

**KENT COUNTY COUNCIL**  
**EQUALITY IMPACT ASSESSMENT**

Please read the EqIA GUIDANCE and the EqIA flow chart available on KNet.

**Directorate:**

Environment and Enterprise

**Name of policy, procedure, project or service**

The Freight Action Plan for Kent

**What is being assessed?**

Policy

N.B. This Assessment will focus on the Freight Action Plan for Kent document itself rather than detailing the impact of individual action points because these will be subject to their own Equalities Impact Assessment.

**Responsible Owner/ Senior Officer**

Andrew Westwood

Katie Pettitt

**Date of Initial Screening**

28<sup>th</sup> March 2012

Updated 5<sup>th</sup> April 2012

Updated and signed off 18<sup>th</sup> April 2012

Updated action table 11<sup>th</sup> May 2012



## 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		
<b>Age</b>	Yes		LOW	Elderly people may find it difficult to access information on the Plan, for example because elderly people are less likely to be internet-literate and therefore may have difficulty if consultation is just online. In working with local councils, young people may be less engaged and therefore not able to contribute to discussions through the consultation process.	Actions within the policy, specifically Lorry Watch, have the potential to promote equal opportunities by being made available to a variety of community groups, which may include a youth group or a group that typically features older members (such as the WI). However, these individual actions will be the subject of their own EqIA.
<b>Disability</b>	Yes		LOW	People with learning difficulties or visual impairments may find it difficult to access information on the Plan.	
<b>Gender</b>	No			N/A	
<b>Gender identity</b>	No			N/A	
<b>Race</b>	Yes		LOW	Foreign lorry drivers may find it difficult to access information on the Plan, particularly if they do not understand English. BME groups may be less involved in local councils and therefore not able to contribute to these discussions through the consultation process. Road safety leaflets targeted at foreign lorry drivers are not accessible to those who do not	Again, some of the actions within the policy may promote equal opportunities. For example, the production of road safety leaflets in foreign languages will inform those who do not speak English of road legislation and signage and therefore help to remove any disadvantage. The foreign languages have been chosen

				speaking the selected languages.	based on data for what nationalities of lorry drivers head through the Ports.
<b>Religion or belief</b>	No			N/A	
<b>Sexual orientation</b>	No			N/A	
<b>Pregnancy and maternity</b>	No			N/A	
<b>Marriage and Civil Partnerships</b>	No			N/A	

## **Part 1: INITIAL SCREENING**

### **Context**

The Freight Action Plan for Kent sits within the suite of transport policies comprised of the third Local Transport Plan for Kent (March 2011), Growth without Gridlock (December 2010) and the Rail Action Plan for Kent (April 2011). The Delivering a Sustainable Transport System: London to Dover/Channel Tunnel Study was commissioned by KCC in 2009. It found that the sustainable, efficient and expeditious movement of international freight via the strategic road network needs to be safeguarded and also that Kent's gateway function has a detrimental impact on residents. This is backed up by the frequent complaints and enquiries related to road haulage, for example requests for weight limits.

Growth without Gridlock dealt with the large strategic schemes to address these challenges, such as a third Thames crossing. The Freight Action Plan sets out the smaller scale interventions that KCC, working with communities and partner organisations, can make to mitigate the impact of road haulage on our communities and environment.

### **Aims and Objectives**

The Freight Action Plan aims to mitigate the impact of road haulage on Kent. It is divided into six objectives:

- Objective 1: To find a long-term solution to Operation Stack.
- Objective 2: To take appropriate steps to tackle the problem of overnight lorry parking in Kent.
- Objective 3: To effectively manage the routing of HGV traffic to ensure that such movements remain on the strategic road network for as much of their journey as possible.
- Objective 4: To take steps to address problems caused by freight traffic to communities.
- Objective 5: To ensure that KCC continues to make effective use of planning and development control powers to reduce the impact of freight traffic.
- Objective 6: To encourage sustainable freight distribution.

The objectives will be achieved by completing the individual action points assigned to them, e.g. to adapt the Lorry Watch scheme to Kent, to set up a Kent lorry journey planner on the [kent.gov.uk](http://kent.gov.uk) website, and to progress the plans for an Operation Stack Lorry Park.

### **Beneficiaries**

All residents, workers and visitors in Kent, including commercial vehicle drivers who will benefit from clearer routing and signing.

### **Consultation and data**

The equality and diversity profiles for Kent (March 2012) have been used, and Akua Agyepong (Corporate Lead on Equality and Diversity) and Clive Lever (Equality and Diversity Officer) consulted on the process.

