

KENT COUNTY COUNCIL EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)

**This document is available in other formats, Please email
alternativeformats@kent.gov.uk or telephone on 03000 421553 (text relay
service 18001 03000 421553).**

Directorate: Growth, Environment and Transport (GET)

Name of policy, procedure, project or service

Local Transport Plan 4: Delivering Growth without Gridlock (2016 – 2031)

What is being assessed?

An updated Local Transport Plan.

Responsible Owner/ Senior Officer

Joe Ratcliffe

Date of Initial Screening

12/11/2015

Date of Full EqIA:

Version	Author	Date	Comment
1	Bhalraj Singh	12/11/2015	
2	Clive Lever	23/11/2015	Equality and Diversity Team comments supplied
3	J Hill	13/4/2016	Equality and Diversity Team comments supplied
4	Akua Agyepong	23/06/2016	Equality and Diversity Team comments supplied
5	Lucy Campbell	04/07/2016	Consultation draft
6	Nola Cooper	10/02/2017	First review following consultation revisions
7	Akua Agyepong	13/02/2017	Comments for review
8	Katie Pettitt	13/02/2017	Revised following Equality and Diversity Team comments

Screening Grid

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative	Internal action must be included in Action Plan	If yes you must provide detail
Age	No	Medium	None	No further assessment required. However, any specific schemes and policies that achieve LTP4 outcomes would be subjected to their own EqIA.	Yes. LTP4 commits KCC to promoting affordable, accessible and connected transport to enable access for all to jobs, education, health, and other services. This will benefit all age groups, but particularly those who are less likely to have access to a private car, such as the elderly and the young, and supports independence. Statistically, more road casualties are young men ¹ , providing a safe road network (including through education and training) will mitigate this. Other LTP4 outcomes will also benefit all age groups.
Disability	No	Medium	None	No further assessment required. However, any specific schemes and policies that achieve LTP4 outcomes will be subjected to their own EqIA.	Yes. As above, accessible transport will support independence, more notably providing wider benefits for those whose impairments prevent them from driving. Other LTP4 outcomes will also benefit those with disabilities – such as better health and wellbeing and safer travel.

¹ <http://www.brake.org.uk/safedrivingreports/15-facts-a-resources/facts/488-young-drivers-the-hard-facts>

Gender	No	Medium	None	No further assessment required. However, any specific schemes and policies that achieve LTP4 outcomes will be subjected to their own EqIA	Yes. Affordable and accessible transport for all will benefit specific groups, such as women with children and single mothers. Safer travel will improve opportunities for travel for women, as they are likely to use public transport more than men but drive less than men. Personal safety amongst women should improve, as they are more vulnerable when travelling at night ² . Men are more likely to be road casualties and providing a safer road network (including through education) will help mitigate this.
Gender identity	No	None	None	No	No
Race	No	Medium	None	No further assessment required. However, any specific schemes and policies that achieve LTP4 outcomes will be subjected to their own EqIA	Yes. Certain ethnic groups are in lower than average income groups and promoting affordable travel will promote equality for them in enabling access to greater employment and education opportunities.
Religion or belief	No	None	None	No	No
Sexual orientation	No	None	None	No	No
Pregnancy and maternity	No	Medium	None	No further assessment required. However, any specific schemes and policies that achieve LTP4 outcomes will be subjected to their own EqIA	Yes. Women with children will benefit from improved accessibility connectivity within transport, as well as it being more affordable.
Marriage and Civil Partnerships	No	None	None	No	No

² <http://content.tfl.gov.uk/women.pdf>

Carer's responsibilities	No	Medium	None	No further assessment required. However, any specific schemes and policies that achieve LTP4 outcomes will be subjected to their own EqIA	Yes. Safer, affordable, accessible and connected travel will promote equality for this group. In some instances, those who they care for may benefit, particularly for people needing to travel by bus through the Kent companion bus pass scheme. Schemes to ease congestion will make travelling between clients more reliable in terms of journey time.
---------------------------------	----	--------	------	---	--

PART 1: INITIAL SCREENING

Proportionality – From the Risk Matrix which has been completed above, the initial screen suggests that the potential for a negative impact on certain protected characteristics as a result of the implementation of the Local transport plan update delivery plan document is low.

