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

Equality Analysis / Impact Assessment (EqIA)

Directorate/ Service:

Name of decision, policy, procedure, project or service: Kent Active Travel Fund: Canterbury: A257 Littlebourne Road to City Centre

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 schemes, which are still very much in an early design stage:

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

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The schemes aim to encourage and enable active travel, which means walking or cycling as a means of transport 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.

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

This proposed Scheme (shown in Figure 1) aims to create a new city centre cycling route connecting various key attractors in the east to the city centre, including several educational establishments. The majority of the proposed Scheme runs along Longport, from the Longport/St Martin's Hill junction in the east, and past the Church Street/Broad Street junction in the west at the city centre of Canterbury. 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:

- New cycle route which is separated from traffic and pedestrians on Longport and uses low traffic roads from Monastery Street to Burgate;
- New cycle parking facilities;
- Wider footways to provide additional space for pedestrians;
- Improved crossing facilities to provide safer crossing points for pedestrians and cyclists;
- Network of signage around new cycle route to navigate cyclists and pedestrians. Removal of loading bays; and

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• Potential for placemaking improvements along the new cycling route for seating, planting, and higher quality surfacing to create a more attractive environment.

Route length:

• 0.5 miles (800m)

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 / Gender;
- Religion; 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

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GET Document Control

Revision History

Version	Date	Authors	Comment
V0.2	4/12/2020	Georgie Kleinschmidt (Author), WSP	
		Sophie Collins (Review), WSP	
		Sally Newbold (Quality Assurance), WSP	
V1 (this should be assigned to the version the Director signs off)			

Document Sign-Off

Attestation

I have read and paid due regard to the Equality Analysis/Impact Assessment concerning the Kent Active Travel Fund Scheme 1: A257 Littlebourne Road to City Centre. 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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Tim Read	Rel	Head of Service	7/12/20
Simon Jones	Clinica four	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 Canterbury has been compiled from publicly available data to provide context and to inform the assessment. Data for Canterbury 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 city of Canterbury, 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:

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¹ NOMIS (2019), Labour Market Profile – Kent. Available at: <u>https://www.nomisweb.co.uk/reports/Imp/la/1941962885/report.aspx</u> (Accessed: 11 November 2020).

² HM Government (2010) The Equality Act 2010. Available at: https://www.gov.uk/guidance/equality-act-2010-guidance

- 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 socio-economic matrices and can be used as an indicator for vulnerable groups.

Ethnicity and religion profile

The percentage of each ethnicity in the Canterbury 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 Canterbury (87.5%) is higher than the England and Wales average percentage (80.5%). The percentages of population for other ethnicities in Canterbury are generally lower than the England and Wales average, except for those classified as "Asian/Asian British: Chinese". This indicates that Canterbury is less diverse when compared to the general population in England and Wales.

Ethnic group	Cant	Canterbury England and		and Wales
	Total no.	% of total*	Total no.	% of total*
White:	132,269	87.5%	45,134,686	80.5%
English/welsh/Scottish/Northern Irish/British				
White: Irish	1,260	0.8%	531,087	0.9%
White: Gypsy or Irish Traveller	374	0.2%	57,680	0.1%
White: Other White	6,717	4.4%	2,485,942	4.4%
Mixed/Multiple Ethnic Groups:	680	0.4%	426,715	0.8%

³ NOMIS (2011), Ethnic group. Available at: <u>https://www.nomisweb.co.uk/census/2011/ks201ew</u> (Accessed: 11 November 2020).

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White and Black Caribbean				
Mixed/Multiple Ethnic Groups: White and Black African	305	0.2%	165,974	0.3%
Mixed/Multiple Ethnic Groups: White and Asian	897	0.6%	341,727	0.6%
Mixed/Multiple Ethnic Groups: Other Mixed	669	0.4%	289,984	0.5%
Asian/Asian British: Indian	1,448	1.0%	1,412,958	2.5%
Asian/Asian British: Pakistani	306	0.2%	1,124,511	2.0%
Asian/Asian British: Bangladeshi	251	0.2%	447,201	0.8%
Asian/Asian British: Chinese	1,436	1.0%	393,141	0.7%
Asian/Asian British: Other Asian	1,694	1.1%	835,720	1.5%
Black/African/Caribbean/Black British: African	1,338	0.9%	989,628	1.8%
Black/African/Caribbean/Black British: Caribbean	437	0.3%	594,825	1.1%
Black/African/Caribbean/Black British: Other Black	162	0.1%	280,437	0.5%
Other ethnic group: Arab	405	0.3%	230,600	0.4%
Other ethnic group: Any other ethnic group	497	0.3%	333,096	0.6%

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

The proportion of different beliefs in Canterbury and England and Wales are provided in **Table 2**. It shows that the majority of the population in Canterbury identifies as Christian (60.3%) and the second largest group is no religion (28.5%). It also indicates that the population in Canterbury has a similar 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.

