

EQUALITY IMPACT SCREENING AND ASSESSMENT			
Name of Practice/Policy	M2 Junction 5 Improvements	Proposed or Current	Proposed
Person Completing the Assessment		Originated: Rebecca McClenaghan Reviewed: Bryn Jones	
Directorate		Major Projects	
Date	December 2018; Updated February 2019; Updated March 2020; Updated May 2020	Reference No	MPS41
<p><b>A: The aims, purpose, desired benefits and expected outcomes of the practice/policy, identifying the customers, staff or stakeholders involved or affected.</b></p> <p><b><u>Scheme Background</u></b></p> <p>The M2 Junction 5/A249 Stockbury Roundabout is located within Kent and is an important corridor linking Dover with London. The M2 Junction 5/A249 Stockbury Roundabout improvement scheme forms part of the Highways England £15 billion investment on major roads and motorways and Highways England's Delivery Plan 2015-2025. The scheme is in Highways England's PCF Stage 5 - Construction Preparation (Detailed Design). The M2 Junction 5/A249 Stockbury Roundabout scheme was identified for improvements as it is unable to cope with existing traffic flows. There has been notable congestion and delay on the A249 southbound and northbound and on the exit slip road from the M2 westbound. Road users have been using alternative rural routes to avoid congestion, increasing local safety risks.</p> <p>The Public Local Inquiry is scheduled to commence on 28<sup>th</sup> August 2020 and continue until 14<sup>th</sup> September 2020. The Secretary of State (SOS) decision is anticipated by 19<sup>th</sup> February 2021, followed by the final stage gate assessment review (SGAR5) on 25<sup>th</sup> February 2021.</p> <p>The scheme will aim to reduce congestion in the area, improving journeys for those travelling north east to Sittingbourne, the Isle of Sheppey and the Port of Sheerness. Journeys south west to Maidstone and surrounding villages will also be improved by the scheme. Option 4H1, the preferred route, has been selected which delivers the Roads Investment Strategy outcomes, highest safety outcomes and does not require traffic signals on the A249.</p> <p>The main elements of the new junction are as follows:</p> <ul style="list-style-type: none"> <li>• <u>Road and vehicle access changes:</u> <ul style="list-style-type: none"> <li>○ <b>New A249 flyover</b> - a flyover will be established over the existing Stockbury Roundabout to improve traffic flows. The existing route will be realigned to accommodate the flyover.</li> <li>○ <b>Closure of Maidstone Road connection to A429</b> - existing connection from Maidstone Road to the Stockbury Roundabout will</li> </ul> </li> </ul>			

be closed, and re-routed to link with Oad Street. Oad Street will connect directly to the A249 Stockbury Roundabout.

- **New speed limit** – traffic leaving Stockbury Roundabout onto Oad Street westbound (from Applegate Farm) is proposed to have a 30mph speed limit (previously 60mph).
- **Honeycrook Hill access** - Honeycrook Hill junction with the A249 will be closed over safety concerns.
- **Properties** – existing A249 southbound carriageway will have no connection with the A249 but will be retained for access to properties.
- Slip roads and realignments
  - **2 new free-flowing slip roads, as follows:**
    - Left turn for traffic travelling from the A249 southbound to the M2 westbound and A249 northbound to the M2 eastbound.
  - **M2 slip road realignment** - M2 slip roads will be realigned to be single lane, free-flowing routes for left-turning traffic to the M2 westbound.
  - **Church Hill** – proposed merging lane for traffic joining the A249 northbound from Church Hill, and improved diverge lane joining Church Hill from the A249 northbound.
- Footpaths
  - **New Public Right of Way (PRoW) north west of Stockbury Roundabout**– new PRoW north west of Stockbury Roundabout running parallel to the A249 will be set back from its original position. This will connect to existing PRoW ZR71 which runs parallel to the A249 northbound towards Danaway.



- Improve crossing facilities for pedestrians, cyclists and horse riders and incorporate safe, convenient accessible and attractive routes;
- Minimise impacts on surrounding local road network;
- Support projected population and economic growth in the area;
- Avoid, reduce, mitigate and/or compensate for any significant adverse effects or substantial harm through good design;
- Improve the quality of life for local residents by mitigating any significant noise effects and supporting targets on air quality; and
- Seek good design, balancing functionality with achieving positive environmental outcomes.

### **Customers, Staff and Stakeholders**

The customers, staff and stakeholders involved or affected by the scheme include:

- **Customers** – Road users along the route, as well as all road users on local roads experiencing impacts as a result of the scheme – both during construction and operation (i.e. where traffic is redistributed from/across local roads). Impacts arising on local roads, and to public transport and NMU routes may also affect residents, pedestrians and cyclists and access to local community facilities;
- **Staff** – Staff involved in construction and management of the scheme. For comparison purposes, a similar size scheme (recently completed M1 J19 Improvement (£191m)), employed over 2000 staff throughout its 3-year duration, and at the peak point during the project around 500 to 600 operatives would have been working on the project, supported by up to 200 staff and enabling function roles. This presents a considerable employment opportunity in the area, and can be used to maximise the social value of the project;
- **Stakeholders** – Includes local authorities, public services, groups with land impacted by the scheme, and local community facilities impacted by the scheme, which are discussed further into this document. Specific examples of amenities relevant to this EqlA who may be considered stakeholders are discussed in section C. These amenities will be included in the communication and engagement plan for the project (either through direct engagement, or by providing information on the communication and engagement approach).

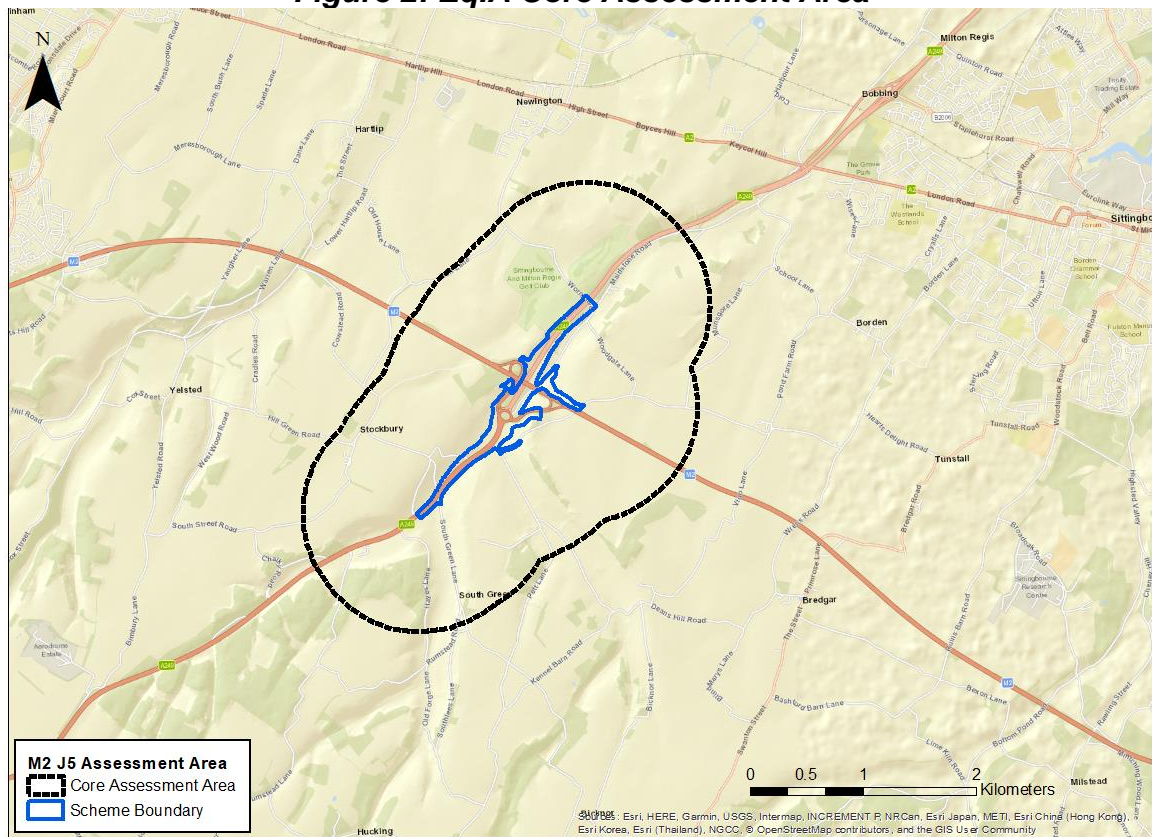
Considering the above customers, staff and stakeholders, this EqlA focuses specifically on the protected characteristic groups (PCGs) outlined in the Equality Act (2010) which will each be represented by the above groups, namely – age, sex, disability, ethnicity, religion, marriage and civil partnerships, sexual orientation and pregnancy and maternity. The EqlA seeks to identify any disproportionate impacts likely for these PCGs as a result of the scheme and present mitigation and monitoring actions to reduce this disproportionate impact.

### **Assessment Area**

This EqlA will focus on a core scheme assessment area, as this is where the majority of impacts will be experienced by road users and local communities who may be affected by additional traffic, construction impacts and environmental impacts. A 1km buffer of the scheme is considered as the core assessment area

for the EqIA, as shown in Figure 2. Although this will be used as a core assessment area, the assessment will not be limited, and any wider impacts will be considered.