Low	Medium	High
Low relevance or Insufficient information/evidence to make a judgement.	Medium relevance or Insufficient information/evidence to make a Judgement.	High relevance to equality, /likely to have adverse impact on protected groups

Context

The document is the successor to Local transport Plan 3, which was due to expire at the end of 2016. The new *Local Transport Plan 4: Delivering Growth without Gridlock* (LTP4) also incorporates the 2010 document *Growth without Gridlock: A Transport Delivery Plan for Kent*, which acted as a lobbying document to the government for infrastructure improvements. Therefore, LTP4 is both a policy document and sets KCC’s priorities for transport at strategic, countywide and local levels. LTP4 has five outcomes for transport supported by five policies that have been based on the Government’s National Transport Goals as set out in the 2009 guidance for Local Transport Plans.

It has been made clear within LTP4 that all schemes listed as a priority will undergo their own Equality Impact Assessment (and likewise environmental assessments, as well as planning, etc.) as the schemes are progressed.

Aims and Objectives

The key ambition of LTP4 is “To deliver safe and effective transport, ensuring that all Kent’s communities and businesses benefit, the environment is enhanced and economic growth is supported.” This is so as to facilitate the safe transport of people and goods within and through Kent, providing a transport network of all modes, which enables access to the best employment, education, retail, leisure and health services in the county. This ambition will be realised through five overarching policies that are targeted at delivering specific outcomes:

Outcome 1: Economic growth and minimised congestion

Policy: Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population

Outcome 2: Affordable and accessible door-to-door journeys

Policy: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services.

Outcome 3: Safer travel

Policy: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks.

Outcome 4: Enhanced Environment

Policy: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.

Outcome 5: Better health and wellbeing

Policy: Provide and promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality.

Beneficiaries

The delivery of the outcomes outlined in LTP4 will generally have a positive impact for all Kent residents, commercial operations and also tourists as transport network improvements will improve their experience of Kent. The delivery of improved transport infrastructure and public transport will increase accessibility to key services, jobs and education. The schemes will also support economic growth in the county by unlocking housing and commercial development allowing for job creation in Kent. This will be particularly beneficial to resident within East Kent where particularly high unemployment rates occur. Overall, carrying out the screening grid has identified that a number of groups will benefit from the aims of the policy. For example, it is clear that individuals with less access to a private car (such as the elderly and young people) will benefit from promotion of modes of transport that are different from a car in terms of affordability and accessibility. Those residents who are unable to drive (such as those with a disability), will benefit from improved travel options and this will also benefit carers across Kent. Due to the nature of their travels and independence from a car, women will also gain from affordable and improvement transport. Some of the benefits will be greater within some protected characteristic groups due to their greater use of certain transport systems.

Information and Data

As of 2014, the current estimated population for Kent is 1,510,400³. Going forward the population growth for Kent is expected to rise due to natural increase (more births than deaths) and addition more people moving into Kent than leaving. Analysis of 2011 census data about equality and diversity in Kent has been undertaken to better understand the demographics of the Kent population and the impact the Local Transport Plan will have. Focus has been made on groups that tend to rely on public transport, with the access of a car being limited.

