium favourable impact during operation. The provision of safe cycleways could increase the proportion of children travelling to school by bike, and therefore provide health benefits for local children.
Disability	-	-	Yes, during construction. Disabled users of the bus stops along the A250 Hythe Road / Dymchurch Road would be adversely affected.	Yes, low favourable impact during operation. Disabled people would benefit from new and improved cycleways and traffic free routes.
Sex (including gender)	-	-	Yes, during construction. Impacts are likely to be felt on	Yes, medium favourable impact during operation.

			women who undertake education escort trips.	Women are likely to benefit from a new segregated cycleway and safer crossings to escort children to school by bicycle, or to provide leisure trips with infants, henceforth encouraging active travel.
Gender identity/ Transgender	-	-	No impacts are anticipated.	No impact predicted during construction or operation. There is no evidence or data to show that this group would be directly adversely or beneficially impacted by the proposed Scheme.
Race	-	-	No impacts are anticipated.	No impact predicted during construction or operation. There is no evidence or data to show that this group would be directly adversely or beneficially impacted by the proposed Scheme.

Religion and Belief	-	-	Yes, during construction. Adverse impacts are likely to be felt on visitors to Hythe Holy Cross Church due to disruption in access caused by closures and / or journey delays from diversions.	Yes, low favourable impact during operation. There may be some benefits to users who cycle to Hythe Holy Cross Church.
Sexual Orientation	-	-	No impacts are anticipated.	No impact predicted during construction or operation. There is no evidence or data to show that this group would be directly adversely or beneficially impacted by the proposed Scheme.
Pregnancy and Maternity	-	-	Yes, during construction. Impacts are likely to be felt on women who undertake education escort trips.	Yes, medium favourable impact during operation. Women are likely to benefit from a new segregated cycleway and safer crossings to escort children to school by bicycle, or to provide leisure trips with infants,

				henceforth encouraging active travel.
Marriage and Civil Partnerships	-	-	No impacts are anticipated.	No impact predicted during construction or operation. There is no evidence or data to show that this group would be directly adversely or beneficially impacted by the proposed Scheme.
Deprivation			No impacts are anticipated. There is no evidence or data to show that this group would be directly adversely or beneficially impacted by the construction of the proposed Scheme.	Yes, low favourable impact during operation. Poorer households are likely to use the cycling network already so any improvements would benefit them.

Part 2 - Full Equality Analysis /Impact Assessment

From the screening grid, identify the Protected Groups impacted

As a result of the Screening in Part 1, it is concluded that there is potential for the following protected characteristics to be indirectly affected at a low negative level:

- Age;
- Disability;
- Sex (including gender);
- Religion and belief; and
- Pregnancy and maternity.

It is anticipated that the following mitigation measures may further limit the impact on these Protected Groups and could improve uptake of the proposed Scheme. Further detail is also provided within Part 3. Additionally, an EqlA is iterative, and should any additional issues be raised through consultation these will be considered:

Information and Data used to carry out your assessment

The data sources used to identify baseline characteristics of the Study Area are referenced in full in Part 1 above, but include:

- The ONS - <https://www.ons.gov.uk/>
- NOMIS - <https://www.nomisweb.co.uk/>
- The National Travel Survey 2019:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906847/nts-2019-factsheets.pdf
- IMD mapping software: http://dclgapps.communities.gov.uk/imd/iod_index.html#
- Google Maps: <https://www.google.co.uk/maps>

Gaps identified include location-specific data relating to the Sexual Orientation and Gender Identity / Transgender Protected Groups, due to the absence of reliable sources of data on these groups at present.

Who have you involved consulted and engaged with?

The public consultation and programme for the schemes proposed under the Kent Active Travel Fund is as follows:

- 9 December 2020 – 19 January 2021: Undertake initial engagement to understand how people feel about walking and cycling improvements where they live, and to seek views on early ideas;
- January 2021: Review feedback and issue report to inform scheme development; and
- Summer 2021: Public Consultation to seek views on the scheme designs which have been developed.

A number of key stakeholders relevant to Protected Groups have been identified, and who will be consulted with as part of this process. This includes active travel and accessibility groups (for example Sustrans, Bikeability, Living Streets), professional road users (for example taxi companies) and transport operators, education facilities, healthcare facilities, places of worship and local resident and community groups.

Specific organisations relevant to the disability Protected Group also to be consulted with are as follows:

- Kent Association for the Blind;
- Hi Kent (Support for Deaf and Hard of Hearing People);
- Kent Learning Disability Partnership Board;
- Disability Information Service Kent; and
- Kent Autistic Trust.

This EqlA is a live document and will be updated on a regular basis, particularly in light of any comments which arise during consultation.