**Figure 2: EqIA Core Assessment Area**



**B: SCREENING:**

**Questions considered to establish impacts from the outset for new or changing policies/practices**

	<b>Gender (incl Pregnancy &amp; maternity)</b>	<b>Religion &amp; Belief</b>	<b>Age</b>	<b>Disability</b>	<b>Ethnicity &amp; Race</b>	<b>Sexual Orientation (incl marriage &amp; civil partnerships)</b>	<b>Transgender</b>
1: Is there any indication or evidence that different groups have different needs, experiences, issues or priorities in relation to the practice/policy?	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>N</b>	<b>N</b>
2: Is there evidence or an indication of higher or lower uptake by different groups?	<b>N</b>	<b>N</b>	<b>Y</b>	<b>Y</b>	<b>N</b>	<b>N</b>	<b>N</b>
3: Do people have different levels of access? Are there social or physical	<b>Y</b>	<b>N</b>	<b>Y</b>	<b>Y</b>	<b>Y</b>	<b>N</b>	<b>N</b>



barriers to participation (e.g. language, format, physical access)?							
4: Is there an opportunity to advance equality or foster good relations by altering the policy/practice?	Y	Y	Y	Y	Y	N	N
5: Is there an opportunity to advance equality or foster good relations by working or engaging with other organisations or the wider community?	Y	Y	Y	Y	Y	N	N
6: Is there stakeholder (staff, Trade Unions or public) concern about the policy/practice in terms of actual, perceived or potential discrimination against a particular group?	N	N	N	N	N	N	N
7: Is there potential for, or evidence that, any part of this policy/practice may adversely affect equality of opportunity for all or may harm good relations between different groups?	N	N	N	N	N	N	N
8: Is there any potential for, or evidence that any part of the policy/practice could discriminate indirectly or directly? (Consider those who implement it on a daily basis).	Y	Y	Y	Y	Y	N	N

**C: The rationale behind the rating (at section B), and details of the evidence utilised to inform the screening decision.**

(If all answers are 'no' an EqlA is not required, but the reasons and monitoring requirements are summarised. If the answers are 'yes' or not known' the judgement on the need to gather further evidence to reach an informed decision via an EqlA is explained. If there is confidence that the effect of the policy/practice will not be different for different groups then this is summarised below).

A series of information has been drawn together to inform the screening and ongoing EqlA. This includes:

- The scheme background;
- Socio-demographic profiling;
- Area background (crime levels and community facilities relevant to the EqlA); and
- Consultation.

The findings from this data gathering that are relevant to this EqlA are presented below, and key considerations for the EqlA summarised at the end of this section.

## Scheme considerations

### ***The Scheme - Key considerations for the EqIA:***

- *Changes to access along the route and to local amenity will require clear information strategies and accessible routes;*
- *Changes to public transport stops need to be considered due to proposed increased walk distances to local amenities;*
- *Changes to access and usual travel routes as a result of construction – particularly for those with specific travel requirements;*
- *Environmental impacts associated with construction (noise, air quality, overall environmental impacts) on neighbouring residences and amenities;*
- *Creation of temporary employment during construction;*

Elements of the scheme which are likely to relate to the PCGs considered within this assessment include:

- **Changes to NMU routes** around the junction – maintaining access along NMU routes (outside of required closures during construction), and providing benefits to those who travel on foot/cycle and horse riders, assuming they are fully accessible for all PCGs and meet all Inclusive Design requirements; This will be especially critical for those with specific accessibility requirements such as those with limited mobility, wheelchair users, parents with pushchairs, those with sight impairments and the elderly;
- **The closure of side access routes** to the A249 may result in longer journeys to access facilities. For example, the access to Maidstone Road from the A249 will be closed and re-routed to link with Oad Street. This will increase journey times and also impact on properties located along Oad Street through increased traffic along the route;
- The scheme will also **relocate bus stops** located on the A249 between the Church Hill junction and Stockbury Roundabout. **The location of these buses will be moved north-east of the Church Hill exit on the A249 and the proposed road linking Oad Street to the Stockbury Roundabout.** The needs of PCGs will need to be considered – specifically unconfident travellers, or those with mobility impairments, disabilities, or those who are pregnant or travelling with small children who may not be able to travel increased distances to access public transport services;
- **Construction of the scheme** is predicted to last approximately 23 months. This will result in impacts on drivers, local communities and those accessing facilities surrounding the scheme. Impacts of construction that may be relevant to the PCGs included within this assessment relate to temporary arrangements/access diversions along the route as well as impact on access to key facilities, environmental impacts such as construction noise and air quality impacts, and an overall worsening of the environment in surrounding recreational spaces. This will particularly impact parents and school children accessing schools, those of a working age who must travel past the scheme as part of their commute and elderly reaching community facilities;

- The construction of the scheme will provide **temporary employment**, which could provide benefit to local communities, the unemployed and those from minority backgrounds if a comprehensive and inclusive recruitment strategy is adopted. On similar schemes this was in the order of around 2000 staff for construction which, assuming an inclusive recruitment approach is adopted presents a good opportunity to maximise benefits for those seeking employment locally; and
- **Reduction in congestion** around the M2 junction 5 and Stockbury roundabout and subsequent reduction in congestion on the M2 and A249, specifically at peak times. This will likely result in increased speeds along the route, which may increase noise levels, but reduce carbon emissions. A simplified junction may also provide benefits for unconfident drivers (potentially younger or older people).
- **Access to information on the scheme** in advance of construction. This will provide a forum for local users and residents to communicate with those progressing the scheme to minimise impacts on communities. A Public Local Inquiry into the Orders for the scheme is to be held in August 2020 the outcome of which may affect the design of the scheme.

The screening note is supported by the outputs from the [EDIT SHARE LINK \(updated March 2020\)](#). Overall, the EDIT score is 50%, and the assessment identified that the scheme is located close to a number of equality hotspot areas and generally falls within an area with several equality considerations (score 3/medium). It also identified key areas for consideration including the NMU impacts; access to community facilities, noise, dust, light and environmental impacts; and user experience and confidence impacts.

#### Air Quality Impacts

During construction, the effect on local air quality arising from dust and particulate matter emissions will be minimised through the adoption of appropriate mitigation measures. These include regular water-spraying and sweeping of unpaved and paved roads; using wheel washes; speed limits for vehicles on unmade surfaces; damping down of surfaces prior to their being worked; and storing dusty materials away from site boundaries in appropriate containment. With these measures in place, slight adverse effects are predicted on PCGs<sup>1</sup>. During operation, no receptors are predicted to exceed the annual mean NO<sub>2</sub> concentrations, therefore the overall effect is not expected to be significant for any PCGs.

#### Noise Impacts

During construction, noise effects will be experienced by nearby receptors (Threeways, Vale Cottages, The Studios, Whipstakes Farm and Sandina) and any PCGs travelling through the area. Temporary noise barriers adjacent to the works will almost eliminate any predicted significant daytime construction activities. Several controls can be put in place to manage noise from any night-time works. The Construction Environmental Management Plan will contain these controls, which will be approved by the Local Authority and implemented by the Contractor. With these mitigation measures in place, no significant construction noise effects are predicted. Once the scheme is in operation, no significant adverse noise effects are predicted. Significant benefits are predicted to occur at

<sup>1</sup> Highways England (2019) M2 Junction 5 Improvements Environmental Statement



two 'Important Areas' for noise and properties associated with Stockbury Valley. This is due to the change in the road alignment which moves the traffic away from these locations and also due to the use of low noise road surfacing. No PCGs would therefore be significantly impacted by the scheme and some may benefit as result of less traffic noise.

**Please note:** This scheme information is based on the design at the time of completing this report. If there are design changes, the EqlA will be reviewed and updated accordingly.

### **Socio-Demographic Profiling**

#### ***Socio-demographic Profiling - Key considerations for the EqlA:***

*Core assessment area population generally in line with local averages, though the area as a whole has some clear concentrations of PCGs;*

- *Higher proportion of White ethnicities in the core assessment area compared to local and national averages, and lower proportions of BME residents;*
- *Higher proportion of Christianity in core assessment area compared to local and national averages, and a lower proportion of Muslims, Hindus, Jews, Buddhists, Sikhs and Other religions/beliefs;*
- *Lower proportion of people claiming disability living allowance and with Limiting Long Term Illness in core assessment area compared to local and national averages; and*
- *Higher proportion of married couples in the core assessment area compared to local and national averages.*

This section seeks to identify the representation of PCGs relevant for this EqlA within the core assessment area, namely - age, sex, disability, ethnicity, religion, marriage and civil partnerships, pregnancy and maternity and sexual orientation.

Census 2011 data has been used to obtain statistics on these groups. Figures for the core assessment area include data from Output Areas (OAs) and Lower Super Output Areas (LSOAs) (wholly or partially) within the core assessment area for this assessment (1km boundary of the scheme). These are then compared to the local area (local authorities: Maidstone, Medway and Swale combined), and national statistics.

It should be noted that there is limited data available on gender reassignment, and consequently the data is not available at a scheme or local level. Therefore, this data is not presented here, however these groups will be considered fully within the assessment.

**Age**

Group	Core assessment area	Local Area	England
Children (People Aged Under 16)	17.3%	19.7%	18.8%
Younger People (Aged 16-24)	9.1%	11.4%	11.9%
Working age (Aged 16-64)	62.1%	64.3%	61.1%
Older People (Aged 70+)	7.5%	7.3%	11.7%

The proportion of older people in the core assessment area is in line with that of the local area, however is slightly lower than the national average. The proportion of children is lower in the core assessment area than the local area or national average. Children can be adversely affected by construction air pollution and noise, which can impact on their cognitive ability. Unconfident travellers such as children and older people may also be specifically impacted by changes to their usual travel routes and require clear information to enable them to plan their journeys effectively. This is particularly true for NMU routes as diversions with extra distances may adversely affect older people accessing local facilities.

The geographic distribution of the highest concentrations of children, younger people and older people are outlined in Figure 3, Figure 4 and Figure 5. Despite the lower proportion of children in the core assessment area compared to the local area and national average, there are still clear concentrations in the assessment area.

