

**KENT COUNTY COUNCIL  
EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)**

**Directorate:** Growth, Environment and Transport

**Name of policy, procedure, project or service:** Thanet Parkway Railway Station

**What is being assessed?** The provision of a new Railway Station in Thanet called Thanet Parkway.

**Responsible Owner/ Senior Officer:** Joe Ratcliffe, Transport Strategy Manager

**Date of Initial Screening:** 11/12/13 and updated 07/05/19

<b>Version</b>	<b>Author</b>	<b>Date</b>	<b>Comment</b>
1	RM	11/12/13	
2	SF	28/11/14	
3	FQ	28/01/15	Updated to reflect actions taken for the initial public consultation.
4	BS	10/11/16	Updated in preparation for New Station Fund bid and second consultation.
5	KP	23/11/16	Updates to previous version.
6	KP	09/11/18	Updates following further design and consultation.
7	SF	10/05/19	Updates following design changes.
8	SF	07/07/19	Updates following design changes

## Screening Grid

Characteristic	Could this policy, procedure, project or service, or any proposed changes to it, affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact <b>HIGH/MEDIUM</b> <b>LOW/NONE</b> 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
<b>Age</b>	<p>YES.</p> <p>The 2015 consultation identified the following potential impacts:</p> <ul style="list-style-type: none"> <li>Given the station is out of town, some elderly and young people may not drive and therefore be disadvantaged compared to those who do.</li> <li>Elderly people may be concerned with their security if the station is unstaffed.</li> </ul> <p>The respondents to the 2017 consultation also expressed concern about it being unstaffed.</p>	<b>Medium</b>	<b>Medium</b>	<ul style="list-style-type: none"> <li>We will ensure the design of the station will be well connected with local bus routes, offer a park and ride facility and have cycle and pedestrian access point.</li> <li>We will be incorporating CCTV and lighting into the design of both the car park and station, therefore improving safety at the station. We will have help points for any issues that may arise.</li> <li>Following an assessment of demand the station may be manned at peak times. Further assistance would therefore be available.</li> </ul>	Yes. The scheme promotes improved accessibility for everyone. People who do not have access to private car will be able to access public transport to the station. The station aims to improve the economic prosperity of the area and improve access to employment and training opportunities for all.
<b>Disability</b>	<p>YES.</p> <p>The 2015 consultation identified the following potential impacts:</p> <ul style="list-style-type: none"> <li>During construction: dust, pollution and airborne</li> </ul>	<b>Medium</b>	<b>Medium</b>	<ul style="list-style-type: none"> <li>The construction methods, working hours and mitigation measures to minimise pollution during the construction period will form a Construction</li> </ul>	Yes. Improvements to public transport services will support the independence of all people. Passengers requiring assistance will be able to book this service

	<p>contaminants may have an impact on people with respiratory problems.</p> <ul style="list-style-type: none"> <li>• Safety concerns as station is unstaffed.</li> <li>• Access to and between the platforms.</li> </ul> <p>The 2017 consultation also reported concerns around safety of an unmanned station.</p> <ul style="list-style-type: none"> <li>• Boarding and alighting trains may be more difficult at an unmanned station.</li> </ul>			<p>Management Plan, to be agreed through Planning. Such mitigation could include dampening down construction dust.</p> <ul style="list-style-type: none"> <li>• There will be CCTV, lighting and help points to alleviate safety concerns.</li> <li>• Following an assessment of demand the station may be manned at peak times.</li> <li>• Lifts will be available for access between the platforms.</li> <li>• A subway will be provided to provide access between platforms, this option was favoured by disabled users at the public consultations as it allowed easier access than a footbridge.</li> </ul>	<p>as they can at other unstaffed stations across the county.</p>
<b>Sex</b>	<p>YES. The 2015 consultation identified the following potential impacts:</p> <ul style="list-style-type: none"> <li>• Safety concerns, as station will be unstaffed. This can be supported with comparable data below from Transport for London showing that women feel more vulnerable when travelling after dark.</li> <li>• Pregnant women may also feel vulnerable if the station is unstaffed.</li> </ul>	<b>Low</b>	<b>Medium</b>	<ul style="list-style-type: none"> <li>• There will be CCTV, lighting and help points to alleviate safety concerns.</li> <li>• Following an assessment of demand the station may be manned at peak times.</li> </ul>	<p>Improvements to public transport services will support the independence of all people.</p>