Religion	Canterbury		England and Wales	
-	Total no.	% of total*	Total no.	% of total*
Christian	91,122	60.3%	33,243,175	59.3%
Buddhist	880	0.6%	247,743	0.4%
Hindu	1,055	0.7%	816,633	1.5%
Jewish	267	0.2%	263,346	0.5%
Muslim	1,838	1.2%	2,706,066	4.8%
Sikh	245	0.2%	423,158	0.8%
Other religion	760	0.5%	240,530	0.4%
No religion	43,117	28.5%	14,097,229	25.1%
Religion not stated	11,861	7.8%	4,038,032	7.2%

Table 2 Percentage of People Belonging to Specific Faiths in Canterbur	v and England and Wales (2011) ⁴
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*Note: Percentages may not sum exactly due to rounding.

Age profile

The age profile in Canterbury 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 Canterbury is generally lower for ages ranging between 0 and 59; and slightly higher for ages ranging between 60 and above 90; therefore there may be a higher proportion of receptors in these categories which could be affected by the proposed Scheme.

Age range	Cant	erbury	England	and Wales
	Total no.	% of total*	Total no.	% of total*
0-4	7,514	5.0%	3,496,750	6.2%
5 – 7	4,533	3.0%	1,927,039	3.4%
8 – 9	2,973	2.0%	1,208,672	2.2%
10 – 14	8,393	5.6%	3,258,677	5.8%
15	1,761	1.2%	687,994	1.2%
16 – 17	3,656	2.4%	1,391,235	2.5%
18 – 19	7,892	5.2%	1,460,156	2.6%

Table 3 Age profile in Canterbury and England and Wales (2011)⁵

⁴ NOMIS (2011), Religion. Available at: <u>https://www.nomisweb.co.uk/census/2011/ks209ew</u> (Accessed: 11 November 2020).

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⁵ NOMIS (2011), Age structure. Available at: <u>https://www.nomisweb.co.uk/census/2011/ks102ew</u> (Accessed: 11 November 2020).

20 – 24	16,222	10.7%	3,807,245	6.8%
25 – 29	8,658	5.7%	3,836,609	6.8%
30 – 44	24,642	16.3%	11,515,165	20.5%
45 – 59	26,800	17.7%	10,886,135	19.4%
60 - 64	9,656	6.4%	3,377,162	6.0%
65 – 74	14,341	9.5%	4,852,833	8.7%
75 – 84	9,540	6.3%	3,115,552	5.6%
85 – 89	2,921	1.9%	825,671	1.5%
90+	1,643	1.1%	429,017	0.8%

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

Sex Profile

Table 4 presents the 2011 Census gender profile in Canterbury and England and Wales. It indicates that the percentage of males (all ages) and females (all ages) in Canterbury 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 Canterbury and England and Wales (2011)⁶

Sex	Canterbury		England and Wales	
	Total no.	% of total	Total no.	% of total
Male	72,638	48.1%	27,075,912	49.2%
Female	78,507	51.9%	28,502,536	50.8%

Disability

A total of 27,318 (18.1%) of the population in Canterbury are living with a long-term health problem or disability, which is a slightly higher proportion than the England and Wales average of 17.9%. A slightly smaller proportion of the population in Canterbury (8.2%) identify as having a long-term health problem or disability which limits their day to day activities a lot, when

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⁶ NOMIS (2011), Usual resident population. Available at: <u>https://www.nomisweb.co.uk/census/2011/ks101ew</u> (Accessed: 11 November 2020).

compared with the England and Wales average (8.5%)⁷, therefore there are not likely to be any significant number of additional receptors which could 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 four LSOAs⁸: Canterbury 020F, Canterbury 014B, Canterbury 016A and Canterbury 016D, with the majority of the proposed Scheme falling within Canterbury 016A and Canterbury 016D.