**Figure 3 – Concentrations of children (under 16s) – Census 2011**

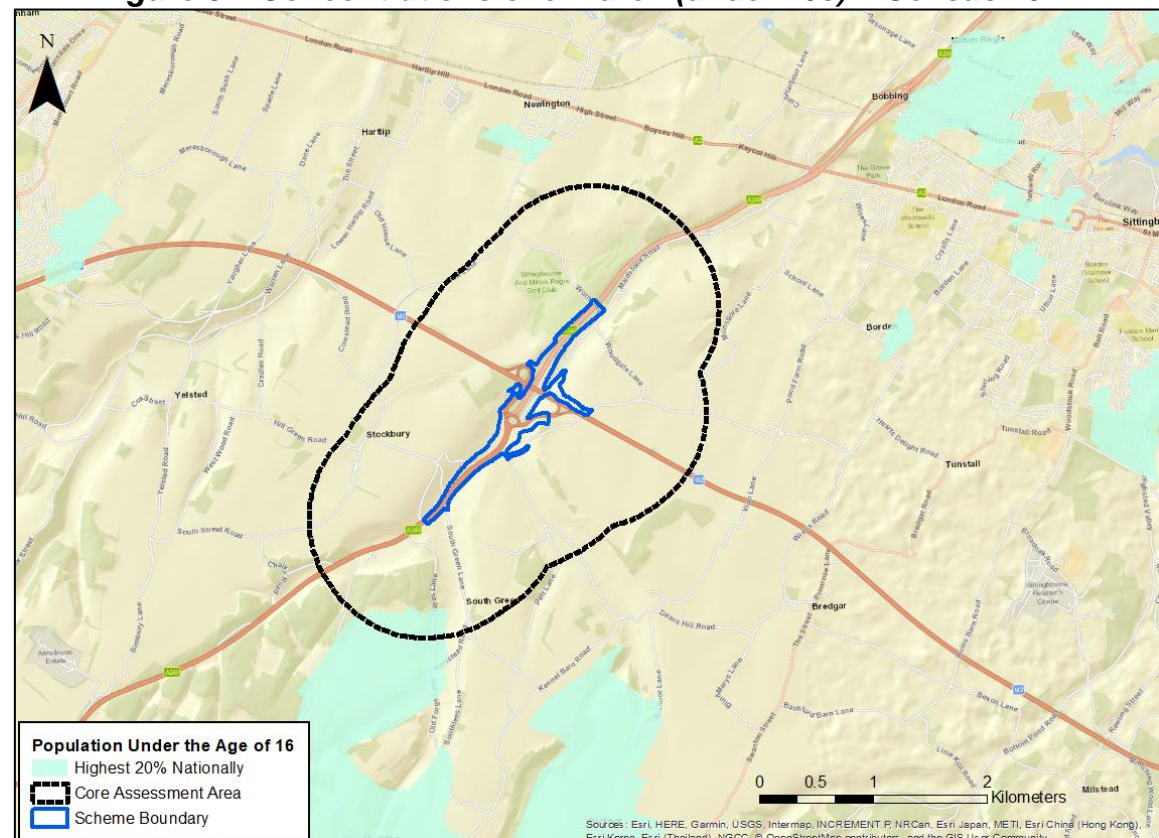


Figure 4 illustrates that within the core assessment area there are no areas of younger people in the highest 20% nationally.

**Figure 4 – Concentrations of younger people (Aged 16 to 24) – Census 2011**

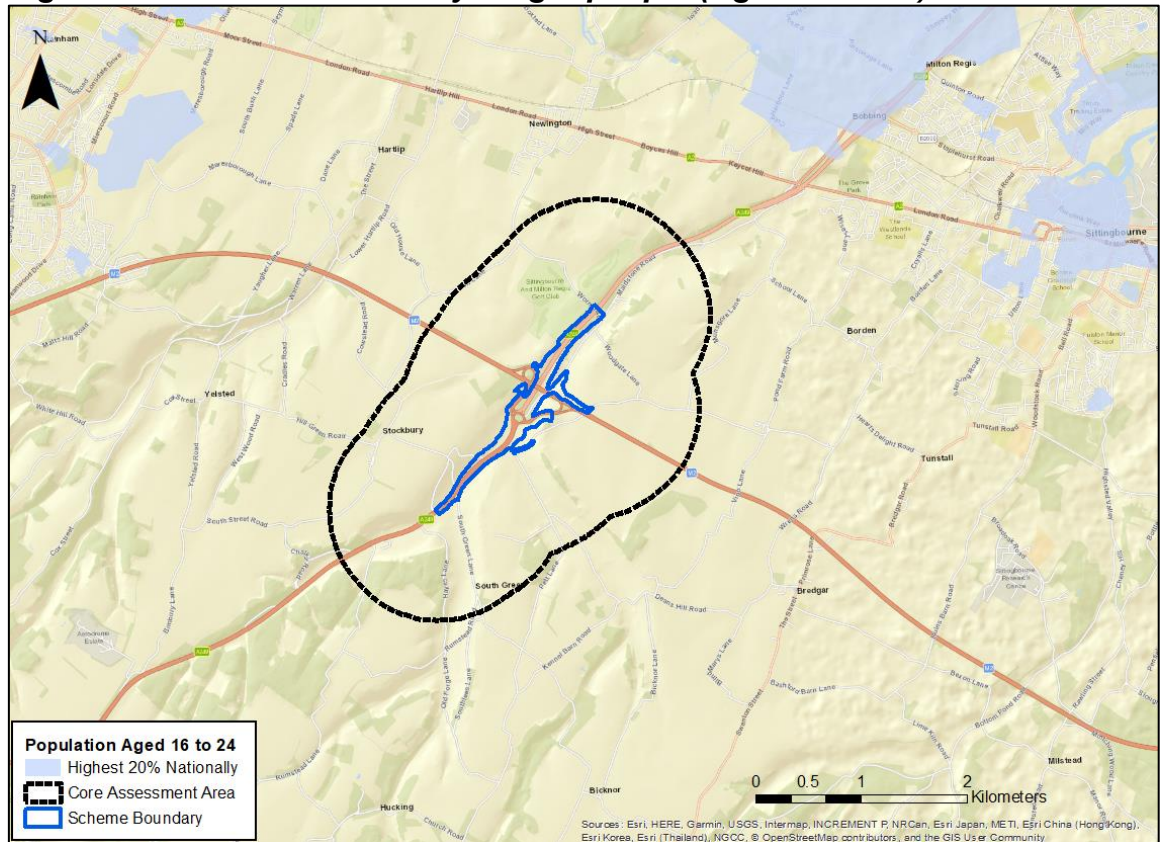
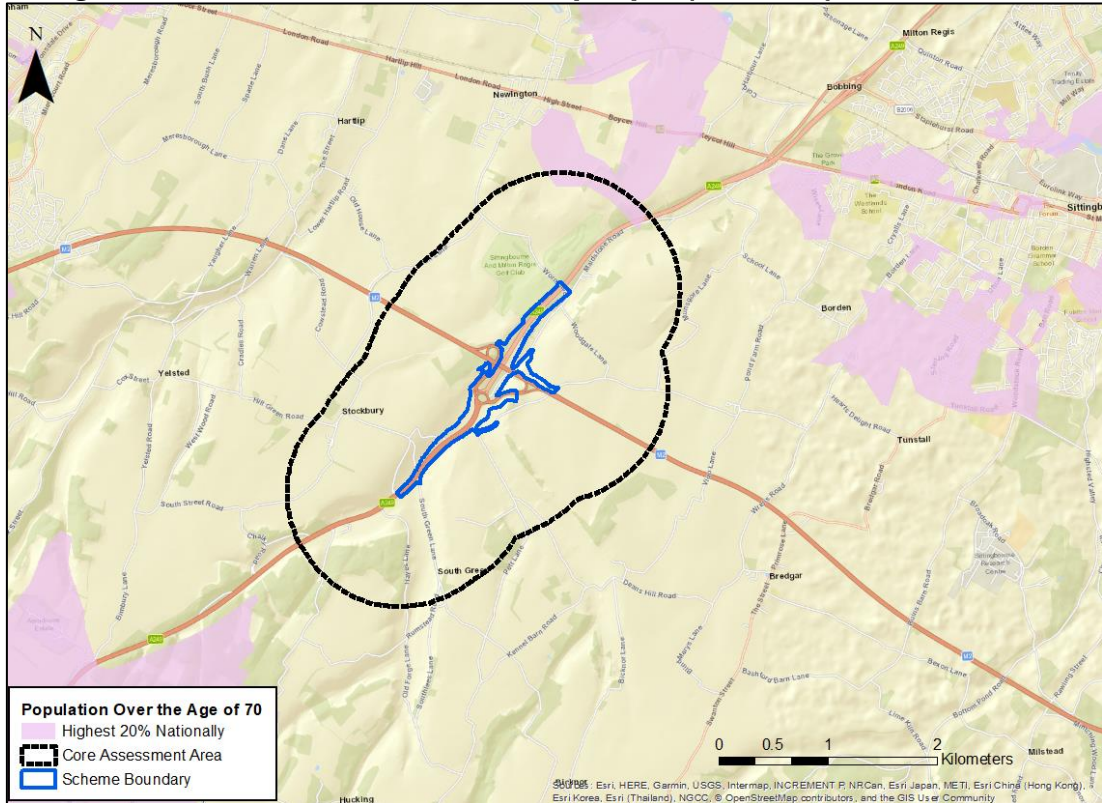




Figure 5 illustrates there is only a small area to the north of the core assessment area with a higher proportion of older people, placing them in the highest 20% nationally.

**Figure 5 – Concentrations of older people (over 70s) – Census 2011**



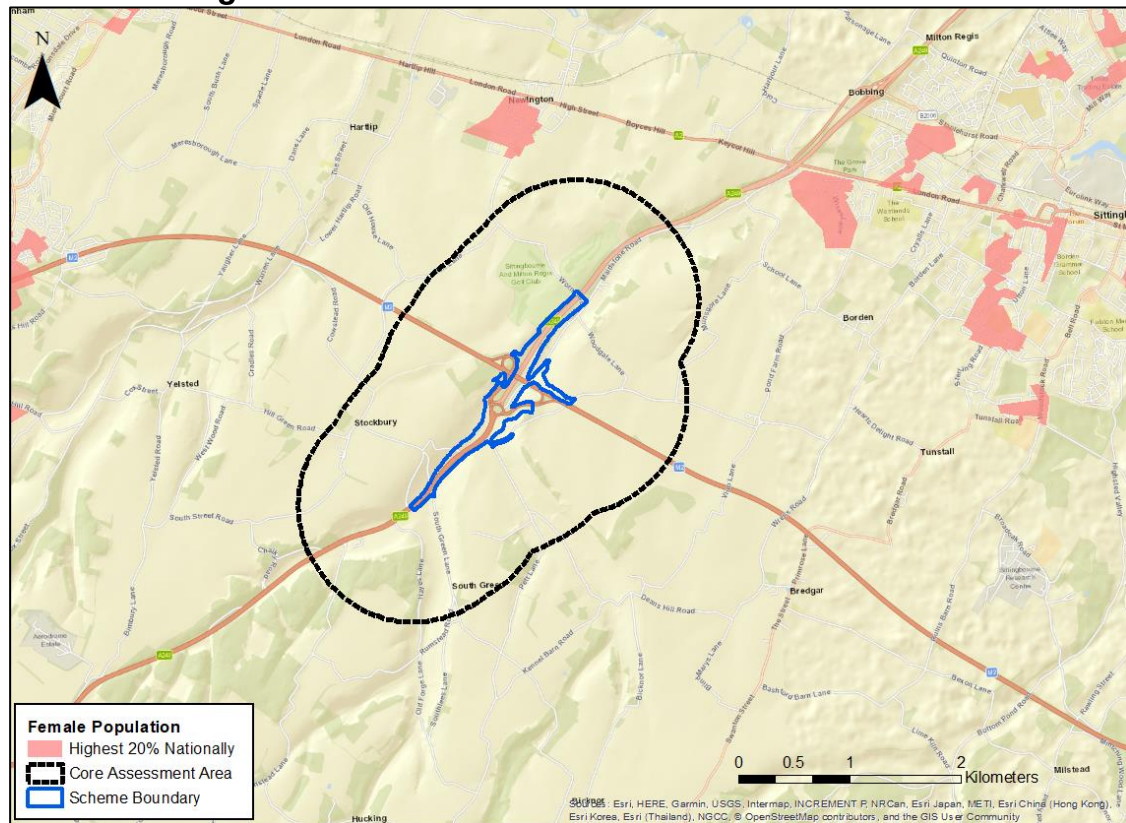
## Sex

Sex	Core assessment area	Local Area	England
Females	49.6%	50.7%	50.8%
Males	50.4%	49.3%	49.2%

The proportion of females within the core assessment area is slightly lower than the regional and national averages. Figure 6 illustrates there are no clear geographic concentrations of females (highest 20% nationally) within the core assessment area.