Analysis

Age

Lullabies pre-school is located 685m north east of the proposed Scheme on St George's Place, which is only accessible from the A259 Dymchurch Road. Any users travelling from the east will not be affected by the construction of the proposed Scheme, however those travelling from the west may experience some disruption in the form of closures and / or journey delays from diversions to enable improvements at the A259 Dymchurch Road and Botolph's Bridge Road junction. Given the temporary nature of the construction works, it is unlikely that pre-school aged children will experience high or medium negative impacts. In addition, it

is unlikely that pre-school children will be directly affected or will experience a disproportionate impact during operation and the proposed Scheme is likely to benefit pre-school school aged children and education escort who cycle to school.

Palmarsh Primary School is located to the north east of the proposed Scheme, and the majority of students are likely to reside in Palmarsh, and therefore will be unaffected by the proposed Scheme. However, if any students access the school from properties to the south via Dymchurch Road, there may be some temporary disruption during construction which could cause indirect impact. The operation of the proposed Scheme is unlikely to directly affect or have a disproportionate impact on primary school aged children. According to the National Travel Survey (NTS)⁹, 46% of children walk to school, with approximately 1% of primary aged children cycling to school. The average length and time of primary school trips is 1.6 miles (or 2.6km) so within the 1km study area. Therefore, there would likely be safety benefits of the proposed Scheme for those primary school aged children who cycle to school. The NTS also states that 46% of primary school aged children travel to school by car, for a number of reasons including traffic safety concerns. The provision of safe cycleways as a result of the proposed Scheme could therefore increase the proportion of children travelling to school by bike, and therefore provide health benefits for local children. The benefits could particularly be felt for poorer households who are much less likely to have access to a car¹⁰, and who have to cycle to school already.

Neither the construction or the operation of the proposed Scheme is likely to affect or have a disproportionate impact on secondary school aged children, given that there are no such facilities within 1km of the proposed Scheme.

Any changes to the access to the 13 bus stops along the A250 Hythe Road / Dymchurch Road as a result of the construction of the proposed Scheme might indirectly and disproportionately impact elderly people and school-aged children, who are more likely to use public transport than other age groups¹¹.

Should any changes to parking be required to accommodate the construction or the operation of the proposed Scheme, this has the potential to directly (in the case of designated disabled parking bays) or indirectly (in the case of general parking removed in the vicinity of relevant services) impact upon blue badge holders (including elderly residents who may have reduced mobility). Where this is the case, alternative provision would be made to mitigate against any disproportionate impacts.

⁹ National Travel Survey (2014) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/476635/travel-to-school.pdf (Accessed: 25 November 2020).

¹⁰ Office for National Statistics (2011) <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access> (Accessed: 25 November 2020).

¹¹ National Travel Survey (2020) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929992/annual-bus-statistics-year-ending-march-2020.pdf (Accessed: 25 November 2020).

Disability

There are not expected to be any direct disproportionate impacts from construction of the proposed Scheme on those with disabilities.

According to the DfT's report on Disabled People's Travel Behaviour and Attitudes to Travel (2017)¹², having a disability significantly increases the probability of travelling by bus. Therefore, any changes in access to the 13 bus stops along the A250 Hythe Road / Dymchurch Road, as a result of the construction of the proposed Scheme could indirectly and disproportionately impact upon disabled people and those with limited mobility.

Once the proposed Scheme is operational, disabled residents of the area would likely benefit from the proposed Scheme. New and improved cycleways and traffic free routes will help to facilitate exercise particularly for those who may have felt they cannot cycle in their area due to a lack of access to safe cycle routes.

Should any changes to parking be required to accommodate the construction or the operation of the proposed Scheme, this has the potential to directly (in the case of designated disabled parking bays) or indirectly (in the case of general parking removed in the vicinity of relevant services) impact upon blue badge holders (including elderly residents who may have reduced mobility). Where this is the case, alternative provision would be made to mitigate against any disproportionate impacts.

The Wheels for Wellbeing's Annual Survey of Disabled Cyclists in 2019¹³ stated in its key findings that 51% of respondents have been unable to complete a journey due to inaccessible cycle routes and 32% have been unable to park their non-standard cycle. Opportunities should be sought to ensure that the network is also accessible for disabled cyclists, and that adequate cycle infrastructure is provided if found to be lacking, to reduce the possibility for indirect impacts.