<b>Transgender/ Gender identity</b>	YES. <ul style="list-style-type: none"> <li>Safety concerns, as station will be unstaffed.</li> </ul>	None	Medium	<ul style="list-style-type: none"> <li>There will be CCTV, lighting and help points to alleviate safety concerns.</li> <li>Following an assessment of demand the station may be manned at peak times.</li> <li>Consultation will target the Transgender community to inform any action that needs to be taken.</li> </ul>	No
<b>Race</b>	YES. <ul style="list-style-type: none"> <li>Given the station is out of town, people who do not drive may be disadvantaged compared to those who do. The Department for Transport 2012 statistics show that the level of car ownership is lower for black and minority ethnic (BME) groups.</li> <li>Safety concerns, as station will be unstaffed.</li> </ul>	Low	Medium	<ul style="list-style-type: none"> <li>There will be CCTV, lighting and help points to alleviate safety concerns.</li> <li>Following an assessment of demand the station may be manned at peak times.</li> </ul>	Improvements to public transport services will support the independence of all people.
<b>Religion or belief</b>	YES. <ul style="list-style-type: none"> <li>Safety concerns, as station will be unstaffed.</li> </ul>	None	Medium	<ul style="list-style-type: none"> <li>There will be CCTV, lighting and help points to alleviate safety concerns.</li> <li>Following an assessment of demand the station may be manned at peak times.</li> </ul>	No
<b>Sexual orientation</b>	YES. <ul style="list-style-type: none"> <li>Safety concerns, as station will be unstaffed.</li> </ul>	None	Medium	<ul style="list-style-type: none"> <li>There will be CCTV, lighting and help points to alleviate safety concerns.</li> <li>Following an assessment of</li> </ul>	No

				demand the station may be manned at peak times.	
<b>Pregnancy and maternity</b>	<p>Yes.</p> <ul style="list-style-type: none"> <li>Boarding and alighting trains may be more difficult at an unmanned station for people with pushchairs.</li> <li>Pregnant women may feel vulnerable if the station is unstaffed.</li> </ul>	None	Medium	<ul style="list-style-type: none"> <li>There will be CCTV, lighting and help points to alleviate safety concerns.</li> <li>Following an assessment of demand the station may be manned at peak times which could assist with access.</li> </ul>	No
<b>Marriage and Civil Partnerships</b>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	N/A	N/A	<ul style="list-style-type: none"> <li>N/A.</li> </ul>	N/A
<b>Carer's responsibilities</b>	<p>YES.</p> <ul style="list-style-type: none"> <li>Carer's may be required to provide greater levels of assistance given the station in proposed to be unmanned.</li> </ul>	None	Medium	<ul style="list-style-type: none"> <li>Following an assessment of demand the station may be manned at peak times which could assist with access.</li> </ul>	No

## Part 1: INITIAL SCREENING

**Proportionality** - Based on the answers in the above screening grid what weighting would you ascribe to this function – see Risk Matrix

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

### State rating & reasons

The scheme will have a medium positive impact on some groups (Age, Disability) and a low positive impact on others (Race, Sex) as it improves their access to public transport. It will also have a medium negative impact on all of the protected groups (due to safety concerns), however mitigating measures have been provided to address the negative impacts. The scheme will act to improve accessibility to rail services in Thanet, delivering benefits for all residents and businesses in East Kent.

### Context

Kent County Council (KCC) has identified the delivery of Thanet Parkway Railway Station as a priority to support economic growth in Kent. The delivery of a Parkway Station has been a top priority for KCC since 2010, with the ambition to deliver the station first mentioned in *Growth without Gridlock* (December 2010) and the third *Local Transport Plan* (2011-2016) and the *Rail Action Plan for Kent* (April 2011). The delivery of this station continues to remain of substantial importance to the County Council and is a countywide strategic priority in KCC's new *Local Transport Plan 4: Delivering Growth without Gridlock* (2016-2031), which was adopted in 2017 following a full public consultation and Strategic Environmental Assessment.

Following site appraisal and scheme development work, the proposed railway station will be situated along the existing railway line, close to the village of Cliffsend. It has been located to the east of a triangle of land bounded by the A299, A256 and the railway line. This minimises the land take necessary for the station. A new dedicated junction and access road will be built from the A299 Hengist Way.

The design will include a two-platform station, station forecourt, car parking, bus stops, drop-off, pick-up/ taxi drop off point. The station will be served by High Speed and Mainline services.

Consultation is seen an essential tool for this project, to understand public opinion and to inform this equality analysis and subsequently inform the design and plans proposed. Consultation and engagement have therefore been carried out throughout the lifespan of the scheme.

An initial eight-week public consultation was undertaken in 2015 on the initial concept design. A further pre-planning consultation on the detailed design and station layout was held from 25<sup>th</sup> January to 19<sup>th</sup> March 2017. The results of these consultations were used to inform the design in the planning application.

A planning application was submitted for the scheme in May 2018. A statutory 28 days consultation was completed by KCC Planning Applications Group following this submission. It was deemed that designing this station with a footbridge to gain access between the platforms would have a negative impact on the visual landscape (due to the height of the structure over and above the height of the embankment). As such a new proposal for the station, utilising an existing railway subway is being produced for a planning application to be resubmitted.

Additional engagement was carried out in March 2019, and October/ November 2019 to understand the views of local residents and disability and age characteristic groups on the use of a subway instead of a footbridge. (See Involvement and Engagement section). Following the planned submission of a revised planning application, another statutory consultation period will take place in winter 2019.