The equality and diversity profiles show that:

- Kent has an aging population, with 18.1% of the population being 65 years or older
- Life expectancy information shows that West Kent is higher for both males and females, suggesting that the population will be older in the west of the county
- The highest proportion of people with a limiting long-term illness (LLTI – a measure of disability) live in East Kent and the coastal areas
- A greater proportion of females than males have an LLTI and that a greater proportion of both males and females with an LLTI are aged over 65
- BME groups are distributed across Kent but with particular concentrations in Canterbury, Gravesham and Dartford, with Indians making up the biggest minority group

Further, from knowledge of the industry, foreign lorry drivers making the crossing into Kent from Europe tend to be of Eastern European (particularly Polish and Czech), Spanish and French origin.

The FAP has been consulted on internally within Highways to ensure that the content is complete in terms of the relevant work currently underway and planned within individual teams. This also collected comments on the action points and wording to form the final draft document.

The FAP has also appeared on the agenda of several Joint Transportation Boards as an information item (i.e. the full document was not presented) and has been well received by Councillors.

The list of proposed consultees can be found in the accompanying spreadsheet, including industry bodies, Districts and Boroughs, and those that have been identified as a result of this EqIA (groups representing a range of ages, disabilities and races).

### **Potential Impact**

The initial screening has indicated that the Freight Action Plan may impact on three groups – age, disability and race.

Actions within the plan will have their own implications from an EqIA perspective and as such will have their own assessment carried out to ensure that no protected characteristics are adversely impacted.

### **Adverse Impact:**

Affecting all three identified groups is the ease of access to information on the Plan.

People who do not understand English may be adversely impacted because they may not be able to access the Plan. Similarly, elderly people are less likely to be computer literate and therefore may not have access to online consultation if this is singularly used.

In addition, those with visual impairments may not be able to access the consultation if the website does not take into account the use of text-to-speech software and if alternative formats are not available.

It is possible that young people and BME groups are less involved in local government, including Parish and District/Borough Councils that the Plan will be consulted through.

**Positive Impact:**

Overall reduced impact from road haulage in Kent, including empowered and informed citizens, fewer incidents of lorries using inappropriate routes, better satellite navigation routing and reduced pressure on the local road network from freight movements.

In terms of positive impacts on groups with protected characteristics, it is possible that some of the actions within the plan will promote equal opportunities (as detailed in the screening table). However, as discussed, these actions will have their own EqIA.

**JUDGEMENT**

**Option 2 – Internal Action Required                      YES**

There is potential for adverse impact on particular groups and we have found scope to improve the proposal. Please see the completed Action Plan.

**Equality and Diversity Team Comments**

*The Equality and Diversity Team to make any comments following their review.*

**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:

Job Title:

Date:

**DMT Member**

Signed:

Name:

Job Title:

Date:



## Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
<b>Age</b>	Elderly people may find it difficult to access information on the plan.	Publicity will be issued promoting the consultation using multiple channels as per the advice of the Consultation Team. The document will also be available in other formats and this will be clearly stated both within the FAP and on the consultation webpage. Rather than using hard copies, representative groups will be contacted and asked to respond or distribute the document to their members.	The strategy is fully accessible to all.	KP/AW	Consultation period.	Money should be allocated to provide alternative formats and to print hard copies.
<b>Age</b>	Young people may be less engaged with local government and therefore find it difficult to	Publicity will be issued promoting the consultation using multiple channels as per the advice of the Consultation Team. The document will also be	The strategy is fully accessible to all.	KP/AW	Consultation period.	As above.

	access information on the plan.	available in other formats.				
<b>Disability</b>	People with learning difficulties may find it difficult to access information on the plan.	Publicity will be issued promoting the consultation using multiple channels as per the advice of the Consultation Team. The document will also be available in other formats, including EasyRead. The document will be sent to groups representative of a number of disabilities, such as the Kent Association for the Blind (KAP) and Avante Partnership.	The strategy is fully accessible to all.	KP/AW	Consultation period.	As above.
<b>Disability</b>	People with visual impairments may find it difficult to access information on the plan.	As above. Consideration will be given for text-to-speech software and a MS Word copy will be made available online with graphics removed for this purpose.	The strategy is fully accessible and usable to all.	KP/AW	Consultation period.	As above.
<b>Race</b>	People who do not read English may find it difficult to access	Publicity will be issued promoting the consultation using multiple channels as per the advice of the	The strategy is fully accessible and usable to all.	KP/AW	Consultation period.	As above.

	information on the plan.	Consultation Team. The document will also be available in other formats. The document will be sent to specific groups, such as the Kent Equality Cohesion Partnership.				
<b>Race</b>	BME groups may be less involved in local government and therefore find it difficult to access information on the plan.	As above.	The strategy is fully accessible to all.	KP/AW	Consultation period.	As above.