³ <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/population-and-census>

Equality and diversity data from 2011⁴ shows that:

- Kent has an ageing population, as estimates indicate the number of 65+ year olds is forecast to increase by 55% between 2013 – 2033, however the proportion of population aged under 65 is only forecasted to increase by 6.9%.
- There are more female residents in Kent than male. In 2014, this equated to 51% and 49% (770,300 females and 740,100 males).
- 93.7% of Kent residents are white, compared to 6.3% BME residents.
- The 2011 office labour market statistics census data for Kent has the following statistics⁵:
 - A. The number of males and females (16+) owning a car or van, or having access to these within households, (including company vehicles that are available for private use): 91% of males vs 88% of females.
 - B. The car or van availability by gender and for those who consider they have a long-term health problem or disability: 86% of males vs 83% of females.
 - C. The number of females (16+) with a disability of which there are no cars or vans in the household: 17% compared to 12% of males.
- KCC Road Casualties in Kent (Annual Review 2014)⁶ – there was an increase in the number of people killed or seriously injured (KSI) compared to 2013 of 11% (594 KSIs increasing to 658 KSIs).
- Casualty data for Kent roads between 2012-2014, shows there are generally more male casualties than females across all age groups⁷:
 - A. 0-16, there were 1,861 casualties of which 57% were male and 43% female.
 - B. 17-24, there were 4,126 casualties of which 58% were male and 42% were female.
 - C. 25-64, there was a total of 10,029 casualties, which is the largest out of all age sets of which 58% were male and 42% female.
- According to the Kent Public Health Observatory,⁸ the percentage of adults in Kent currently classed as physically inactive is 28.1%. Currently 56.3% of the adult population meet the physical activity guidelines of 150mins per week to improve or maintain health.
- In addition, the Kent Joint Strategic Needs Assessment (Kent JSNA) showed that obesity is at 64.6%, which translates into 771,476 individuals who are 16+. This is particularly relevant as one of the outcomes of LTP4 is

⁴ <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/equality-and-diversity-data>

⁵ DC3407EW - Long-term health problem or disability by car or van availability by sex by age
<https://www.nomisweb.co.uk/census/2011/dc3407ew>

⁶ http://www.kent.gov.uk/__data/assets/pdf_file/0020/11819/Personal-injury-crashes-in-Kent.pdf

⁷ Transport Intelligence Team: Casualty data 2012-2014 against age and gender

⁸ <http://www.kpho.org.uk/joint-strategic-needs-assessment/jsna-behaviour-and-lifestyle/jsna-physical-activity>

to provide and promote active travel choices, therefore, helping to tackle a national issue.

- The ONS 2011 Census Analysis - Method of Travel to Work in England and Wales Report⁹ - found that in the South East 66.8% use road vehicles as a method of travelling to work, however only 12.1% use public transport and 13.9% choose to walk or cycle.
- Using the ONS 2011 Census to break down method of travel to work by age (Age 16 – 65+) and gender shows in Kent that¹⁰:
 - A. 14% of females travel to work using active travel compared to 10% of males in the county choosing to travel by bicycle or foot, thereby males will further benefit from outcome five of the policy as it's promoting active travel.
 - B. 13% of males choose to travel by rail, bus, minibus or coach. The female population comes out slightly lower with 12%.
 - C. 62% of males either use a car or van to travel to work or are a passenger. The number of females under the same criteria comes to 63%. This data is particularly relevant bearing in mind the Local Transport Plan promotes improvements to road journeys and public transport, but also the cycleway network.
- For 2015-2016, September Quarter 2 the number of¹¹:
 - Older person's bus passes were 266,949
 - Disabled person's bus passes were 20,312
 - Disabled Person companion bus passes were 5,133
- According to a study conducted by Transport for London (TfL)¹², women are more likely to travel with buggies than men. This can therefore affect transport choices and so women may choose to travel by public transport to and from Kent. In addition, women tend to be more concerned than men about their personal safety are when travelling after dark. This could be relevant to Kent as some female Kent residents may choose to commute to London for work or simply may want to travel into London for leisure purposes.
- According to a study conducted by Transport for London (TfL)¹³, BME individuals are more likely to use buses than white individuals (although they are less likely to travel by bicycle). In addition they are more likely to express concerns for their safety and more likely to be injured in road accidents.