Sex of individual is examined in the EqIA due to the potentially different barriers faced by males and females when travelling, and potentially different access levels to facilities and services.

**Figure 6 – Concentrations of females – Census 2011**





**Disability**

Disability	Core assessment area	Local Area	England
Disability living allowance claimants	6.0%	7.1%	6.5%
Limiting Long Term Illness (activities limited a little or a lot)	16.8%	17.2%	17.6%

The proportion of the population claiming disability living allowance in the core assessment area is lower than the national average. The proportion of the core assessment area population with a Limiting Long-Term Illness was in line with the local area and national average. Those with disabilities can face a number of barriers relating to travel, including specific travel requirements, limited mobility – specifically related to NMU routes, walking distances or access to public transport, and the requirement for clear information for those with learning disabilities or cognitive impairments.

Figure 7 displays the concentrations of those living with Disability Living Allowance Claimants (highest 20% nationally), showing there are no clear geographic concentrations of this group in the assessment area.

**Figure 7 – Concentrations of DLA Claimants**

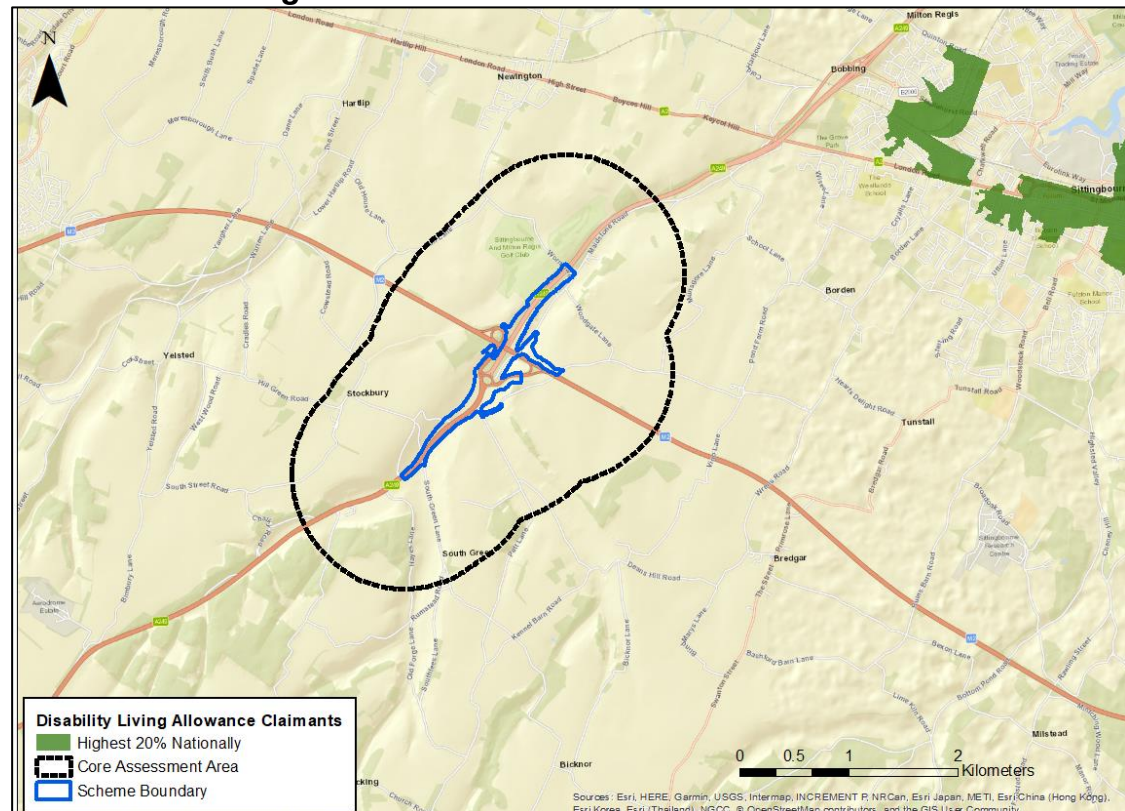
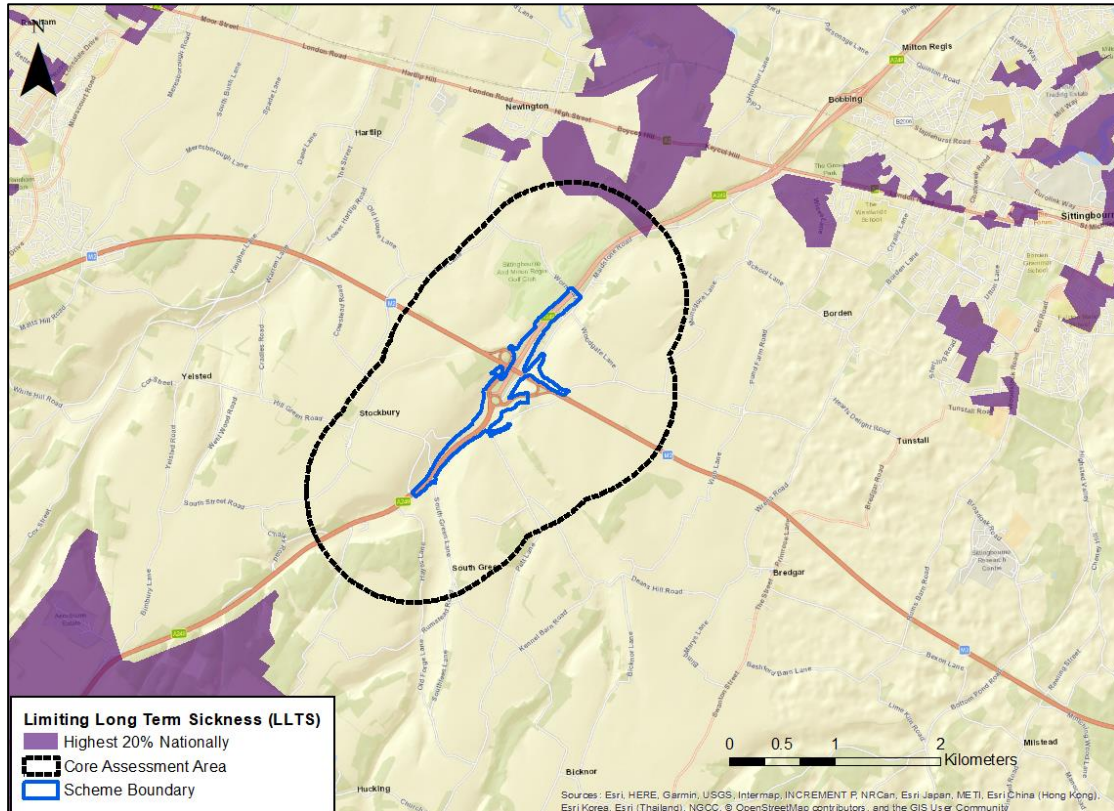


Figure 8 illustrates a small area to the north of the core assessment area with concentrations of those with Limiting Long Term Sickness in the highest 20% nationally.

**Figure 8 – Concentrations of those with Limiting Long Term Sickness – Census 2011**



### Ethnicity

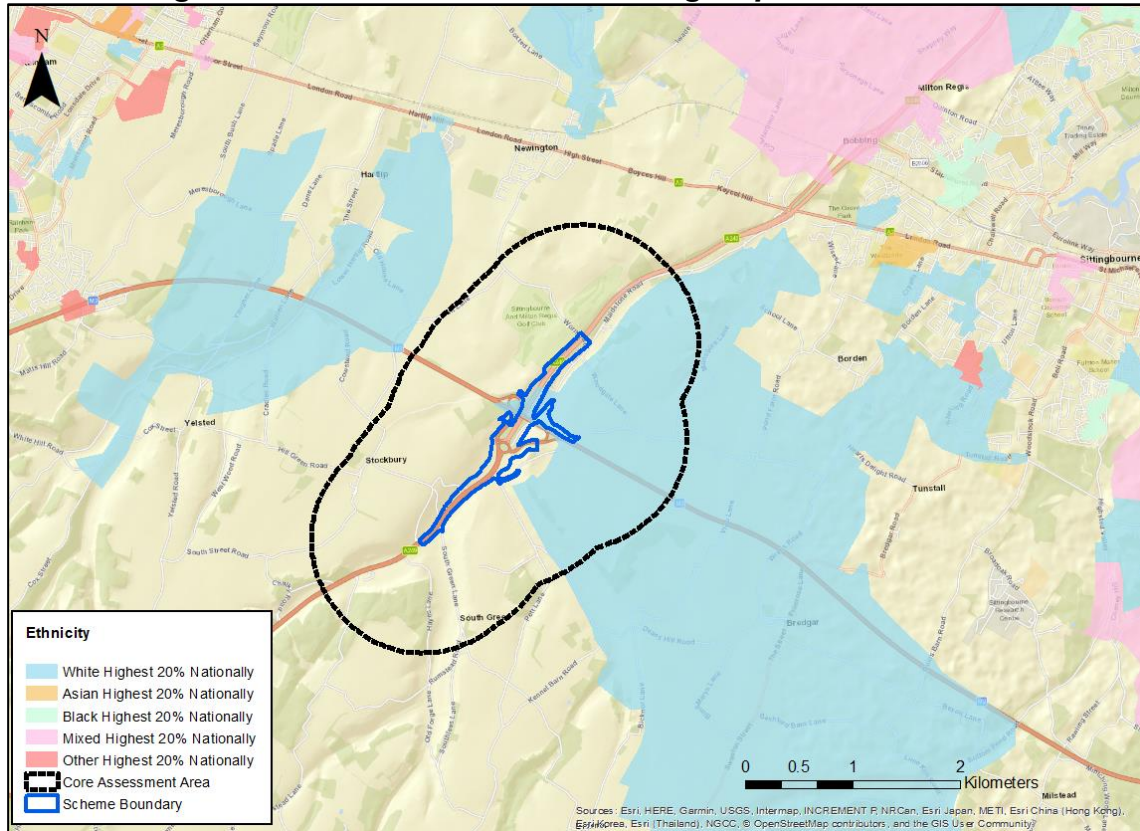
Ethnicity	Core assessment area	Local Area	England
White	97.7%	92.9%	85.4%
Mixed/multiple ethnic groups	1.0%	1.6%	2.3%
Asian/Asian British	0.6%	3.4%	7.8%
Black/African/Caribbean	0.6%	1.6%	3.5%
Other Ethnic Group	0.1%	0.5%	1.0%
Black and Minority Ethnic Groups (BME) Total	2.3%	7.1%	14.6%