### **Aims and Objectives**

The project aims to address existing and future weaknesses in Thanet's rail and wider transport system to ensure that the development of the transport network keeps pace with the rate of economic growth predicted for the South East. The County Council's aims for East Kent are to:

- Improve journey times on the High Speed service;
- Increase the attractiveness of East Kent to employers (particularly those who wish to relocate out of London);
- Support the economy by unlocking new economic development opportunities;
- Reduce environmental impacts for local residents; and
- Improve access to employment opportunities in Thanet (including by bringing prosperity out of London).

Thanet Parkway directly supports these aims and its objectives have been developed to contribute towards these aims as well as to form targets and outcomes for the scheme.

The aim of the project is to deliver a new railway station in Thanet along the existing rail line between Minster and Ramsgate. The objectives are to:

- Accelerate the pace of housing delivery in Thanet (1,600 – 3,200 additional homes delivered between opening year and year 30).
- Positively contribute to economic growth by attracting higher skilled workers to the area (measured by census data showing change in educational attainment of the population).

- Stimulate the creation of additional jobs by encouraging business location and expansion decisions based on the existence of the new station and journey times to London of around 1 hour (400 – 800 additional jobs from opening year to year 30).
- Generate over 50,000 new rail journeys from first full operational year (2022).
- Increase week day usage of the new station year on year from 412 in 2022 to 456 in 2026.
- Provide rail access to all users from Thanet to London with a journey time of around one hour.
- Provide commuters with alternative access to the area for journeys that might otherwise be made on the local and strategic highway network from opening year and increasing by 2031.

### **Beneficiaries**

- This scheme is intended to benefit residents (representing all of the characteristic groups) and businesses within East Kent by providing improved access to both jobs and labour pools.
- The delivery of a railway station at the proposed location will improve access to employment sites such as Manston Business Park, the former Manston Airport site (whatever its future use), Discovery Park Enterprise Zone and Euro Kent development.
- The improved accessibility to employment opportunities will help to tackle the higher than Kent average levels of unemployment experienced in Thanet.
- Ramsgate station is unable to provide the required car parking provision, with cars currently parking inappropriately in residential areas. Residents in close proximity to Ramsgate station will therefore benefit as Thanet Parkway station will help to mitigate against a growth of inappropriate on-street parking which could occur due the future growth in rail demand.
- There will also be benefits for the wider Kent population. The provision of the station will give people travelling to/from Thanet greater choice of where to travel to/from and will better connect Thanet with other areas of Kent, as well as providing additional station capacity to accommodate increasing passenger demand.
- Delivering improved rail connectivity will help promote a modal shift from road to rail and more sustainable means of transport. Encouraging a modal shift from road to rail will help to mitigate the negative impacts of increased car use in Kent such as congestion and air pollution.

### **Information and Data**

Analysis of data about equality and diversity in Kent has been undertaken below to gain a better understanding of the demographics of Thanet, including the ward areas of Cliffsend and Pegwell, in which Thanet Parkway will be located.

The population of Kent is expected to rise, as generally there are expected to be more births than deaths and, in addition, more people moving into Kent than leaving the county. Kent's population is also ageing, and a key contributor is increased life expectancy.

Kent County Council produces ward profiles and population estimates<sup>1</sup>. These provide key statistics for the area:

- The total population for Kent is estimated to be 1,554,600 (September 2018), with a split of 51% female and 49% male.
- Between 2006 and 2016, Kent's population grew by 10.4% and it is expected to rise by a further 22.2% by 2036. In the same period, the population of Thanet is expected to rise by 27.0%.
- Based on 2016 population estimates, the ward of Cliffsend and Pegwell made up 3.5% of the total Thanet population.
- The ward of Cliffsend and Pegwell has a higher proportion of female residents (52.3%) compared to Thanet (51.5%) and Kent as a whole (50.9%).
- 17.6% of residents in Kent have an illness or condition which limits their day to day activities in some way. Within Thanet, this figure is 23.4% (2011 census) and in Cliffsend and Pegwell the figure is 21.5%. This indicates the station is more likely to be used by users with a condition which limits their day to day activities than if it were located elsewhere in Kent.
- 2011 census data shows that the largest ethnic group in Kent is white (93.7%), and 6.6% are of Black Minority Ethnic (BME) origin. The largest single BME group is Indian at 1.2% of the total population. In Thanet the BME population falls to 4.5% and falls further to 3.7% in Cliffsend and Pegwell.
- Again from census 2011, 62.5% of Kent's residents describe themselves as Christian, with the largest non-Christian religion being Muslim (1%). In Thanet, 61.4% described themselves as Christian, 28.6% with no religion, 7.41% did not state a religion, and the remainder were a range of other religions. In Cliffsend and Pegwell 66.9% of people describe themselves as Christian, whereas 0.6% of people describe themselves as Muslim (and same proportion describing themselves as Hindu). 23.7% declare no religion.
- Looking at statistics for rail usage in Great Britain as a whole, in February 2015 55% of adults had used a train at least once in the previous twelve months, with this rising to 66% for adults in the south east. Older age groups and those working in manual occupations were less likely to have

---

<sup>1</sup> KCC Business Intelligence; <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/summary-of-kent-facts-and-figures#tab-2>

used rail, whereas those living in the south east and in a higher income bracket were more likely to have made a train journey<sup>2</sup>.