Involvement and Engagement

As part of a pre-consultation exercise, the Transport Strategy Team liaised and consulted with various officers across KCC, such as Education, Highways, Transportation and Waste in order to get their views about the proposed Local

⁹ http://www.ons.gov.uk/ons/dcp171766_299766.pdf

¹⁰ DC7101EW1a - Method of travel to work (2001 specification) by sex by age
<https://www.nomisweb.co.uk/census/2011/dc7101ew1a>

¹¹ Revenue and Capital Budget Monitoring for 2015-2016, Quarter 2 paper. Page 136

¹² <http://content.tfl.gov.uk/women.pdf>

¹³ <http://content.tfl.gov.uk/BAME-summary.pdf>

Transport Plan. Alongside this, an informal Member Task and Finish Group was set up, which consisted of one representative from each political party sitting on the Environment and Transport Cabinet Committee. District councils were extensively consulted regarding their own transport priorities and the presentation of information on their specific areas. In addition, the views of the Kent and Medway Economic Partnership (KMEP) were taken into account. KMEP is a federated area of the South East Local Enterprise Partnership (SELEP) consisting of district council, local business, and local educational representatives designed to drive forward economic growth.

The final draft of LTP4 was available for public consultation for a twelve-week period between Monday 8th August and Sunday 30th October 2016. During this period, a range of stakeholder groups were invited to respond to the consultation, including voluntary and community organisations such as Ashford Youth Hub, Dartford BME Community, Polish Association in Kent, and Royal National Institute for the Blind.

The consultation sought to gather the views and opinions of a range of stakeholders on the draft Local Transport Plan 4, including whether they agree with the priorities or think additional priorities should be included, and whether they have any comments on the EqIA and SEA.

Consultation Feedback

The consultation asked for feedback on the content of the draft LTP, including views on the proposed Ambition, Outcomes, Supporting Policies and transport priorities for the county. Overall, the consultation received over 500 responses.

The consultation responses showed general agreement with the draft LTP4, particularly the strategy parts of the document. The named transport priorities in the plan at all levels (strategic, Kent-wide and district) received a mix of responses but nevertheless there was a greater extent of agreement than disagreement. A number of amendments were also proposed by stakeholders including the district councils.

Following the close of the consultation, responses were reviewed and considered, with appropriate amendments made to the LTP4. A final version of LTP4 will be submitted to Environment and Transport Cabinet Committee and Cabinet in March 2017, and then full County Council for adoption in July 2017. A full summary of the amendments can be found in the “You Said, We Did” document accompanying LTP4 but the key changes are:

- The strategic priorities map has been updated so the bifurcation of the M2/A2 and M20/A20 is clearer and the labels match the revisions later on in the document.
- The supporting policy for Outcome 5 (Better health and wellbeing) has been changed to include a commitment to “provide”, as well as “promote”, active travel choices in line with the Active Travel Strategy.

- The splitting of the previous priority “Rail and Bus Improvements” into two separate priorities, one for rail and one for bus. Many respondents wanted more information on both the rail and bus networks and felt more emphasis on public transport provision was needed.
- The ‘Enabling Growth in the Thames Gateway’ has been amended to reflect the geography of the Thames Estuary Commission, including the whole of the north Kent coast.
- The cross-district priorities were previously displayed on a map but the consultation showed that the public did not fully understand what the schemes were without a description. Separately, respondents felt that there was a general lack of sustainable transport schemes in the draft LTP4. These cross-district priorities are targeted at sustainable transport and include initiatives to encourage modal shift. Therefore, they have been moved to a new section on Sustainable Transport in the ‘Countywide Priorities’ section. Additionally, a section has been added to explain the importance of travel within Kent and the schemes that will deliver benefits across district boundaries.
- The transport priorities section in the consultation draft was divided into ‘Strategic’, ‘Kent-wide’ and ‘District’ level schemes. In the consultation respondents questioned whether these were in a priority order, and the use of the term ‘Kent-wide’ for priorities such as highway maintenance was confusing when also categorising some of the strategic priorities as ‘countywide’. Consequently, in this section the first page has been amended to introduce the three geographical levels of transport priorities (which are now called ‘Strategic’, ‘Countywide’ and ‘Local’) Some of the ‘Strategic’ priorities have also been highlighted as being of national importance, reflecting feedback from key stakeholders including the Port of Dover.
- A new section on Public Rights of Way has been added as a countywide priority. This was requested in the consultation and now the links between highways, Public Rights of Way, public transport and active travel are better reflected.
- There were many suggestions for new priorities, which have all have been considered. Potential schemes that are feasible have been added to the district maps.
- A new section has been added to signpost the Strategic Environmental Assessment and Equalities Impact Assessment to explain what they are.