¹² Department for Transport, Clery, E, et al, Disabled People's Travel Behaviour and Attitudes to Travel, 2017 available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647703/disabled-peoples-travel-behaviour-and-attitudes-to-travel.pdf

¹³ Wheels for Wellbeing's Annual Survey of Disabled Cyclists (2019) <https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf>

Sex (including gender)

The proposed Scheme has the potential to indirectly impact a higher proportion of women during construction. Women are more likely than men to provide both education / escort trips and leisure trips¹⁴ (likely with children) and are much more likely to be responsible for childcare (according to the Office for National Statistics¹⁵). During construction, there may be traffic delays associated with diversions or re-routing to enable improvements at the A259 Dymchurch Road and Botolph's Bridge Road junction. This could disproportionately affect women as the primary escort providers. However once operational, the provision of a new segregated cycleway and safer crossings associated with the proposed Scheme would benefit women by providing a safe route to escort children to school by bicycle, or to provide leisure trips with infants, henceforth encouraging active travel.

Men are much more likely than women to commute to work via bicycle (74% of commuters that cycle are men, 26% are women¹⁶), therefore the operation of the proposed Scheme is likely to benefit men, causing reduced journey times and safer travel routes.

Gender identity and transgender

There is no clear evidence, data or rationale to consider that the construction or operation of the proposed Scheme will have a direct or disproportionate impact on this group. This assumption will be reviewed following any consultation and during the detailed design stage.

Race

There is no clear evidence, data or rationale to consider that the construction or operation of the proposed Scheme will have a direct or disproportionate impact on this group. This assumption will be reviewed following any consultation and during the detailed design stage.

¹⁴ National Travel Survey (2019) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906847/nts-2019-factsheets.pdf (Accessed: 25 November 2020).

¹⁵ Office for National Statistics (2020) INAC01 SA: Economic Inactivity by Reason <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/economicinactivity/datasets/economicinactivitybyreasonseasonallyadjustedinac01sa> (Accessed: 25 November 2020).

¹⁶ Office for National Statistics (2018) <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/thecommutinggapmenaccountfor65ofcommutesla stingmorethananhour/2018-11-07> (Accessed: 25 November 2020).

Religion and belief

Hythe Holy Cross Church is located 606m north east of the proposed Scheme on Jubilee Close, which is only accessible from the A259 Dymchurch Road. Any users travelling from the east will not be affected by the construction of the proposed Scheme, however those travelling from the west may experience some disruption in the form of closures and / or journey delays from diversions. Given the temporary nature of the construction works, it is unlikely that attendees of the Hythe Holy Cross Church will experience significant effects. It is unlikely that attendees of the church will be directly affected or will experience a disproportionate impact during operation, the proposed Scheme is likely to benefit attendees of the church who cycle to this facility.

Sexual orientation

There is no clear evidence, data or rationale to consider that the construction or operation of the Scheme will have a direct or disproportionate impact on this group. This assumption will be reviewed following any consultation and during the detailed design stage.

Marriage and civil partnerships

There is no clear evidence, data or rationale to consider that the construction or operation of the proposed Scheme will have a direct or disproportionate impact on this group. This assumption will be reviewed following any consultation and during the detailed design stage.

Pregnancy and Maternity

The proposed Scheme might indirectly impact a higher proportion of women during construction. Women are more likely than men to provide both education / escort trips and leisure trips¹⁷ (likely with children) and are much more likely to be responsible for childcare (according to the Office for National Statistics¹⁸). During construction, there may be traffic delays associated with diversions or re-routing to enable improvements at the A259 Dymchurch Road and Botolph's Bridge Road junction, which is likely to indirectly and disproportionately impact women as the primary escort providers. However once operational, the provision of a new segregated cycleway and safer crossings associated with the proposed Scheme would benefit women by providing a safe route to escort children to school by bicycle, or to provide leisure trips with infants, henceforth encouraging active travel.

¹⁷ National Travel Survey (2019) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906847/nts-2019-factsheets.pdf

¹⁸ Office for National Statistics (2020) INAC01 SA: Economic Inactivity by Reason <https://www.ons.gov.uk/employmentandlabourmarket/peoplenotinwork/economicinactivity/datasets/economicinactivitybyreasonseasonallyadjustedinac01sa>

Deprivation

There are unlikely to be disproportionate impacts on poorer households during construction, but there are likely to be benefits during operation. Poorer households are much less likely to have access to a car¹⁹, and therefore have an existing dependence on the walking and cycle network already, for education, employment or access to facilities. Any improvements to the safety or efficiency of this network would therefore benefit them.

Adverse Impact

As outlined above, there is likely to be a low negative impact on the Age, Disability, Sex (including gender), Religion and Belief and Pregnancy and Maternity Protected Groups during construction. These effects are associated with changes to access to educational and religious facilities, journey delays including for education escort, potential for closures and diversions to enable junction improvements. As stated above, these effects are temporary, short term and reversible, however the following mitigation is still deemed to be required to minimise impacts as far as possible:

- Suitable signage and other accessible communications will be erected to advise of impending changes and access to the area will be retained during the construction of the proposed Scheme; and
- The local police, fire department and hospitals will be informed of changes to the road layouts and access to destinations during the construction of the proposed Scheme.