- 220m rail journeys were made to/from the south east region in 2015/16 and a further 84m within the region<sup>3</sup>.
- Unemployment in Thanet for September 2018 was 3.6%, which is substantially higher than Great Britain figure (2.2%) and Kent figure (2.0%). Unemployment in Thanet has increased by 44% since September 2017. The rate is much higher for those in the 18 – 24 age group at 7.7%.
- The ward the station is in, Cliffsend and Pegwell, had 1.6% of all economically active people (16 – 64) unemployed in 2017<sup>4</sup>. The delivery of Thanet Parkway will widen job opportunities through better accessibility to the London and wider Kent.
- Due to a lack of transport information for East Kent, research from London was used to indicate transport types for various equalities groups. A report by Transport for London (TfL, 2015)<sup>5</sup>, identified a number of barriers to using public transport, including that women are more likely to be worried about their personal safety and take precautions against crime (such as sitting next to other people). In London, 61% of women said that the frequency of their travel is affected 'a lot' or 'a little' because of concerns about crime and antisocial behaviour. Although this data cannot be directly applied to Kent because of different demographics and travel opportunities between London and the county, some of the typical barriers to travel can be inferred to be experienced by women across the country.
- Like London, women make up 51% of Kent's population<sup>6</sup>.
- Based on 2011 census data, 3.1% of people in the Cliffsend and Pegwell ward travel to work by rail, with this figure rising to 3.9% of people in Thanet. This compares to an average of 9.2% in the KCC area<sup>7</sup>. Delivering Thanet Parkway railway station at the proposed location would greatly improve rail accessibility for residents of Cliffsend and Pegwell and the wider Thanet area.
- From the 2011 census, the district of Thanet has the lowest level of car ownership in Kent with 29.8% of households having no access to car,

---

<sup>2</sup> Department for Transport (2015). Public attitudes towards train services: 2015 summary.

<sup>3</sup> Office of Road and Rail (2017). Rail Statistics Compendium Great Britain 2016-17 Annual.

<sup>4</sup> Claimant count data.

<sup>5</sup> Transport for London (2015) Understanding the travel needs of London's diverse communities, available at: <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities.pdf>

<sup>6</sup> Kent County Council. Area Profiles.

[http://www.kent.gov.uk/your\\_council/kent\\_facts\\_and\\_figures/area\\_profiles.aspx](http://www.kent.gov.uk/your_council/kent_facts_and_figures/area_profiles.aspx)

<sup>7</sup> Kent County Council (2011). Area Profiles.

[http://www.kent.gov.uk/your\\_council/kent\\_facts\\_and\\_figures/area\\_profiles.aspx](http://www.kent.gov.uk/your_council/kent_facts_and_figures/area_profiles.aspx)

compared to 20% in the KCC area as a whole<sup>8</sup>. The number of households with access to two or more cars is also relatively low in Thanet at 26%, relative to the Kent average of 37.3%. So, whilst there may be access to one car in a household, this may leave other household members without a car, given the average household size of 2.2 in Thanet.

- The Department for Transport National Travel Survey statistics (updated July 2018<sup>9</sup>) shows the number of adult households (aged 17+) without a car/van split by ethnic group. In 2017, in the White ethnic group 17% of adults were in households without access to a car/van. In comparison, 44% of adults in the Black/African/Caribbean/Black British ethnic group were in households without access to a car/van. This shows the disparity of car access between different ethnic groups.

## **Scheme Development**

The Thanet Parkway Railway Station scheme comprises of a two-platform station, station forecourt, car parking, bus stops and pedestrian and cycle access.

Following an extensive option selection process (and consultation in 2015 and 2017), the original design for the scheme allowed for access between the platforms to be via a pedestrian footbridge over the track, that was accessed by both lifts and stairs on either side. The footbridge was located in the centre of the platforms, with the focus of activity for the car park centred around a forecourt area central to the footbridge.

This design was therefore submitted in the original planning application by KCC in May 2018. However, this solution faced challenge in the planning process, owing to the visual intrusiveness of the proposed structures and the subsequent impact on the landscape. It was noted that the two lift towers and footbridge structures, proposed to be constructed on the existing embankment were to be 9 meters high.

Consequently, a decision was taken to revise the access proposal, which led to the progression of 2 further options considered in respect of the main station entrance:

1. Construction of a new subway.
2. Use/refurbishment of the existing subway.

A new subway was deemed to be unviable for several key reasons:

---

<sup>8</sup> Kent County Council (2013). 2011 Census: car and van availability in households in Kent. <https://shareweb.kent.gov.uk/Documents/facts-and-figures/Population-and-Census/2011%20Census/2011-census-car-availability.pdf>

<sup>9</sup> Department for Transport (2013). Adult personal car use and trip rates by ethnicity group. Great Britain: 2012 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/9972/nts0707.xls](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/9972/nts0707.xls)

- Logistics and land ownership – the land required to facilitate the construction falls outside of the KCC/Network Rail land boundaries on the south side of the railway line.
- Railway line closures – Construction would have a significant impact on the operational railway as lines would need to be closed, this is estimated as an additional 5 X 27 hours.
- Utilities – There is a water main located in the station footprint which would need to be rerouted at significant expenditure and impact to the area.
- Disruption to residents – Lengthy construction phase and high capital construction expenditure, requiring lighting both day and night.