The majority (98%) of the core assessment area are White, which is higher than the local area and national average. All Black and Minority Ethnic (BME) Groups proportions in the core assessment area are lower than the local area and England average.



Figure 9 illustrates a large area in the centre and east of the core assessment area with concentrations of White ethnicities (i.e. those in the highest 20% areas nationally for white residents). There are no areas of BME groups within the core assessment area in the highest 20% nationally.

**Figure 9 - Concentrations of ethnic groups – Census 2011**



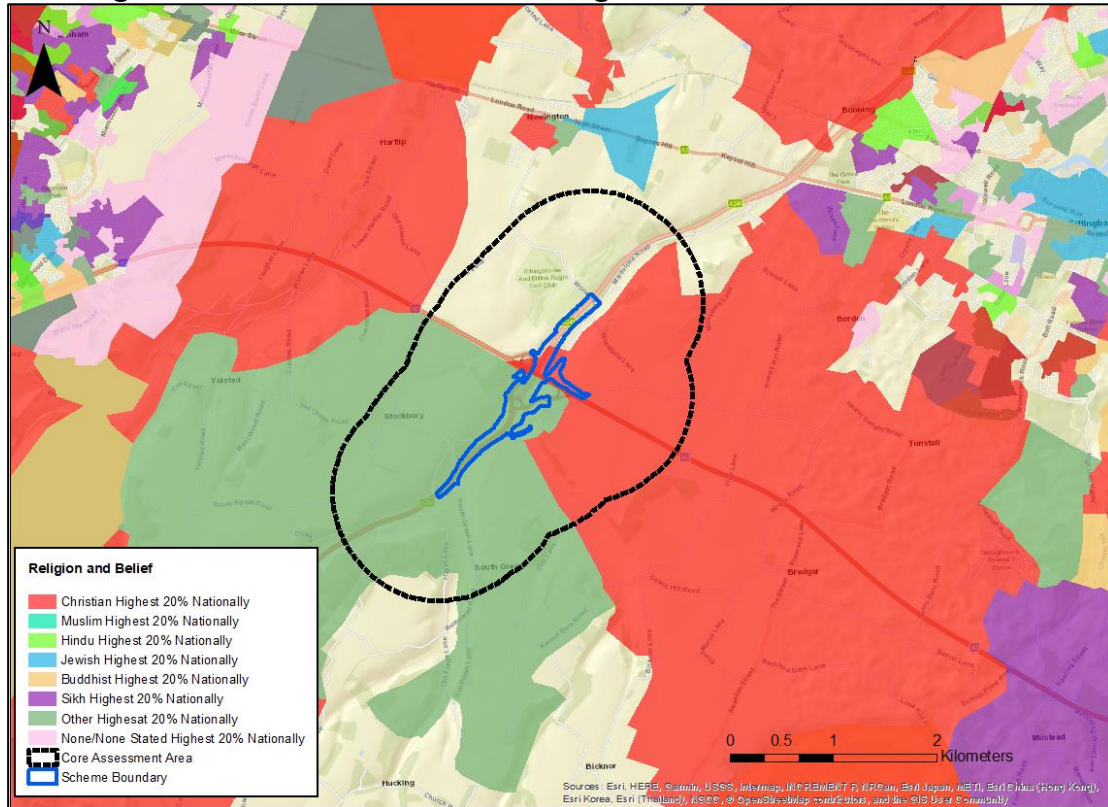
**Religion / Belief**

Religion	Core assessment area	Local Area	England
Christian	68.1%	60.7%	59.4%
Muslim	0.2%	1.3%	5.0%
Hindu	0.3%	0.8%	1.5%
Jewish	0.0%	0.1%	0.5%
Buddhist	0.1%	0.4%	0.5%
Sikh	0.1%	0.7%	0.8%
Other	0.3%	0.4%	0.4%
None/ Not stated	31.0%	35.6%	31.9%

The most prevalent religion in the core assessment area is Christianity, which is higher than the local and national averages. The proportion of Muslims, Hindus, Jews, Buddhists, Sikhs and other religions/beliefs in the core assessment area were all lower than both the local area and England.

Figure 10 illustrates an area to the east of the core assessment area with concentrations of Christians in the highest 20% nationally. To the south west of the core assessment area there is a large area of other religions/beliefs within the highest 20% nationally.

**Figure 10 – Concentrations of religions and beliefs – Census 2011**



***Marriage and Civil Partnerships***

Status	Core assessment area	Local Area	England
Civil partnership	0.2%	0.1%	0.2%
Divorced	5.4%	7.8%	7.3%
Married couple	50.0%	38.6%	37.8%
Separated	2.0%	2.4%	2.2%
Single	19.3%	25.9%	28.1%
Widow	5.7%	5.5%	5.6%

The profile of marriage and civil partnerships in the core assessment area mirrors that in the local area and England for those in civil partnerships, separated and widowed. The proportion of divorced and single people is slightly less than the local and national average. The proportion of married couples is larger than the local and national average.

***Pregnancy and Maternity***

The pregnancy and maternity group need to be considered within an EqIA for a number of reasons including employment practices, any temporary disability whilst pregnant, specific travel requirements (i.e. travelling whilst pregnant or with

children and prams), or access to medical and childcare facilities. In addition, time spent at home during the working day whilst undertaking caring duties can result in disproportionate impacts of a scheme, for example noise and vibration impacts of construction.

Data on pregnancy rates are not widely available, and therefore a good approximation to this is the number of live births within the area. The examination of fertility rates also provides an indicator as to the presence of pregnancy and maternity groups within the area. Both of these data sources are currently available annually at local authority and national level.

The General Fertility Rate and Total Fertility Rate in the local area is higher than in Kent and England. However, the number of live births in the local area is lower than that of the whole of Kent.

Measure	Local Area	Kent	England
Live births (2016)	2,502	17,374	663,157
General Fertility Rate (GFR) <sup>2</sup>	67.9	62.5	62.5
Total Fertility Rate (TFR) <sup>3</sup>	2.00	1.90	1.81

### Sexual Orientation

The Equality Act 2010 requests scheme assessors consider the needs of lesbian, gay, and bisexual people within an EqIA and scheme development. Equalities issues relating to this group may include employment activities, access to specific services or safety and security issues due to homophobic hate crimes.

Information on population sexual orientation is limited. However, Sexual Identity by Region (2016) data is available. More recent (2017) data<sup>4</sup> is available for the UK, however there does not appear to be regional data publicly available, therefore 2016 data has been used. The following table presents the LGB percentage of population for the South East region (which is the lowest level of data available) as well as England as a whole.

Status	South East	England
Heterosexual / Straight	93.4%	93.0%
Gay / Lesbian	1.2%	1.2%
Bisexual	0.9%	0.7%
Other	0.5%	0.5%
Don't know/refuse	4.0%	4.5%

Although detailed statistics on LGBT groups are limited, the EqIA will consider representation of all LGBT groups within the assessment to ensure any likely impacts arising as a result of the scheme on these groups are considered. It can be seen that the number of people identifying as LGBT in the South East region is in line with the national average.

<sup>2</sup> The number of live births per 1,000 women aged 15-44. Measure of current fertility levels.

<sup>3</sup> The TFR is the average number of live children a group of women would have if they experienced the age-specific fertility rates for the calendar year in question throughout their childbearing lifespan. National TFRs are derived by summing single-year ASFRs over all ages within the childbearing lifespan.