- Canterbury 016A is the least deprived of the four LSOAs, and located along the central and southern sections of the proposed Scheme; across the seven domains of deprivation, Canterbury 016A is amongst the 10% to 50% least deprived neighbourhoods in the country for five domains of deprivation, except for "Crime" (where it is in the 40% most deprived) and "Living Environment Deprivation" (where it is in the 50% most deprived);
- Canterbury 016D is and located along the central and eastern sections of the proposed Scheme. It is among the 50% most deprived neighbourhoods in the country, ranked 13,873. It is amongst the 20% to 50% most deprived neighbourhoods in all domains of deprivation except "Living Environment Deprivation" (where it is amongst the 20% least deprived neighbourhoods);
- Canterbury 020F is and located along the westernmost section of the proposed Scheme, It is amongst the 40% least deprived neighbourhoods in the country, with a rank of 22,927. It is amongst the 10% to 40% least deprived in all domains of deprivation, except "Crime" (in the 10% most deprived in the country), "Barriers to Housing and Services" (in the 50% most deprived), and "Living Environment Deprivation" (30% most deprived);
- Canterbury 014B is and located along the easternmost section of the proposed Scheme. It is the most deprived of the four LSOAs, ranked 3,152 and is therefore amongst the 10% most deprived neighbourhoods in the country. It is amongst the 10% to 30% most deprived neighbourhoods in the country for all domains of deprivation.

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⁷ NOMIS (2011), Long-term health problem or disability. Available at: <u>https://www.nomisweb.co.uk/census/2011/dc3201ew</u> (Accessed: 11 November 2020). ⁸ Indices of Deprivation (2019), Indices of Deprivation. Available at: <u>https://dclgapps.communities.gov.uk/imd/iod_index.html</u># (Accessed: 12 November 2020)

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).

Local Communities and Public Transport

Residential communities located within the 1km study area include the following:

- The areas of Longport and St Martins;
- Residences located immediately adjacent to the proposed Scheme, along the Paddock, the A257, Longport, Church Street and Burgate;
- Park Cottages, North Holmes Road, Lower Chantry Road, Love Lane, Monastry Street, Burgate Lane, and Canterbury Lane which connect to the proposed Scheme;
- Albert Road, located 50m south of the proposed Scheme;
- Ivy Lane, located 75m south of the proposed Scheme;
- St Paul's Terrace, located 100m south of the proposed Scheme;
- St Martin's Avenue, located 100m north of the proposed Scheme; and
- Numerous other residential areas across the city within the 1km Study Area.

Public transport, pedestrian and cycling facilities

- There are two bus stops along the A257 (Canterbury, opp HM Prison and Canterbury, adj HM Prison);
- There are two bus stops along Lower Chantry Lane, several along the A28, and several associated with the Bus Station along St George's Lane; these roads run off the main proposed Scheme route;
- There is existing provision for cyclists in the bus lane along the A257 from HM Prison westwards until it reaches St George's Roundabout;
- There is a short provision for cyclists along Longport, on the exit of St George's Roundabout;
- There is some form of pedestrian pavement provision along the length of the proposed Scheme, although this is narrow in places.
- The North Downs Way National Trail is located along the length of the proposed Scheme;
- Sustrans Local, Regional and National Cycle Routes (including Regional Route 16, the Crab and Winkle Way, Coast to Cathedral cycle route, Stour Valley walk and Elham Valley Way) intersect or run along the proposed Scheme, and connect to a wider network across the city;

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- Public Rights of Way numbers 0316/CC29/1, 0316/CC45/1, 0316/CC41/1 and 0316/CC73/1 run in close proximity to the proposed Scheme;
- Canterbury East railway station is located 750m south west of the proposed Scheme; and
- Canterbury West railway station is located 950m north west 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. All distances provided are approximate.

Pre-schools and Nurseries

There are six pre-schools within 1km of the proposed Scheme:

- The Nursery at Canterbury College, located 250m south of the proposed Scheme;
- Bright Horizons Canterbury Day Nursery, located 600m south east of the proposed Scheme;
- The Canterbury Day Nursery, located 350m north of the proposed Scheme;
- Lilliput Pre-School, located 800m north of the proposed Scheme;
- Busy Bees at Canterbury, located 1km north of the proposed Scheme; and
- Tiny Stars Day Care Canterbury, located 1km south west of the proposed Scheme.