This EqIA has been reviewed and updated following the feedback received during the consultation and taking into account the changes made to LTP4.

Feedback on the EqIA from the consultation

The consultation included a question asking for views and comments on the draft EqIA. A total of 26% of respondents gave a view on the EqIA, and much of

the feedback was regarding the principle of the assessment. This includes positive comments, such as one Sevenoaks district resident stating:

“An excellent document, which in my opinion addresses all of the issues.”

Comments relating to specific protected characteristics included that:

- Paid carers are increasingly unable to get to their clients owing to traffic congestion.
- Air pollution disproportionately impacts on the health of residents in the lower socio-economic bands/children/pregnancy.
- More consideration needs to be given to those without access to the private car.
- Cycling is the most viable alternative to the car, and requires more recognition in the EqIA.

There were also concerns about issues such as pavement parking, disabled access to railway stations, and footway maintenance. Following these comments, and similar comments received elsewhere in the consultation, it was deemed appropriate to strengthen commitments in LTP4 to active travel, and make clear reference to the ‘Access for All’ programme that facilitates disabled access at railway stations.

LTP4 has taken a holistic approach to transport in Kent and so whilst there is an emphasis on economic growth there is also a commitment to promote affordable and accessible transport, as well as providing opportunities for active travel. LTP4 commits to ensuring the required assessments, including EqIA and environmental assessments, are completed for each scheme as they progress. This will ensure that assessment of impacts on protected characteristics occurs when the scheme is at an appropriate level of development. It is in this way that the impacts commented on in the consultation will be mitigated. Likewise, any changes to daughter documents of LTP4 (such as footway resurfacing policy) would have an EqIA too.

Initial Screening

Potential Impact

After completing an initial assessment, it was clear the new Local Transport Plan and its infrastructure proposals will have an impact on Kent Residents.

Adverse Impact:

After completing the initial screening grid, it indicated that LTP4 will not have a significant negative impact on any of the protected characteristics. As stated earlier, individual schemes (example two of the strategic priorities in the Plan are a new Lower Thames Crossing and solution to Operation Stack) will be subject to an individual Equalities Impact Assessment as the schemes are developed and taken forward for delivery to ensure that no protected characteristics are adversely impacted.

The consultation was tailored to ensure that a range of people with protected characteristics, and groups representing them, had the consultation specifically promoted to them. This is so we could take their views into account and revise

LTP4 and this EqlA accordingly. KCC's Inclusive Communication Policy was followed so that those members of the public that have a disability, for example visual impairments or learning disabilities, were able to access the information in alternative formats.

Positive Impact:

The objectives and aims of LTP4 through the delivery of schemes will promote a better quality life for all residents in Kent by providing a transport network of all modes that enables access to jobs and services within the county. Therefore, it will benefit the overall needs of residents within Kent.

The older generation and families with younger children tend to rely on public transport, and therefore will benefit from more affordable and accessible transport solutions (bus and rail) that will enable them to enjoy their journeys throughout Kent, for example through accessing jobs and education services. The provision and promotion of active travel choices will potentially benefit all residents' health and well-being, but equally reducing congestion and pollution will benefit road users. Disabled people, who rely on public transport, will also be a beneficiary.

JUDGEMENT

Option 2 Full EqlA

The revised LTP4 will be adopted in July 2017 by County Council, subject to comments by Environment and Transport Cabinet Committee and Cabinet in March 2017.