<sup>4</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality>



## Area Background

### **Area Background - key considerations for the EqIA:**

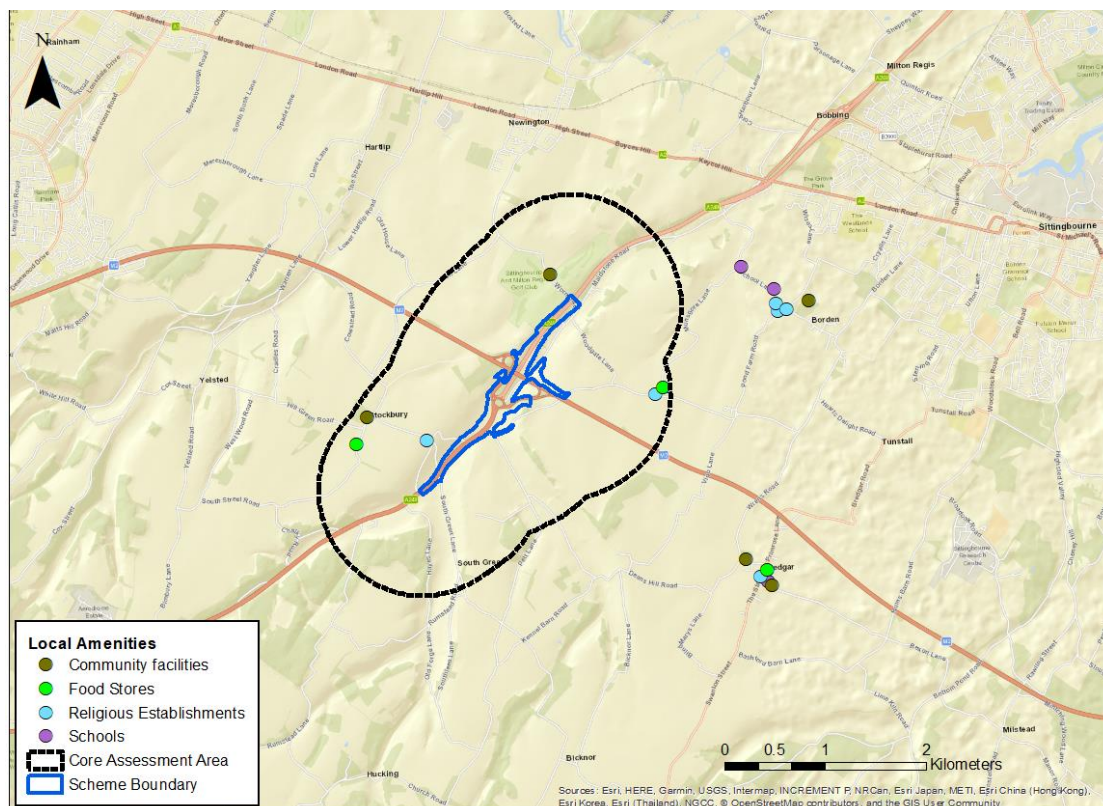
- There are a range of local community facilities relating to the PCGs that may be indirectly impacted as a result of the scheme, including schools and community facilities.
- Highest crimes reported in the core assessment area relate to violence and sexual offences, however, is slightly lower than the regional average;
- Second highest reported crimes are other theft, which is slightly higher than the regional average.

### Community Amenities

In addition to examining the composition of the resident population around the scheme, other factors and amenities in the local area that might be impacted by the scheme are also considered. This is to ensure that as well as the resident population, the daytime population - in terms of those visiting the area / travelling within the area to access local amenities - are also considered within the EqIA.

The community amenities presented in the following map and list are present within the core assessment area and should be considered within the EqIA.

**Figure 11: Community amenities in scheme area.**



The community amenities identified in Figure 11 are listed below, with those in the core assessment area in **bold**:

Community facilities

- **Sittingbourne Town Football Club**
- **Sittingbourne and Milton Regis Golf Course**
- Borden Cricket Club
- Bredgar Village Hall
- Bredgar Recreation Ground
- Borden Parish Hall

Food stores

- **Oad Street Food Arts and Crafts**
- **MB Market**
- Bredgar Farm Shop

Religious establishments

- **Wesleyan Chapel - Christian**
- **St. Mary Magdalen Church - Christian**
- The Vicarage - Christian
- St. Peter and St. Paul's Church – Christian
- St. John the Baptist Church – Christian

Schools

- Borden C of E Primary School
- Borden Village Pre-School
- Bredgar Church of England School

The majority of community amenities are located outside of the core assessment area clustered in the north east in Borden and south east in Bredgar. Within the core assessment area there are six community amenities to the north, east and west of the scheme boundary.

There are three schools in the area that should be taken into account when considering the impact of the scheme (particularly in relation to any impacts on routes to school, non-motorised user safety and any potential increase in air or noise pollution, as children in particular can be affected by these impacts). There are also several community facilities, food stores and religious establishments near the scheme. These amenities are likely to be attractors for a wide range of PCGs within the area, including older people for social interaction, children and specific religious groups (Christians).

In addition to those noted within the core assessment area, there are a number of facilities noted outside of the core assessment area which may be impacted as a result of the scheme – in particular any delays to traffic flow during the construction period through diversions or temporary facilities.

It should be noted that whilst identification of community facilities goes some way to understanding daytime populations in the core assessment area, the largest non-resident population present in the scheme area will be road users (drivers and passengers). There is however no widely available statistics on the

demographics of road users, and therefore presence of all PCGs are considered for this group.

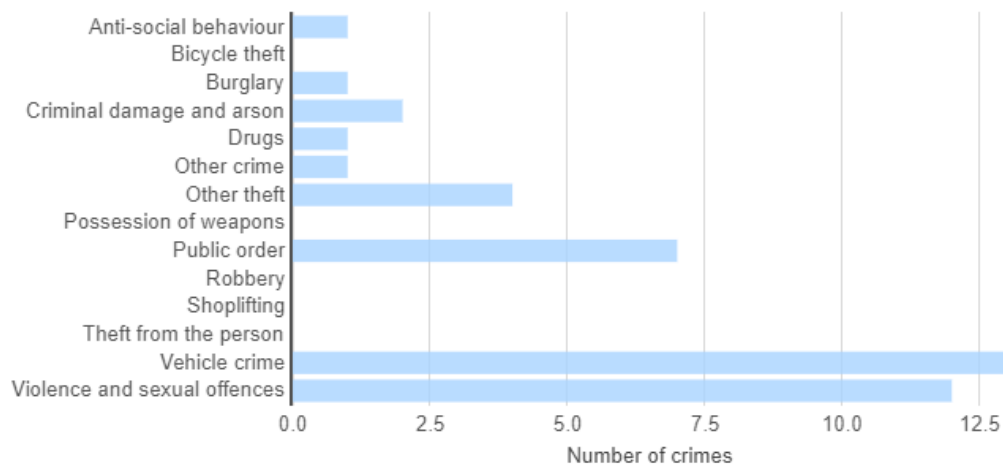
### Crime

In addition to examining the community facilities within the core assessment area, crime levels have also been examined. This allows increased understanding of the environments and sensitivities of the area. It also identifies areas for consideration in terms of safety and security, particularly around accessibility issues.

Reported crimes within Lower Super Output Areas (LSOAs) within the core assessment area between December 2018 and November 2019 have been summarised and are shown in Figure 12. They have also been compared to total crimes in the local area in Figure 13. There does not appear to be 2018 to 2019 data publicly available for total crimes in Kent, therefore data between September 2017 and September 2018 has been used and is shown in Figure 14.

The most frequently reported crime in the core assessment area is vehicle crime.

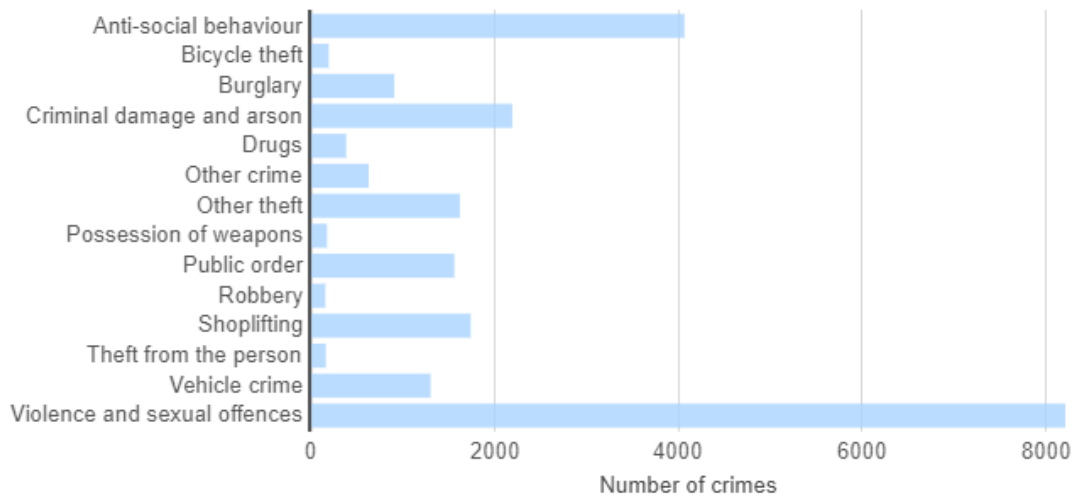
**Figure 12: Core Assessment Area Total Crimes – December 2018-November 2019<sup>5</sup>**



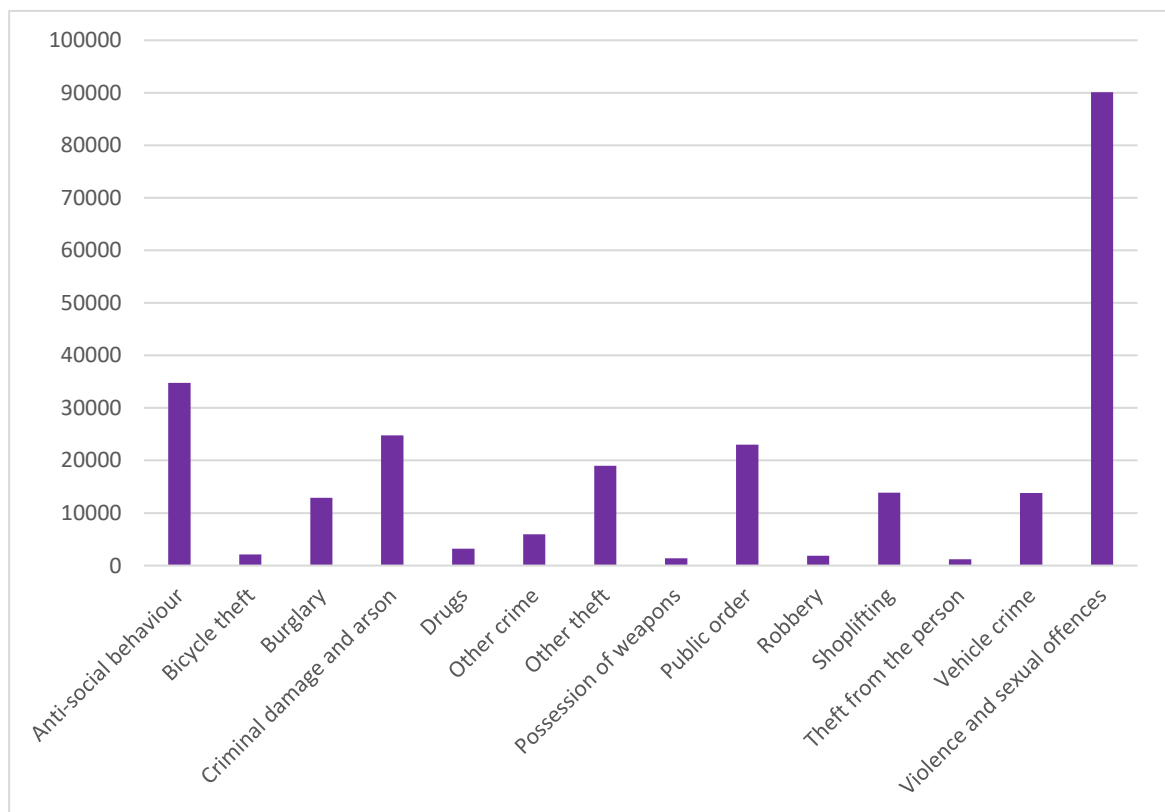
In the core assessment area, the most frequently reported crimes are vehicle crime and violence and sexual offences, followed by public order.