Primary schools

There are four primary schools within 1km of the proposed Scheme:

- St Thomas' Catholic Primary School, located 500m north of the proposed Scheme;
- St Peter's Methodist Primary School, located 550m west of the proposed Scheme;
- St John's Church of England Primary School, located 550m north west of the proposed Scheme; and
- Pilgrim's Way Primary School, located 700m south east of the proposed Scheme.

Secondary schools

There is one secondary school within 1km, the Barton Court Grammar School, which is located adjacent to the proposed Scheme, to the south.

Higher education

There are seven higher education campuses within 1km of the proposed Scheme:

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- Canterbury Prison (Christchurch University Campus), located adjacent to the proposed Scheme;
- Canterbury College / University for the Creative Arts, located 100m to the south of the proposed Scheme;
- Warnborough College, located 100m south of the proposed Scheme;
- Spring Lane Campus (Canterbury College), located 150m south east of the proposed Scheme;
- Canterbury Christ Church University, located 150m north of the proposed Scheme;
- St George's Centre (Canterbury Christ Church University), located 200m south west of the proposed Scheme; and
- The King's School International College, located 1km north east of the proposed Scheme.

GPs, dentists and pharmacies

There are four GP surgeries within 1km of the proposed Scheme:

- New Dover Road Surgery, located 350m south of the proposed Scheme;
- Canterbury Health Centre, located 450m south of the proposed Scheme;
- Cossington House Surgery, located 500m south of the proposed Scheme; and
- Northgate Medical Practice, located 700m north of the proposed Scheme.

There are four dentist surgeries within 1km of the proposed Scheme:

- St Georges Dental Practice, located 200m south of the proposed Scheme;
- Chopra & Associates, located 400m north of the proposed Scheme;
- King Street Orthodontic Practice, located 400m north west of the proposed Scheme; and
- St Dunstans Dental Practice, located 900m west of the proposed Scheme.

There are seven pharmacies within 1km of the proposed Scheme:

- Boots (St George's Shopping Centre), located 150m south of the proposed Scheme;
- Boots (Oaten Hill), located 350m south of the proposed Scheme;
- Boots (Whitefriars St), located 250m south west of the proposed Scheme;
- Cheadles Chemist, located 800m west of the proposed Scheme;
- Eckersley Pharmacy located 650m north of the proposed Scheme;
- Lloyds Pharmacy, located 750m north of the proposed Scheme; and
- Superdrug Pharmacy, located 200m south west of the proposed Scheme.

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Hospitals

The St Martin's Hospital (including a maternity ward) is located 750m east of the proposed Scheme.

Care homes

There are three care homes located within 1km of the proposed Scheme:

- Chaucer House Care Home, located 400m east of the proposed Scheme;
- Orchard House, located 550m north of the proposed Scheme; and
- Willow Tree Lodge, located 800m south of the proposed Scheme.

Places of worship and cemeteries / burial grounds

There are 19 places of worship within 1km of the proposed Scheme:

- St Paul's Church, located adjacent to the proposed Scheme to the south;
- St Thomas' of Canterbury RC Church, located 50m west of the proposed Scheme;
- St Martin's Church, located 100m north east of the proposed Scheme;
- Canterbury Cathedral, located 150m north west of the proposed Scheme;
- Canterbury Baptist Church, located 200m south of the proposed Scheme;
- St Margaret's Church, located 300m west of the proposed Scheme;
- St Andrew's Church, located 350m south west of the proposed Scheme;
- Quakers Religious Society of Friends, located 400m north west of the proposed Scheme;
- Greyfriar's Chapel, located 500m west of the proposed Scheme;
- St Mary Bredin Church, located 500m south of the proposed Scheme;
- St Peters Methodist Church, located 500m west of the proposed Scheme;
- St Peters Church, located 500m north west of the proposed Scheme;
- The City Church, located 550m west of the proposed Scheme;
- Emmanuel Church located 550m north of the proposed Scheme;
- Canterbury Masonic Hall, located 600m west of the proposed Scheme;
- St Mildred's Church, located 700m south west of the proposed Scheme;
- All Saints Church, located 800m north of the proposed Scheme;
- New Life Church, located 1km north west of the proposed Scheme; and
- Barton Church, located 1km south east of the proposed Scheme.