Following liaison between project stakeholders (KCC, Network Rail and Southeastern) and some early wider engagement (see Involvement and Engagement section), the option of utilising the existing subway and install steps/lifts (including refurbishment) in order to offer a sustainable, safe access solution was then progressed. This proposal was regarded as being the most beneficial for the following reasons:

- Less visually intrusive/impact to the local environment.
- Long term solution, offering 24/7 uninterrupted access across the railway from platform to platform.
- Compatible with cycle users, wheelchairs and scooters.
- Existing subway onsite could be utilised and improved to offer a sustainable, safe access solution.
- No utilities needed to be moved.
- Minimal disruption to local-residents during the construction phase.
- No additional land required.

The main entrance to Thanet Parkway Station is therefore now proposed to be via the existing subway located at the east end of the station. The subway will be refurbished, light and contain CCTV.

## **Involvement and Engagement**

This section documents the consultation and engagement that has taken place throughout the history of this scheme and how it has informed this EqIA. Discussion of the impact on the protected groups and mitigation can be found in the *Potential Impact* section.

An eight-week public consultation took place in 2015 which focused on the concept design of the station. The aim of the public consultation was to have early engagement with all stakeholders and the public to get their views on developing the station, and share information on the proposal and any potential impacts/opportunities. Below are the key issues raised;

Given the proposed station location is out of town, the consultation also identified young people, elderly people or people with disabilities who do not have access to a car may not be able to access the station.

Safety concerns were raised by a number of protected characteristic groups (notably age, sex, disability characteristic groups) given the station is planned to be unstaffed. Concerns were raised for safety at the station, and in the areas around the station (car park, and connections into the station).

Furthermore, responses to the consultation raised the potential impact of dust, pollution and airborne contaminants during construction on those with respiratory problems.

The consultation identified that older respondents (76+) would prefer access to platforms via lifts and access between platforms via a subway. In addition, disabled respondents also stated a preference for a lift and subway. However, more than twice as many people overall wanted access between platforms to be via a footbridge as opposed to an subway (44% vs 19%).

Key stakeholders (including Network Rail, Southeastern, Dover and Thanet District Councils) meet with KCC regularly to discuss, and contribute to, project development. This continued engagement ensures they can input representing their own stakeholders, which includes railway station users for Southeastern and Network Rail.

A second, pre-planning, consultation took place from 25<sup>th</sup> January until 19<sup>th</sup> March 2017. The proposals were available to the public online and in libraries, as well as at exhibition events in Cliffsend, Minster, Discovery Park and Ramsgate railway station. The consultation materials were also presented at meetings of interested Parish and Town Councils across Thanet and Dover districts. All consultation materials were available in alternative formats, including hard copy, by request.

The majority of respondents generally agreed with the proposals, but there were some concerns around design details. This included the proposed junction with the A299 (from a perspective of highway safety and reducing the speed of traffic on the main road) and the pedestrian access route (as it was felt the proposed pedestrian access would encourage more people to park in the residential streets to the south of the station). As with the 2015 consultation, similar issues around safety and being an unstaffed station were also raised.

Following the design changes brought about by the statutory planning consultation in 2018 further engagement with local residents, project stakeholders (Network Rail and Southeastern) and protected characteristic groups took place in 2019.

Prior to a formal design of the subway being produced, specific groups representing the disability and age characteristic groups were contacted to

ask for their members for comment and experience of how they feel about using subways.

<b>Groups Contacted;</b>
East Kent Association for the Blind
Thanet Over Fifties Forum
Thanet Disability Forum
Age UK – Thanet
Carers Support CDT
Hi Kent
Accessible
East Kent Mencap

Detailed comments regarding design improvements that can be made to subways to enhance the experience for visually impaired users were received from the East Kent Association for the Blind, who stated the following consideration should be considered in the design;

- Clear guidance to find and access the route with clear easy to read signage that has a matt finish and not a shiny finish to minimise glare.
- Clear demarcation for cyclists to minimise collisions
- Good quality even lighting using daylight bulbs or LEDs where possible
- Minimal auditory feedback from the tunnel structure which is then magnified by increased footfall. This can cause disorientation as the echo's give false positions of sounds.
- Even and clear surface underfoot. A change of surface at the beginning and end would be ideal particularly if there are roads immediately either side. This gives the individual time to prepare for changes in the walking patterns and behaviours of other members of the public as well as the auditory and visual information changes that occur when moving from one environment to another.
- A solid brick wall with a skimmed and painted surface will reflect sound very differently to a plastic facing over batons or another type of hollow surface. Many sight impaired people use the skill of echo-location to assist them with their orientation, some are consciously aware of this whilst others learn this sub-consciously. The way that sound reflects off surfaces of different porosity and depth will affect the experience, particularly in an environment such as a tunnel. The designers will ensure that they are fully aware of this effect and will consider the materials that they will be able to use given the current design of the build of the tunnel and cost implications for the upgrade.
- With these considerations in place the opportunity for people with a sight impairment to access the subway equitably is very high.