<sup>5</sup> <https://www.police.uk/kent/14/crime/+i3GjZD/stats/>

**Figure 13: Local Area (Medway, Maidstone, Sittingbourne) Total Crimes – December 2018-November 2019.<sup>6</sup>**



**Figure 14: Kent Total Crimes – September 2017-September 2018.**



As shown in the following table, broadly the proportion of crimes by type in the new core assessment areas is similar to those in the local area and Kent. There are notable exceptions; anti-social behaviour and violence and sexual offences are lower in the core assessment area than for the local area and Kent. Other

<sup>6</sup> <https://www.police.uk/kent/14/crime/+wDCBdA/stats/>

theft and vehicle crimes are higher in the core assessment area than for the local area and Kent.

Crime type	Core assessment area 2018/19	Local Area 2018/19	Kent 2017/18
Anti-social behaviour	2.4%	17.5%	14.0%
Bicycle theft	0%	0.8%	0.8%
Burglary	2.4%	3.9%	5.2%
Criminal damage and arson	4.4%	9.4%	10.0%
Drugs	2.4%	1.6%	1.3%
Other crime	2.4%	2.7%	2.4%
Other theft	9.5%	7%	7.7%
Possession of weapons	0%	0.7%	0.6%
Public order	16.7%	6.7%	9.3%
Robbery	0%	0.7%	0.8%
Shoplifting	0%	7.5%	5.6%
Theft from the person	0%	0.7%	0.5%
Vehicle crime	31%	5.6%	5.6%
Violence and sexual offences	28.6%	35.3%	36.3%

### Hate Crimes

Hate crime data has been examined as this relates specifically to the PCGs included within this assessment.

Data for the core study area is not available however Kent and England data are available. In 2016/17 (the most recent publicly available data) in Kent 1,983 hate crimes were reported, representing 2.4% of all hate crimes in England. There does not appear to be

As shown in the following table, there were significant increases in hate crimes relating to transgender (+218.2%), disability (+130.4%) and sexual orientation (+102.4%). All hate crimes by type increased, however, this may be partly due to more people reporting crimes.

Crime Type - Kent	2015/16	2016/17	Percentage change
Race	955	1,466	+53.5%
Religion	54	70	+29.6%
Sexual orientation	125	253	+102.4%
Disability	69	159	+130.4%
Transgender	11	35	+218.2%
Total number of hate crimes	1,214	1,983	+63.3%
Total number of offences	1,193	1,927	+61.5%

Hate crimes in the Kent area have been compared to the English national average. Hate crime statistics in Kent mirror the English profile. The largest difference is in hate crime against religious beliefs, which is 4% lower in Kent



compared to the national average. There are a slightly higher proportion of crimes relating to sexual orientation and disability in Kent compared to the national profile.

Hate Crime type	Kent	England
Race	74%	74%
Religion	3%	7%
Sexual orientation	13%	11%
Disability	8%	6%
Transgender	2%	1%

Additional consideration should be given of the presence of these hate crimes within the design of the scheme – specifically in the development of NMU access routes and diversions – so that personal safety is a vital consideration around the scheme during construction and operation. This is particularly important due to the rise in hate crimes within Kent; all schemes should seek to maximise accessibility for all.

### **Consultation**

#### *Key considerations:*

- *Requirement for accessible information on the scheme;*
- *Accessible consultation approach, materials and venues;*
- *Ensuring all relevant/impacted and interested parties are consulted;*
- *Consulting with the range of communities that represent PCGs,*
- *Ensuring findings obtained through the consultation are incorporated into the scheme design, such as access requirements to NMU routes and public transport services; and*
- *Ensuring issues identified by communities at consultation which present a disproportionate impact on PCGs are explored and mitigated.*

#### *Stage 2 Non-Statutory Public Consultations*

During stage 2, a non-statutory public consultation was undertaken September-October 2017, including a questionnaire and public consultation exhibitions. Locations included five (accessible) locations; Holiday Inn Sittingbourne, Stockbury Memorial Hall, Forum Shopping Centre, Sheppey Gateway and The Mall Maidstone. All venues had ramps with levelled area at the top for disabled access, including standard wheelchair access and electric wheelchair access. A SHARE link has been provided of Buildings Accessibility checklists for all of these venues.

The vast majority of respondents (94%) supported the need for an improvement scheme at the M2 Junction 5/A249 Stockbury Roundabout Junction. One option, Option 12a, was presented to the public. This was unsupported by the public, local authorities and local MP, who expressed issues with the use of traffic lights. As a result, Option 4 which incorporates a flyover option was revisited. This was supported strongly by the public.

A revised version of Option 4, referred to as Option 4H1, was developed to reduce costs, whilst minimising any reduction in the benefits. Option 4H1 reduces land take, meets stakeholder expectation, delivers twice the safety benefits of Option 12a and will ensure there are no traffic signals on the A249 mainline.

#### *Stage 3 Stakeholder Engagement*

During Stage 3, the preferred route of Option 4H1 was announced. Engagement was completed with statutory stakeholders, environmental bodies, landowners, and other Tier 1, 2 and 3 stakeholders. It was determined that no statutory or public consultations were required under HA1980 procedures in PCF Stage 3. It was decided that the scheme had little objection at the time so there was no need for public information events or engagement with wider stakeholders.

#### *Stage 4 Communication Planning*

Highways England, with Atkins, published a Communication Plan in advance of Stage 4 consultations solely for informative purposes. Ongoing stakeholder engagement is being undertaken as part of the Public Local Inquiry process. Other elements of stakeholder engagement as set out in the Outline Environmental Management Plan are on hold until the Public Local Inquiry is concluded. The plan will be updated following the Public Local Inquiry to be held in August 2020. This document provides information on future planning of communications. This includes preparation for publicity of orders, including:

- Updating webpage to support orders publication
- Communication of orders as per contact list and printing schedule (email and post)
- Press notices of orders publication
- Publicity of orders publication
- Ongoing liaison through to public inquiry with all key stakeholders
- Negotiations with those likely to or having objected, including bringing in technical specialists
- Responding to representations of published orders
- Supporting press and site notices as communication requirements around any public inquiry
- Handover in relation to specific Stage 5 activities including preparation for confirmed orders

To support equality and diversity in Stage 5, measures have been taken to enhance accessibility of the communication and engagement on the scheme. Publicity will be targeted at any hard to reach groups and communities which represent PCGs. No public consultation events will occur in Stage 4, but a Public Local Inquiry into the Orders for the scheme will be held in August 2020. The SHARE link for the Stage 4 Communication Plan detailing Stage 4 communications has been included.

## Summary

The data gathered demonstrates that there are a range of considerations that may potentially impact on some PCGs. The PCGs covering sex, age, disability, ethnicity & race, religion or belief and pregnancy and maternity have been highlighted as experiencing potentially disproportionate impacts as a result of the scheme. In general terms, these groups have been highlighted due to:

- **Physical accessibility** – Relating to the changes to NMU routes, the impact of diversions during construction and permanent changes to route for pedestrians (particularly where there are already high levels of crime and hate crime), road users, and on the local community as a result of traffic displacement and potential severance issues. Access to local community facilities should also be considered (direct or indirect impacts as a result of construction), for example schools, religious establishments, and community facilities. Particular consideration should be made to the relocation of local bus stops – if there will be a potential increase in travel distance to public transport services;
- **Accessibility of information on the project** – Appropriate information should be provided to inform local communities about the scheme both during construction and implementation. Information should be provided beforehand for journey planning and during the journey to ensure clear instruction when travelling along the route, particularly in relation to any diversions required as a result of construction. Whilst access to information is essential for all groups, there may be more specific requirements for children (i.e. in the event of an accident, travelling to/from school), young and/or unconfident drivers, older people, those with a physical or learning disability and those who do not have English as their first language. There will be a need for clear, understandable information on the scheme which includes consideration of those with learning disabilities, colour blindness, visual impairments, or those who do not have English as a first language.
- **Safety for drivers** – Impact on safety and security of travellers, particularly those who are more vulnerable and over represented in accidents, such as children, young males, and older people. Particular user groups may also be impacted along the scheme length or on impacted local roads such as pedestrians, cyclists and motorcyclists. As well as physical safety, this also considers perceived safety issues and whether more vulnerable or unconfident drivers and passengers or those travelling with young children will be impacted (particularly during construction).
- **Environmental impacts** – Noise or air quality impacts associated with the scheme, particularly for communities surrounding the scheme during construction, as well as any impacted local roads. PCGs specifically impacted during construction may include young children, older people and disability groups. During operation some PCGs will experience benefits in terms of less traffic within Stockbury Valley.
- **Creation of employment** – Jobs created during construction of the scheme. This may benefit local residents, particularly those who are unemployed or who are from minority backgrounds if a suitable employment strategy is adopted.

Following the publication of the Orders, 15 objections were received. A number of these were relevant to the following equality groups: Religion & Belief, Age, Disability and Pregnancy/Maternity. The concerns raised relevant to these groups were in relation to the safety of crossing the A249 to access Stockbury and associated community facilities. Requests were also made for an overbridge for NMUs to cross the A249.

The project team responded highlighting that the scheme has been designed to be safe and has gone through numerous safety review processes. It is also recommended that a reduced 50mph speed limit and average speed enforcement cameras are implemented along this section of the A249. This reduction in speed would further enhance the safety improvements the scheme is already providing along this section of the road.

Further consultation will be undertaken as part of the PLI, which is scheduled to take place from 28<sup>th</sup> August 2020 until 14<sup>th</sup> September 2020.