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Other local facilities

There are 9 convenience stores within 1km of the proposed Scheme:

- Waitrose (St George's Centre), located 150m south of the proposed Scheme;
- Tesco (New Dover Road), located 200m south of the proposed Scheme;
- Marks and Spencer (St Georges Street), located 250m south of the proposed Scheme;
- Tesco (Whitefriars Shopping Centre), located 300m south of the proposed Scheme;
- Sainsburys (High Street), located 400m west of the proposed Scheme;
- Sainsburys (Kingsmead Road), located 700m north of the proposed Scheme;
- Aldi (St Andrew's Close), located 800m south west of the proposed Scheme;
- Sainsburys (Dunstans Street), located 800m west of the proposed Scheme; and
- Sainsburys (St. Lawrence Ground), located 1km south of the proposed Scheme.

There are five post offices within 1km of the Scheme:

- St Martins Hill Post office, located adjacent to the proposed Scheme, immediately to the north
- St Georges Post Office, located adjacent to the proposed Scheme, immediately to the south
- Canterbury Post Office, located 100m to the south west of the proposed Scheme
- Zealand Road Post Office, located 1km to the south of the proposed Scheme
- Royal Mail Canterbury DO, located 800m to the north of the proposed Scheme

There are four facilities with a food bank service within 1km of the proposed Scheme:

- Porchlight charity, located 500m south west of the proposed Scheme
- Catching Lives homeless service, located 700m south west of the proposed Scheme
- St Mary Bredin Church, located 500m south of the proposed Scheme
- All Saints Church, Canterbury located 1km north east 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 likely to have a **Low Negative** Impact during construction on the Age, Disability, Sex, Religion and Maternity Protected Groups. This rating has been allocated because there are likely to be short-term and reversible negative

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impacts of the construction of the proposed Scheme on a small number of individuals from these groups, including noise and vibration impacts, 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, Disability, Sex, Pregnancy / Maternity and Deprivation 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 Religious Protected Group was identified; the benefits were considered to be lower for this group as the uptake of the scheme is unlikely to be as high, but there may be some benefits associated with improved crossing points and safer footways.

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.

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

	You <i>MUST</i> provide a brief commentary as to your findings, or this EqIA will be returned to you unsigned			
Protected Group	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 secondary age children at Barton Court Grammar	Yes, medium favourable impact during operation. Benefits are likely to be felt on primary and secondary age

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			School, as well as elderly drivers / carers travelling to / from St Martin's Hospital and / or Chaucer House Care Home. Young / elderly users of the adjacent bus stops would be adversely affected.	students who are able to safely cycle to school. Elderly people would benefit from safer crossings and wider footways during operation.
Disability	-	-	Yes, during construction. Impacts are likely to be felt on disabled drivers / carers travelling to / from St Martin's Hospital and / or Chaucer House Care Home. Disabled users of the adjacent bus stops would be adversely affected.	Yes, medium favourable impact during operation. Disabled people would benefit from safer crossings and wider footways during operation.
Sex (including gender)	-	-	Yes, during construction. Impacts are likely to be felt on women who undertake education escort trips, and / or women who need to access the maternity ward at St Martin's	Yes, medium favourable impact during operation. Women are likely to benefit from wider footways and safer crossings when providing education escort trips. Men are

			Hospital.	likely to benefit from safer cycling routes for commuting purposes.
Gender identity/ Transgender	-	-	-	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 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. Impacts are likely to be felt on visitors to St Paul's Church and St Thomas' of Canterbury Church, associated with construction noise	Yes, low favourable impact during operation. There may be some benefits to users of these places of worship associated with the widened

			and vibration and	footways and safer
			access.	cycleways and
				crossings, but it is
				more likely that a
				vehicle would be used
				to access them.
Sexual Orientation	-	-	-	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	-	-	Yes, during	Yes, medium
Maternity			construction.	favourable impact
			Impacts are likely to be	during operation.
			felt on women who	Women are likely to
			undertake education	benefit from wider
			escort trips, and / or	footways and safer
			women who need to	crossings when
			access the maternity	providing education
			ward at St Martin's	escort trips. Men are
			Hospital.	likely to benefit from
				safer cycling routes for
				commuting purposes.
Marriage and Civil	-	-	-	No impact predicted
Partnerships				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 impact predicted during construction. 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, medium favourable impact during operation. Poorer households are likely to use the walking and 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 / gender
- Pregnancy and maternity
- Religion and belief

It is anticipated that the proposed 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 EqIA 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 the analysis below, but include:

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

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:

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

Analysis

Age

Neither the construction or the operation of the proposed Scheme is likely to directly affect or have a disproportionate impact on pre-school school aged children. Given the relative distance of the proposed Scheme from the pre-schools within 1km, the short duration of the construction period and given each has several access route options, there is not likely to be a high negative impact in terms of journey delays due to diversions, or operational improvements in safety or access to the pre-schools.