No further comment was received from other groups at this time. Following a design freeze, it is proposed that these groups will be contact again in November 2019, to allow another opportunity to comment on station design during the statutory consultation period of the revised application.

Southeastern as the Train Operating Company and voice of the passengers to use the service highlighted a concerns that; the new design may increase walking distance to the platforms as a result of the need to rearrange the station layout and car park, and that once users reach the platform, they will be at one end, as supposed to in the centre as previously planned. See the Impacts section for a discussion on impact for characteristic groups and mitigation.

On 10<sup>th</sup> October 2019, a public meeting was held in Cliffsend Village Hall where the new station design was presented. This was followed by an open Q&A session. The meeting was attended by members of the Parish Council and around 60 residents. No were no concerns raised regarding access to the station platforms via the subway, accessing the platforms at one end or accessibility generally as a result of the station and car park design. Concerns were raised regarding the safety and security of the station, echoing the consultations in 2015 and 2017.

Following submission of the revised planning application in November 2019, there will be another statutory consultation period (November/December 2019) in which stakeholders will have the opportunity to comment on the scheme.

### **Potential Impact**

The scheme is intended to improve access to the railway network and support economic development in Thanet. The scheme will support development sites in the area, such as Discovery Park Enterprise Zone and the former Manston Airport site. This will act to boost the east Kent economy, support the delivery of new jobs and housing, and therefore promote regeneration in the area.

When it opens, the new station is anticipated to generate around 115,000 trips annually, with approximately half of these being redistributed from other stations in the area. This is forecast to increase to over 142,000 by 2031 (10 years after opening).

### **Adverse Impact:**

#### **All groups**

During all consultation and engagement, people from all groups raised concerns that the station may feel unsafe given the out of town location and the fact it will be unstaffed.

In order to mitigate this identified impact, designs will incorporate CCTV, lighting and help points. Depending on demand, staff may be introduced to the station during peak hours, which help alleviate safety concerns, particularly during the darker, winter peaks. The decision on staffing levels will ultimately be taken by the train operating company, however discussion will take place with them. The scheme has been designed to include staff facilities (toilets, store room and staff car parking) to allow future provision of staff.

Safety concerns may be exacerbated given the design change to include the subway and as subways are often considered areas that attract anti-social behaviour.

As mitigation, the subway will also have lighting and CCTV and will remain open at either end (e.g. will have no fencing/screening in the vicinity), to reduce the perception feel of it being an enclosed area.

Concern was also raised that construction dust and airborne pollutants could have an impact on any user.

The project is subject to a full Environmental Impact Assessment (EIA), which identifies the potential impacts of construction and operation on the environment and suggests mitigation measures. These measures will be conditioned at the planning stage to ensure compliance. For submission of the 2019 application, the EIA found there would be a minor adverse impact from construction of the scheme on receptors (local dwellings etc). This will be mitigated against by compliance with best practice and the formulation of a Construction Management Plan by the contractor prior to construction. Best practices include measures such as, damping down surfaces to reduce airborne pollutants. This impact will only affect people during the construction phase (12 months). Once operational there will be no impact.

### **Disability**

Construction, dust pollution and airborne contaminants may have a particularly adverse impact on people with respiratory problems. This will be mitigated against as explained above.

Safety concerns may be felt more strongly amongst this group given the station is proposed to be unstaffed. (see above mitigation).

People who are visually impaired, have learning difficulties or have other print impairments such as dyslexia, may not be able to read signage and or station related information. To mitigate, all station signage and information will be produced in line with design best practice to ensure the station is accessible for all.

Given that the station is out of town, some less abled users may not be able to access the station by car. This will be mitigated against by provision in the station for access by different modes of transportation; e.g. cycle racks, bus stops, motorcycle parking, taxi drop off point and pedestrian access.

As highlighted by East Kent Association for the Blind, Echo affects can disorientate people with reduced eyesight in enclosed spaces such as subways. The subway will be designed to ensure compliance with requirements for visually impaired users at the detailed design stage.

The subway design will mean users will access the platforms at one end of the platform. This may mean longer walking distances along the platform than if the access to was central to the platform. In reorganising the station and car

park layout in the 2019 design iterations, priority was given to providing the shortest walking distances to the platforms possible for disabled users. Walking distances to the platforms are now equal to or shorter than the previous design. Options are being explored as to whether trains of differing lengths can stop at different points when held in the station, to reduce walking distance required along the platforms.

### **Age**

Safety concerns may be felt more strongly amongst this group given the station is proposed to be unstaffed. There is no specific mitigation proposed for this group over any other.

Given that the station is out of town, some elderly and young people may not drive and therefore be disadvantaged compared to those who do. This will be mitigated against by provision in the station for access by different modes of transportation; e.g. cycle racks, bus stops, motorcycle parking, taxi drop off point and pedestrian access.