**Confirmation – Stating if a full equality impact assessment required or not**  
**(Appropriate Box Ticked)**

<b>Yes</b>	<b>X</b>	<ul style="list-style-type: none"> <li>• Adjustment required to prevent potential discriminatory practice and to remove barriers to equality of opportunity.</li> <li>• Further evidence/consultation required to enable sound equality decision making.</li> </ul> <p><b>Proceed to Sections D – H</b></p>
<b>No</b>		<ul style="list-style-type: none"> <li>• The policy/practice/proposal is robust in terms of equality.</li> <li>• The impact on different groups is considered to be 'neutral' with no risk of discrimination or any minor impacts can be justified.</li> </ul> <p><b>Proceed to Section E1 and Sign-off at H</b></p>

**D: ASSESSMENT****The level of impact on protected characteristics gauged from available information, research, consultation**

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
Gender			X	N/A No evidence to suggest disproportionate impacts on this group.
Religion & Belief		X		<p>There is considered to be a slight negative impact on people with religious beliefs. This is due to:</p> <ul style="list-style-type: none"> <li>• A potential increase in travel distance for those reaching religious establishments in the core assessment area, including access to St. Mary Magdalene Church due to the access road closure of Honeycrook Hill.</li> <li>• An increase in traffic during construction and the impact of the construction environment may disproportionately impact those attending religious establishments, predominantly Christians in the core assessment area.</li> </ul>
Age		X		<p>There is considered to be an overall negative impact on age as a result of the scheme. This is due to:</p> <ul style="list-style-type: none"> <li>• Required changes to travel (i.e. changes to access arrangements, travel routes, diversions) which may impact on unconfident drivers (young drivers and older drivers) as a result construction activity/diversions, children or elderly passengers if required to act in the event of an accident/incident during construction, or children and older people due changes to access routes for NMU routes due to unconfident travel behaviour and stress caused by changes to usual travel options;</li> <li>• The need for clear, simple information on the project and all communications/consultation on the project to ensure it is accessible for all regardless of age;</li> <li>• An increase in travel distance between local amenity/residences and public transport as a result of the relocation of bus stops, which may be unsuitable for those with limited mobility, including older people. Maintaining access to all transport services is a priority, specifically for those with specific travel requirements who may not have alternative means of travel.</li> </ul> <p>Although a negative impact has been identified for this group, there is some assumed mitigation through the development of an inclusive consultation and communication strategy. Other potential impacts identified will need to be monitored going forward in the scheme development, see Section F.</p>

				<p>It should be noted that working age groups may experience benefits associated with the scheme, through the creation of temporary employment opportunities during construction, and improvements to A-road and motorway links to access employment.</p>
Disability		X		<p>Overall there is a negative impact for those with a disability, this is due to:</p> <ul style="list-style-type: none"> <li>• A potential increase in travel distance between local amenity and public transport as a result of the relocation of bus stops on the A249 near Vale Cottages and the Church Hill junction to new proposed bus stops on the road linking Oad Street to the Stockbury Roundabout and north-east of the Church Hill junction. These may be unsuitable for those with mobility impairments. Maintaining access to all transport services is a priority, specifically for those with specific travel requirements who may not have alternative means of travel;</li> <li>• Disabled drivers or drivers with disabled passengers potentially being unconfident or needing specific recovery assistance in a breakdown situation, the effects of which may be exacerbated during construction;</li> <li>• Those with learning disabilities, cognitive impairments and mobility restrictions being unconfident with changes to their usual travel routes/behaviour which may arise as a result of construction activity – diversions, change in environment, NMU changes etc.;</li> <li>• The need for clear, simple information on the project and all communications/consultation on the project to ensure it is accessible for all including those with learning disabilities, visual impairments, colour blindness etc.</li> </ul> <p>Although a negative impact has been identified for this group, there is some assumed mitigation through the development of an inclusive consultation and communication strategy. Other potential impacts identified will need to be monitored going forward in the scheme development, see Section F.</p>
Ethnicity & Race			X	<p>Ethnicity and Race has been considered due to potential language barriers for those whose first language is not English, and the need for suitable communication materials to meet language need. This covers those resident in the area, and also foreign drivers who may be unfamiliar with English highways.</p> <p>Ethnicity statistics for the core and wider assessment areas have been examined and there are no considerable differences between this and the local and national averages. Ethnicity data provides an indication of ethnic background, but not necessarily the detail on nationality and therefore language requirements.</p>



				Overall, a neutral impact is considered on this group, on the assumption that all consultation and project communications have been, and will continue to be provided in plain English, and translation services offered if requested for those who do not have English as their first language.
Sexual Orientation			X	N/A No evidence to suggest disproportionate impacts on this group. However, scheme design should consider these groups and maximise accessibility and (actual and perceived) safety due to the prevalence of hate crimes for this group.
Transgender/ Transsexual			X	N/A No evidence to suggest disproportionate impacts on this group. However, scheme design should consider these groups and maximise accessibility and (actual and perceived) safety due to the prevalence of hate crimes for this group.
Pregnancy/ maternity		X		A potentially slight negative impact is noted for the pregnancy/maternity group due to potential safety and security issues when travelling with young children i.e. safety issues in the event of a breakdown / accident / incident during construction, and due to changes in travel routes/behaviours during construction. Indirect impacts on journeys to school, nurseries and other education establishments as a result of construction activity, diversions etc. may also present negative impacts for this group. This group may also be reliant on public transport for their journeys, and the potential increased walk distance to public transport stops north-east of the Church Hill exit onto the A249 may be unsuitable for those pregnant or travelling with buggies and small children.
Marriage and Civil Partnerships			X	N/A No evidence to suggest disproportionate impacts on this group

**Potential Risks Identified – Including insufficient information to make robust decisions (Appropriate Yes/No ticked)**

No		
Yes (Mitigating action shown in Section F)	X	None identified

**E: Options: The rationale behind the decision reached from this analysis.**

E1: Continue the work - no changes required as identified at the screening stage or following additional analysis in Section D) (There are no unjustified negative impacts and the policy/practice is compliant in terms of the equality duty)	
E2: Adjust the policy/practice, or ensure further evidence is gathered to ensure any barriers are removed as identified and referenced in Sections F and G (Opportunities were identified to advance equality, foster good relation and prevent discrimination)	x
E3: Stop and remove the policy/practice (Sign Off in Section H) (A negative impact has been identified that cannot be justified)	

**F: Description of additional evidence, research and consultation undertaken, required, ongoing or captured to ascertain how the policy or practice will advance equality, prevent discrimination and/or foster good relations. (Reference the evidence sources).**  
(Including how internal scoping tools such as EDIT have been utilised and, how this work has influenced other assessments such as the social aspects of environmental assessments)

Activities to address any potential negative impacts or risks and deliver positive impacts	Activity & Completion dates
Review the EqIA when findings from future public consultations are available, to ensure all potential impacts on PCGs are identified and mitigated effectively.	Ongoing
Ongoing monitoring / recording of any impacts raised by PCGs in relation to the scheme should be undertaken to ensure suitable mitigation is included/developed as the project progresses, and this EqIA updated accordingly.	Ongoing
Liaison with communication team on information strategy and to ensure an accessible information and consultation approach is adopted (pre and during construction and operation) and any relevant information is included in the EqIA as the project progresses.	Ongoing

Ensure contractors appointed to construct the scheme are provided with the most up to date EqlA, and suitable approaches are taken to maximise benefits of the scheme, i.e. considerate constructor approaches, inclusive recruitment approaches etc.	Ongoing
Continue engagement with designers, and (as appropriate) develop mitigation to minimise impact of permanent relocation of bus stops with regard to access to community amenities. Ensure mitigation is accessible and sustainable.	Ongoing

**Summary of the findings, including details of consultation with communities/customers/groups/stakeholders/staff/professional organisations, explaining how this has shaped the development of the practice or policy:**

Discussed in Section B.

**Where available and appropriate – Photographic evidence/link:**

N/A

**Where appropriate - Link to communication/inclusion plans, environmental assessments or EDIT exercises (For internal use only):**

The Communication Plan for the scheme can be found here: [Communication Plan SHARE LINK](#)

Highways England Buildings Accessibility checklists for the stage 2 non-statutory public consultation can be found here: [Building Accessibility Checklist SHARE LINK](#)

EDIT Assessment completed for the project can be found here: [EDIT SHARE LINK \(updated March 2020\)](#)

**G: Monitoring Activity**

**Agreed actions to implement the findings of this assessment.**

**(For relevant schemes, this includes planned POPE reviews, Post Implementation/Investment Reviews and compliance with other internal monitoring systems such as the Project Control Framework).**

<b>Monitoring Action</b>	<b>By Whom</b>	<b>By When</b>
Ongoing monitoring / recording of any impacts raised by PCGs should be undertaken to ensure suitable mitigation is included/developed as the project progresses, and this EqlA updated accordingly.	Project Manager and Equalities Officers	Ongoing
Liaison with communication team on information strategy and any consultation undertaken to ensure an accessible information and consultation approach is	Equalities Officers and Communication Team	Ongoing

adopted, and any findings relevant to PCGs are included in this EqIA.		
Monitoring of approach to construction employment should be undertaken to maximise benefits to local unemployed / local workforce. This will be relevant from Stage 4 onwards.	Project Manager and Equalities Officers	Ongoing
Periodic reviews of the EqIA as the project progresses (in line with above monitoring actions and any design changes, phases of work and new information relevant to the EqIA) to ensure all impacts are captured, mitigated and monitored accordingly.	Equalities Officers	Ongoing
<b>Where appropriate – link to Photographic evidence:</b>		
<b>H: Senior responsible delegate Sign-Off:</b>		
<b>Name</b>		<b>Date</b>
<b>Job Title</b>		
<b>In submitting this EqIA the senior delegate has:</b>		
<b>Approved all activity including monitoring actions</b>		
Submitted documentation to the <a href="#">Directorate's Diversity Advocate</a> (CO, NDD, PTS, MP FBS etc.) for quality assurance and registration.		<b>Ref no</b>
For all MP schemes please contact <a href="#">MP Representative for the Agency Diversity Group</a>		
<b>Considered the documentation as robust and suitable for publication</b>		
<b>Checked that the documentation is saved in the EqIA area of the internal filing system and is retained as a record and as part of good governance.</b>		