The construction of the proposed Scheme is not likely to directly affect or have a disproportionate impact on primary school aged children. There are likely to be direct benefits of the proposed Scheme to primary age children during operation. According to the

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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 travelling to school on foot. 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 cycle paths and pavements as a result of the proposed Scheme could therefore increase the proportion of children travelling to school on foot or 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 walk or cycle to school already.

During construction, there may be temporary disruption to secondary school age students, due to the proximity of the proposed Scheme works to the Barton Court Grammar School. This might include noise and vibration disruption as the works are conducted. There are likely to be operational benefits for secondary school age children who will be able to travel more safely to school along the new improved cycle routes via active travel means. According to the National Travel Survey Factsheet¹¹, secondary school aged children are more likely to use public transport or walking, cycling or horse-riding (WCH) routes, with 37% walking, 31% taking the bus and 24% by car. Approximately 5% cycle to school. Therefore, any improvements to the WCH network will benefit this age group and could encourage cycling uptake, especially given the direct access to the school.

The construction of the proposed Scheme, particularly any temporary road diversions, may cause temporary disruption and delays to residents of, carers at, and visitors to Chaucer House Care Home, who would likely use the A257 to access facilities (including health facilities) in the city centre. Elderly drivers who use this road to access facilities in the city centre, or St Martin's Hospital in the other direction, might also be disproportionately impacted by any confusion caused by unfamiliar road layouts which might be in place during construction. Delays during construction might also impact journey times for carers and staff at St Martin's Hospital. Once the proposed Scheme is operational, elderly residents of the area would likely benefit from the proposed Scheme, particularly relating to wider footways (which are more likely to comfortably host wheelchairs and mobility aids) and safer crossing points such as the signalised junction improvement at the intersection with Broad Street, and at St Augustine's Roundabout.

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⁹ National Travel Survey (2014) <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/476635/travel-to-school.pdf</u> ¹⁰ Office for National Statistics (2011) <u>https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access</u>

¹¹National Travel Survey (2014) <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/476635/travel-to-school.pdf</u>

Any changes to the access to the two bus stops along the A257 as a result of the construction of the proposed Scheme might also indirectly and disproportionately impact elderly people and school-aged children, who are more likely to use public transport than other groups¹².

Should any changes to parking be required to accommodate the construction or the operation of the proposed Scheme (for example along Burgate between Canterbury Lane and Burgate Lane), 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.

Disability

Neither the construction or the operation of the proposed Scheme is likely to directly affect disabled people.

The construction of the proposed Scheme, particularly any temporary road diversions, may cause temporary disruption and delays to local disabled residents, who would likely use the A257 to access facilities (including health facilities) in the city centre. Disabled drivers who use this road to access facilities in the city centre, or St Martin's Hospital in the other direction, might also be disproportionately affected by any confusion caused by unfamiliar road layouts which might be in place during construction. Any changes to the access to the two bus stops along the A257 as a result of the construction of the proposed Scheme might also disproportionately affect disabled people and those with limited mobility¹³. Delays during construction might also impact journey times for carers and staff at St Martin's Hospital.

Should any changes to parking be required to accommodate the construction or the operation of the proposed Scheme (for example along Burgate between Canterbury Lane and Burgate Lane), this has the potential to directly (in the case of designated parking bays) or indirectly (in the case of general parking removed in the vicinity of relevant services) impact upon disabled drivers and blue badge holders. Where this is the case, alternative provision would be made to mitigate against any disproportionate impacts. However, at this time it is not thought that any designated disabled parking spaces will be affected by the Proposed Scheme.

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¹² National Travel Survey (2020) <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929992/annual-bus-statistics-year-ending-march-2020.pdf</u>

¹³ National Travel Survey (2019) <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906847/nts-2019-factsheets.pdf</u>

Once the proposed Scheme is operational, disabled residents of the area would likely benefit from the proposed Scheme, particularly relating to wider footways (which are more likely to comfortably host wheelchairs and mobility aids) and safer crossing points.