Elderly people may not be as able to access information about the station on the internet during consultation events and operation. As part of the consultation process, consultation events were held so people could discuss their concerns and collect hard copies of consultation materials. Materials were also sent to local residents and could be requested in alternative formats (such as easy to read). The 2019 engagement also intends to send materials to local residents.

The subway design will mean users will access the platforms at one end of the platform. This may mean longer walking distances along the platform than if the access to was central to the platform. Walking distances to the platforms are now equal to or shorter than the previous design. Options are being explored as to whether trains of differing lengths can stop at different points when held in the station, to reduce walking distance required along the platforms.

### **Pregnancy/maternity**

The Subway design will mean users will access the platforms at one end of the platform. This may mean longer walking distances along the platform than if the access to was central to the platform. Walking distances to the platforms are now equal to or shorter than the previous design. Options are being explored as to whether trains of differing lengths can stop at different points when held in the station, to reduce walking distance required along the platforms.

### **Race**

Safety concerns may be felt more strongly amongst this group given the station is proposed to be unstaffed. There is no specific mitigation proposed for this group over any other.

Given the station is out of town, people who do not drive may be disadvantaged compared to those who do. The Department for Transport 2012 statistics show that the level of car ownership is lower for BME groups. This will be mitigated against by provision in the station for access by different modes of transportation; e.g. cycle racks, bus stops, motorcycle parking, taxi drop off point and pedestrian access.

People who do not speak English well may not be able to read station signage and or station related information at consultation events or during operational use. Station signage will be designed to be as simple to understand as possible. All consultation / promotional materials produced for the scheme can be translated upon request.

### **Sex**

Safety concerns may be felt more strongly amongst this group given the station is proposed to be unstaffed. This can be supported with comparable data from Transport for London showing that women feel more vulnerable when travelling after dark. There is no specific mitigation proposed for this group over any other.

There could potentially be some negative effects of the scheme on air quality and noise pollution during the construction phase of the project. This impact is being assessed as part of the Environmental Impact Assessment for the planning application in terms of effects on individual sensitive receptors.

### **Carer's responsibilities**

Given the station is unstaffed, carers may be required to provide greater levels of assistance than at a staffed station. This impact may be exacerbated given the entrance point to the station platforms is at one end. A review of demand and staffing levels and consideration of altering train stop locations could help to mitigate these points. Passenger help points will also be provided in the scheme.

### **Positive Impact:**

#### **All users**

The delivery of Thanet Parkway Railway Station is expected to have positive benefits for all residents and businesses in Thanet. The delivery of improved rail connectivity should help to achieve equal accessibility and opportunities for all.

### **Age**

Research has suggested that Kent has an aging population with the number of people over the age of 65 set to rise. Car or van ownership for pension households is lower than that for the average household in Kent. Pensioners are therefore expected to be more reliant on public transport (particularly bus services) than other adults. Similarly children and young people are also more reliant on the use of public transport to access services such as education.

The scheme is expected to increase accessibility for all ages, and will particularly benefit young and older residents in Kent who are more reliant on public transport.

The responses to the 2015 consultation showed that twice as many (44% vs 19%) respondents aged 76+ stated they would prefer access between the platforms via a subway as supposed to a footbridge, as it would negate the need to take a lift up two levels to cross the station. The 2019 design change therefore now meets this preference and is therefore a positive impact on this group.

### **Disability**

On average, there tends to be lower car ownership for people with a disability and a greater dependence on public transport. The delivery of Thanet Parkway will therefore benefit people with a disability by improving accessibility.

The station itself will be designed in a way to support accessibility of disabled people. The 2019 design prioritised the placement of disabled bays to enable the shortest possible walking distance to the platforms.

The responses to the 2015 consultation showed that a greater number of disabled respondents stated they would prefer access between the platforms via a subway as supposed to a footbridge, as it would negate the need to take a lift up two levels to cross the station. The 2019 design change therefore now meets this preference and is therefore a positive impact on this group.

### **Race**

The data above shows that the level of car ownership is lower for people of BME. The delivery of Thanet Parkway will therefore have a positive impact in improving access to public transport. This will particularly benefit households with no car access.

## **JUDGEMENT**

**Option 3 – Full Impact Assessment                      YES**

The screening and subsequent impact assessment has shown that the project may have a medium impact on protected character groups. Some project management tasks may be required to ensure that all protected groups are able to access information about the project.

The Action Plan has been completed to identify how information can be effectively communicated with certain protected character groups and specific mitigating actions for highlighted issues within the screening grid. The delivery

of the action plan should ensure that all members of the public are able to access information about the Thanet Parkway project.

### **Action Plan**

An action plan has been completed to identify the project management tasks which will take place to ensure equal access to information about the project and mitigating actions for specific issues highlighted above.

### **Monitoring and Review**

Throughout the delivery phase of the project the Equality Impact Assessment will be considered and updated when required. This has included following public consultation, and as the design continues to evolve.