Positive Impact:

A low or medium favourable impact has been identified for the Age, Disability, Sex (including gender), Religion and Belief and Pregnancy and Maternity Protected Groups, and Deprivation Protected Groups, as outlined above. This is due to a number of factors including improved journey times, improved safety, improved access and health benefits associated with active travel. However, it is considered that the actual scale of the benefits depends on the uptake of the proposed Scheme. Some measures to improve uptake include:

- To ensure uptake is maximised, it should be ensured that there is adequate provision for cycling infrastructure to safely store bicycles at the schools;

¹⁹ Office for National Statistics (2011) <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access>

- It is also recommended that Bikeability Training is provided for school-age children within the study area, which may give parents more confidence to allow their children to cycle independently to school, as well as giving the children themselves confidence. This is likely to therefore help to reduce car trips;
- It is recommended that the adequacy of resting places along the route is reviewed, and additional resting places provided if deemed unsuitable; and
- Opportunities should be sought to ensure that the network is also accessible for disabled cyclists, and that adequate cycle infrastructure is provided if found to be lacking, to reduce the possibility for indirect impacts.

JUDGEMENT

There are likely to be a mixture of positive and negative impacts on Protected Groups resulting from the proposed Scheme. Until the design is developed in more detail it is an initial screen of these impacts that is required, however it is currently thought that the impacts are likely to be felt on the following Protected Groups:

- Age;
- Disability;
- Sex (including gender);
- Religion and Belief; and
- Pregnancy and Maternity.

Assuming that the mitigation outlined in the sections below is implemented it is judged that the proposed Scheme can **adjust and continue** with minor implications on Protected Groups.

Part 3 - Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Resource implications
All Protected Characteristics	Issues identified in Parts 1 and 2 above may evolve following consultation, or new issues may be identified.	Conclusions will be revisited following consultation.	Fully inclusive and thorough assessment of impacts on Protected Groups, including a list of appropriate and approved mitigation items.	Kent County Council (Schemes Planning and Delivery)	Following public consultation	To be built into project resource plans
Age	Increased uptake of cycling by school aged children (relative to the baseline) as a result of the proposed Scheme.	Adequate provision of cycling infrastructure to safely store bicycles at the school should be ensured.	Improvement in uptake of active travel to school.	Kent County Council (Schemes Planning and Delivery and School officers), local schools	Detailed design stage	To be built into project resource plans
Age	Increased uptake of cycling by school aged children (relative to the baseline) as a result of the proposed Scheme.	It is recommended that Bikeability Training is provided for school-age children in the study area.	This may give parents more confidence to allow their children to cycle independently to school, as well as giving the	Kent County Council (Schemes Planning and Delivery and School officers), local schools and Kent Bikeability	Post-Construction / Operation	To be built into project resource plans

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27

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			children themselves confidence. This would therefore reduce car trips.	officer		
Age / Disability	Increased use of safer cycleway and crossings by elderly / disabled people.	It is recommended that the adequacy of resting places along the route is reviewed, and additional resting places including in the detailed design if deemed unsuitable.	Improvement in safe uptake of proposed Scheme for elderly / disabled people, and those with limited mobility.	Kent County Council (Schemes Planning and Delivery) and Designer & Main Contractor (Amey)	Detailed design stage	To be built into project resource plans
Age / Disability	Changes in access / locations of bus stops for travel.	Suitable signage and other accessible communications will be erected at bus stops to advise of impending changes and access to the area will be retained during the construction of the proposed Scheme.	Reduced disturbance to bus travel during construction.	Kent County Council (Schemes Planning and Delivery) / Main Contractor (Amey) / Local Highway authority / Local bus operators	Pre-Construction / Construction	To be built into project resource plans
Sex (including gender)	Delays to education escort trips, which would affect women.	Suitable signage will be erected to advise of impending changes and access to the area will be retained during the	Informed decision-making and travel plans for education escort trips.	Kent County Council (Schemes Planning and Delivery) / Main Contractor	Pre-Construction / Construction	To be built into project resource plans

		construction of the proposed Scheme.		(Amey)		
Religion and Belief	Delays to access to places of worship during construction.	Suitable signage will be erected to advise of impending changes and access to the area will be retained during the construction of the proposed Scheme.	Informed decision-making and travel plans for trips to places of worship.	Kent County Council (Schemes Planning and Delivery) / Main Contractor (Amey)	Pre-Construction / Construction	To be built into project resource plans

Have the actions been included in your business/ service plan?

Yes/No