The Wheels for Wellbeing's Annual Survey of Disabled Cyclists in 2019¹⁴ 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.

Sex (including gender)

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 trips¹⁵ (likely with children) and are much more likely to be responsible for childcare (according to the Office for National Statistics¹⁶). During construction, there may be traffic delays associated with diversions or re-routing, which are likely to disproportionately affect women as the primary escort providers. However once operational, the provision of wider pavements and safer crossings associated with the proposed Scheme would benefit women by providing a safe route to escort children to school on foot, or to provide leisure trips with infants, henceforth encouraging active travel. The provision of wider pavements along the proposed Scheme corridor may also benefit women with infants in prams or young children, as it would provide a safer travel route to access services in the city centre.

Men are much more likely than women to commute to work via bicycle (74% of commuters that cycle are men, 26% are women¹⁷), therefore the operation of the proposed Scheme is likely to benefit men, causing reduced journey times and safer travel routes. Delays associated with the construction of the proposed Scheme may also affect women's ability to access key services at the maternity ward at St Martin's Hospital.

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¹⁴ Wheels for Wellbeing's Annual Survey of Disabled Cyclists (2019) <u>https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf</u>

¹⁵ National Travel Survey (2019) <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906847/nts-2019-factsheets.pdf</u>

¹⁶ Office for National Statistics (2020) INAC01 SA: Economic Inactivity by Reason

https://www.ons.gov.uk/employmentandlabourmarket/peoplenotinwork/economicinactivity/datasets/economicinactivitybyreasonseasonallyadjustedinac01sa ¹⁷ Office for National Statistics (2018)

https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/thecommutinggapmenaccountfor65ofcommutesla stingmorethananhour/2018-11-07

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.

Religion and belief

There is the possibility that the construction of the proposed Scheme could indirectly and disproportionately impact this protected group, due to the vicinity of the proposed Scheme to several churches, especially St Paul's Church and St Thomas' of Canterbury RC Church which are located very close to the proposed Scheme. The tranquillity of the churches and any internal and external spaces such as churchyards could be impacted (albeit temporarily) by the proposed Scheme's construction. There may be delays caused by visitors to the churches should the proposed Scheme require any temporary road diversions during construction. There may be benefits to visitors of the churches during operation, due to the improved connectivity for walkers, cyclists and wheelchair users as a result of the operation of the route, however it is likely that a larger proportion of visitors would use a vehicle to access them.

Sexual orientation

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.

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.

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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 trips¹⁸ (likely with children) and are much more likely to be responsible for childcare (according to the Office for National Statistics¹⁹). During construction, there may be traffic delays associated with diversions or re-routing, which are likely to indirectly and disproportionately impact women as the primary escort providers. However once operational, the provision of wider pavements and safer crossings associated with the proposed Scheme would benefit women by providing a safe route to escort children to school on foot, or to provide leisure trips with infants, henceforth encouraging active travel. The provision of wider pavements along the proposed Scheme corridor may also benefit women with infants in prams or young children, as it would provide a safer travel route to access services in the city centre.

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 car²⁰, 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, Religion and Pregnancy / Maternity Protected Groups during construction. These effects are associated with changes to access to healthcare and other facilities, journey delays including for education escort, potential confusion resulting from changing road layouts for elderly and disabled drivers) and noise and vibration disturbance. 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

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¹⁸ National Travel Survey (2019) <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906847/nts-2019-factsheets.pdf</u>

¹⁹ Office for National Statistics (2020) INAC01 SA: Economic Inactivity by Reason

https://www.ons.gov.uk/employmentandlabourmarket/peoplenotinwork/economicinactivity/datasets/economicinactivitybyreasonseasonallyadjustedinac01sa ²⁰ Office for National Statistics (2011) <u>https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access</u>

• 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 / Gender, Religion, Pregnancy and Maternity, and Deprivation Protected Groups, as outlined above. This is due to a number of factors including improved journey times, improved safety, and health benefits associated with active travel. However, it is considered that the actual scale of the benefits depends on the uptake of the 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 school;
- 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;
- 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; and
- It is recommended that all crossings (both during construction and operation) are usable for those with sight or hearing impairments, and for wheelchair users. The proposed Scheme should consider the type of surfacing used along the route. It is recommended that tarmac is used to surface the route, as this would make the route accessible for those with disabilities. If this is not possible, the route is likely to be less accessible to some users.