### **Sign Off**

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

#### ***Senior Officer***

Signed: \_\_\_\_\_ Name: Joseph Ratcliffe

Job Title: Transport Strategy Manager Date: 20/11/2019

#### **DMT Member**

Signed: \_\_\_\_\_ Name: Barbara Cooper

Job Title: Corporate Director – GET Date: 20/11/2019

## Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
<b>Race</b>	A very small proportion of the residents in Thanet indicated in the 2011 Census that English was not their first language and so may not be able to read consultation information such as the publicity information.	For the public consultation of Thanet Parkway, information is made available in alternative formats, upon request.	Better understanding of the project by all members of the public.	Project Manager	Public consultation 2015,2017. COMPLETE  2019 Engagement	Resources have been allocated for the provision of information about Thanet Parkway in alternative formats.
	Safety concerns as station is unstaffed	There will be excellent CCTV and lighting coverage, the lifts will be remotely monitored and help points will be available.	Alleviation of safety concerns.	Project Manager – design Team	During project design	Included in design costs.
<b>Disability</b>	People who are visually impaired, have learning difficulties or have other print impairments such as dyslexia, may not be able to read consultation information such as the publicity information.	Consultation information is made available in alternative formats, such as Easy Read and Word version.	Better understanding of the project by all members of the public and more comfort for residents during the project lifecycle.	Project Manager	Public consultation 2015,2017 COMPLETE  2019 Engagement	Resources have been allocated for the provision of information about Thanet Parkway in alternative formats.
	During construction: dust, pollution and airborne contaminants may have an impact on people with respiratory problems	A Construction Management Plan will identify methods to reduce this risk, including working hours and mitigation	Reduction or removal of construction impacts.	Project Manager – design team/con-tractor	During design and construction	Included in design and construction costs.

		(such as damping down).				
	Safety concerns as station is unstaffed	There will be excellent CCTV and lighting coverage, the lifts will be remotely monitored and help points will be available.	Alleviation of safety concerns.	Project Manager – design Team	During project design	Included in design costs.
	Given that the station is out of town, some less abled users may not be able to access the station by car.	Provide facilities within the station design to enable alternative access to the station.	Increased opportunity for group to use the railway.	Project Manager	Outline Design COMPLETE	Accounted for in project costs.
	The subway design will mean users will access the platforms at one end.	Investigate the opportunity to have different length trains stop at different points to reduce walking distances along platforms.	Limit walking distances	Rail Project Manager	Detailed design	To be scoped in detailed design.
	East Kent Association for the blind provided useful comments on making the station more amenable to people with visual impairment.	Consider points along with best practice when designing subway refurbishment interior.	Ensure that visually impaired users are as able to use the station as possible.	Design Team	Detailed design	Allowance made in project cost.
<b>Age</b>	Older people may not be able to access information about the project via the internet.	Information will be provided in hard copy formats at public consultation events and on requests via free postal address.	Better understanding and awareness of the project for residents. People will feel more confident using the station and facilities.	Project Manager	Public consultation 2015,2017 COMPLETE  2019	Resources have been allocated for the provision of information about Thanet Parkway in the

		<p>The consultation questionnaire and promotional leaflet will be sent to every resident in Cliffsend.</p> <p>Information will be provided about the project at local libraries, Town and Parish Council offices, and railway stations in the area.</p>			Engagemen t	form of setting up free postal address, sending information to Cliffsend residents, arranging consultation events and sending information to Cliffsend residents in copy formats.
	Given the station is out of town and some people may not be able to drive or have access to a car, they could be disadvantaged (for example the elderly and young).	Provide facilities within the station design to enable alternative access to the station.	Increased opportunity for group to use the railway.	Project Manager	Outline Design COMPLETE	Accounted for in project costs.
	The subway design will mean users will access the platforms at one end.	Investigate the opportunity to have different length trains stop at different points to reduce walking distances along platforms.	Limit walking distances	Rail Project Manager	Detailed design	To be scoped in detailed design.

	Safety concerns as station is unstaffed	There will be excellent CCTV and lighting coverage, the lifts will be remotely monitored and help points will be available.	Alleviation of safety concerns.	Project Manager – design Team	During project design	Included in design costs.
<b>Gender</b>	Safety concerns, as station will be staffed. This can be supported with data from Transport for London as women feel more vulnerable when travelling after dark.	There will be excellent CCTV and lighting coverage, the lifts will be remotely monitored and help points will be available.	Alleviation of safety concerns.	Project Manager – design Team	During project design	Included in design costs.
<b>Pregnancy/ maternity</b>	The subway design will mean users will access the platforms at one end.	Investigate the opportunity to have different length trains stop at different points to reduce walking distances along platforms.	Limit walking distances	Rail Project Manager	Detailed design	To be scoped in detailed design.
<b>Carer's responsibilities</b>	Carer's may be required to provide greater levels of assistance given the station is proposed to be unmanned and may be impacted more by entrance to platforms at one end.	Investigate the opportunity to have different length trains stop at different points to reduce walking distances along platforms.  Help points will be included in the design.	Limit walking distances  Outline design station	Rail Project Manager	Detailed design  Outline design	To be scoped in detailed design.  Included in current cost