Action Plan

This EqlA assesses the impact of LTP4 in its own right. EqlAs have not been completed for the individual schemes detailed within LTP4 but will be carried out as those schemes progress towards delivery, ensuring that they are at an appropriate stage of development so that an EqlA is meaningful and changes can be made to the design in response to the assessment. Likewise, any changes to existing policies that sit below LTP4 and aid its delivery (such as the Freight Action Plan) will be subject to their own EqlA.

The Action Plan (see overleaf) addresses how to meet the needs of protected characteristic groups during the lifetime of LTP4.

Protected Characteristic	Observations made	Action to be taken	Expected outcomes	Owner	Time Scales	Cost Implications
Age	<ul style="list-style-type: none"> • Kent has an ageing population. • Older Kent residents are: less mobile; less likely to use independent travel; have greater concerns with safety. 	<ul style="list-style-type: none"> • Ensure the elderly and young can access future consultations. • Ensure there are alternative formats of new transport information. • Include design features for those with limited mobility (e.g. dropped curbs). • Include design features for those with safety concerns (e.g. well-lit pedestrian paths). 	<p>The LTP's five outcomes deliver a net benefit for all members of the community:</p> <p>Outcome 1) Economic growth and minimised congestion</p> <p>Outcome 2: Affordable and accessible door-to-door journeys</p> <p>Outcome 3: Safer travel</p> <p>Outcome 4: Enhanced Environment</p> <p>Outcome 5: Better health and wellbeing</p>	<p>Director of Highways, Transportation and Waste – Roger Wilkin</p> <p>Director of Environment, Planning and Enforcement – Katie Stewart</p>	Ongoing	Will vary dependent on the individual scheme or policy.
Disability	<ul style="list-style-type: none"> • Disabled Kent residents are: less mobile; less likely to use independent travel. 	<ul style="list-style-type: none"> • Ensure the disabled can access future consultations and developments • Ensure there are alternative formats of 				

		<p>new transport information</p> <ul style="list-style-type: none"> • Include design features for those with limited mobility (e.g. dropped curbs) • Work with other transport operators to ensure they accommodate disabled users. For example, in January 2017, the Supreme Court ruled that bus drivers must try to persuade other passengers to make room for wheelchair users¹⁴. 	All schemes and policies are expected to have regard to achieving these outcomes.			
Race	<ul style="list-style-type: none"> • BME Kent residents are more likely to: be dependent on public transport 	<ul style="list-style-type: none"> • Ensure BME communities can access future consultations and developments 				

¹⁴ <https://www.theguardian.com/society/2017/jan/18/court-backs-wheelchair-user-who-was-stopped-from-boarding-bus-yorkshire-leeds>

	<p>systems; be concerned with safety.</p>	<ul style="list-style-type: none"> • Ensure there are alternative formats of new transport information (including other languages) 				
Gender	<ul style="list-style-type: none"> • Female residents are: less likely to use independent travel by car; be concerned with safety; make journeys with additional dependents; have multiple stages to their journeys. • Male residents are more likely to suffer injuries or fatalities in a car accident; statistically undertake longer journeys. 	<ul style="list-style-type: none"> • Ensure all genders can access future consultations and developments • Ensure alternative formats of new transport information • Include design for those with safety concerns (e.g. well-lit pedestrian paths) 				

Monitoring and Review

This EqlA has been reviewed and updated following the public consultation. The Local Transport Act 2008 affords Local Transport Authorities (including KCC) the ability to review their Local Transport Plans when deemed necessary, rather than the strict 5-year periods as previously specified. Therefore, if it is appropriate to update or revise LTP4 during the time period 2016 – 2031 this EqlA will also be reviewed and updated.

Sign Off

I have noted the content of the Equality Impact Assessment and agree the actions to mitigate the potential adverse impacts that have been identified.

Senior Officer

Signed:



Name: Joseph Ratcliffe

Job Title: Transport Strategy Manager

Date: 14 February 2016

Head of Service

Signed:



Name: Tom Marchant

Job Title: Head of Strategic Planning & Policy Date: 14 February 2017