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 / Gender;
- Religion; and

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• 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.

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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. Kent County Council to liaise with local schools to explore what can be offered to students.	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	It is recommended that Bikeability Training is provided	This may give parents and caregivers	Kent County Council (Schemes Planning and	Post-Construction / Operation	To be built into project resource

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	school aged children (relative to the baseline) as a result of the proposed Scheme	for school-age children in the study area. Kent County Council to liaise with local schools and Bikeability to explore what can be offered to students.	more confidence to allow their children to cycle independently to school, as well as giving the children themselves confidence. This would therefore reduce car trips.	Delivery and School officers), local schools and Kent Bikeability officer		plans
Age / Disability	Increased use of safer footpaths and crossings by elderly / disabled people	It is recommended that the adequacy of resting places along the route is reviewed, and additional resting places included in the detailed design if deemed unsuitable.	Improvement in safe uptake of the 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	Increased confusion associated with altered road layout	Suitable signage and other accessible communications will be erected to advise of impending	Safer travel for elderly / disabled drivers during construction.	Kent County Council (Schemes Planning and Delivery) and Main Contractor (Amey)	Pre-Construction / Construction	To be built into project resource plans

	during construction.	changes and access to the area will be retained during the construction of the proposed Scheme.				
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) and Main Contractor (Amey), Canterbury Borough Council and local bus operators	Pre-Construction / Construction	To be built into project resource plans
Age / Disability	Delays to access care homes and hospitals during construction	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.	Informed decision- making and travel plans for carer trips.	Kent County Council (Schemes Planning and Delivery) and Main Contractor (Amey)	Pre-Construction / Construction	To be built into project resource plans
Age/Disability	Removal or amendments to designated	Review of parking provision during detailed design and	Avoidance of direct or indirect	Kent County Council (Schemes Planning and	Detailed design stage	To be built into project resource

	disabled parking or parking for eligible blue badge holders	provision of alternatives if necessary	impact on these Protected Characteristic Group	Delivery) and Designer		plans
Disability	Increased use of safer footpaths and crossings by disabled people and those with limited mobility	Design of the proposed Scheme should be in line with best practice guidance (such as Local Transport Note 1/20 ²¹). It is recommended that all crossings (both during construction and operation) are appropriate for those with sight or hearing impairments. The proposed Scheme should consider the type of surfacing used along the route. It is recommended that tarmac is used to surface the route, as this would make the	Improvement in safe uptake of the proposed Scheme for disabled people.	Kent County Council (Schemes Planning and Delivery), Designer and Main Contractor (Amey)	Detailed design stage	To be built into project resource plans

²¹ Department for Transport (2020) Local Transport Note 1/20: Cycle Infrastructure Design <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906344/cycle-infrastructure-design-ltn-1-20.pdf</u>

		route accessible for those with disabilities. Opportunities should be sought to ensure the design is accessible and inclusive (including inclusive cycle parking infrastructure). If this is not possible, the route is likely to be less accessible to some users.				
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 construction of the proposed Scheme.	Informed decision- making and travel plans for education escort trips.	Kent County Council (Schemes Planning and Delivery) and Main Contractor (Amey)	Pre-Construction / Construction	To be built into project resource plans

Sex (including gender)	Delays to access to healthcare facilities such as the maternity ward at St Martin's Hospital.	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 healthcare trips.	Kent County Council (Schemes Planning and Delivery) and Main Contractor (Amey)	Pre-Construction / Construction	To be built into project resource plans
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) and Main Contractor (Amey)	Pre-Construction / Construction	To be built into project resource plans

Have the actions been included in your business/ service plan? $\frac{1}{2}$ $\frac{1}{2}$ $\frac{1}{2}$

Next Steps

1. Having completed Part 3, then then please complete the Judgement and the Summary RAG Rating above, and submit this form to your Head of Service and Director for sign off. Once they have both signed, please send to <u>GETcsp@kent.gov.uk</u> and <u>diversityinfo@kent.gov.uk</u> with the title of the project clearly stated along with 'Final EqIA'. It will then be logged and published on the KCC Intranet as well as available to external customers upon request.

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- 2. If the activity will be subject to a Cabinet decision, the EqIA must be submitted to Democratic Services democratic.services@kent.gov.uk along with the relevant Cabinet report.
- 3. The original signed hard copy and electronic copy should be kept with your team for audit purposes

