

West of Cheltenham Transport Improvement Scheme UK Cyber Business Park

Due Regard Statement

Gloucestershire County Council

03 September 2019



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This document has 18 pages including the cover.

Document history

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
Rev 1.0	Draft for review	AD	LC	NG	CM	08 August 2019
Rev 2.0	Final submission	AD	SG	NG	CM	03 September 2019

Client signoff

Client	Gloucestershire County Council
Project	West of Cheltenham Transport Improvement Scheme UK Cyber Business Park
Job number	5188734 / 5188770
Client signature / date	

1. Initial Equality Impact Assessment and Analysis (EqIAA)

Please use this statement to evidence how ‘due regard to’ the three aims of the public sector equality duty has been made (section 149 of the Equality Act 2010) during the development of the ‘policy’.

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by the ACT¹;
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- Foster good relations between people who share a protected characteristic.

Name of the ‘policy’:	West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park
Person(s) responsible for completing this statement	Nicola Glover/Aoife Dudley, Atkins Limited
Briefly describe the activity being considered including aims and expected outcomes	<p>The UK Cyber Business Park is a £22M proposal including 45 hectares of employment land focussed on cyber industries generating new high skilled jobs, together with facilitating the delivery of the GCHQ Cyber Innovation Centre. There will also be improvements to local transport infrastructure and areas of high-quality housing. Overall the scheme aims to grow Gloucestershire’s working age populations by keeping and attracting more highly skilled 18-40 year olds.</p> <p>Figure 1-1 shows a map of the scheme, detailing the phases of implementation. The West of Cheltenham Transport Improvement Scheme will comprise of the following four stages:</p> <ul style="list-style-type: none"> • Phase 1 – Arle Court Roundabout <ul style="list-style-type: none"> ○ Provision of an additional lane on the roundabout ○ Additional approach lanes to the A40 ○ New bus and cycle facilities ○ Widening the Hatherley Lane arm of the roundabout, and building a Park and Ride entrance/exit westbound • Phase 2 – M5 Junction 11 southbound slip road to Arle Court Roundabout

¹ As stated in the Equality Act 2010. Protected characteristic groups include: Age, Disability, Gender Reassignment, Pregnancy and Maternity, Race, Religion, Sex, Sexual orientation, Marriage and Civil Partnership

- Extending Badgeworth Road Bridge
- Phase 3 – Arle Court Roundabout to Benhall Roundabout
 - Arle Court to Telstar Way eastbound carriageway improvements
 - Improving cycle access between the roundabouts
 - Telstar Way to Benhall Roundabout eastbound carriageway widening
 - Telstar Way widening to Hubble Road
- Phase 4 - Benhall Roundabout to Griffiths Avenue
 - Benhall Roundabout remodelling including eastbound widening
 - Cycle and pedestrian infrastructure improvements

Open Street Map – © OpenStreetMap Contributors

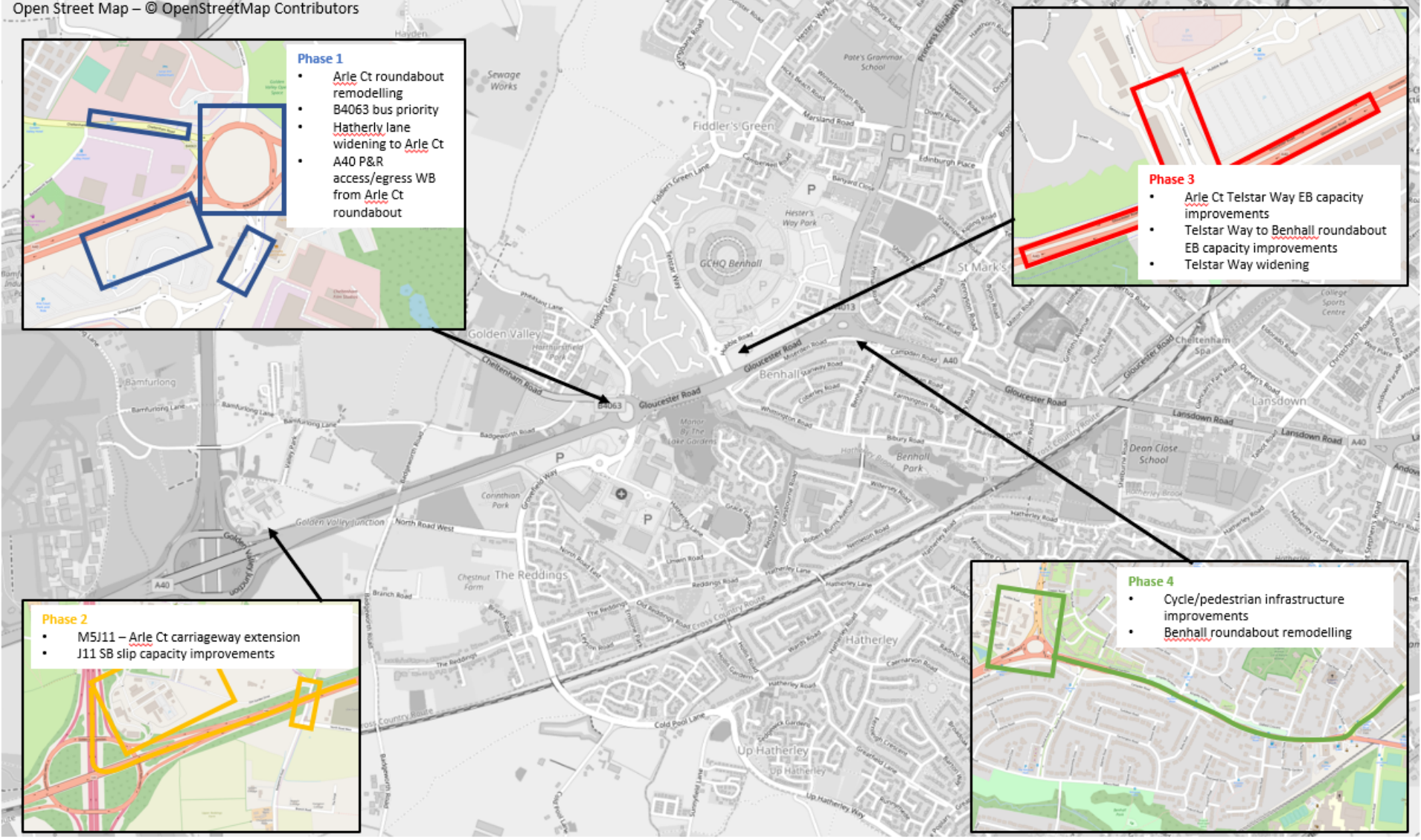


Figure 1-1 - Map of scheme area

Contains sensitive information
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2. Documenting Use of Sufficient Information

Please document below the data and information sources that you have used to understand the needs, participation and experiences of each protected group. Evidence must be gathered as the policy is developed and used to inform decisions.

Service user data

Service user data is an important source of evidence and should be collated as part of routine monitoring of in-house or external services. If service user data is not available record 'not known' and use the action plan to identify what improvement actions will be used to gather data going forward.

Service user diversity reports are available [on our website](#) and give an indication of service user participation across commissioning areas, for example adult residential services and youth services. It does not include participation data at individual service level.

Needs analysis

Gloucestershire population data is available to understand the representation of different protected groups across the county and help with needs analysis. Data like this may also be also useful for benchmarking to identify under or over representation of a service by any of the protected groups². For example, a service is open to all residents and monitoring has shown 2% of service users are disabled: However, demographic data indicates that 16% of Gloucestershire residents report having a disability or long-term limiting illness. This finding can be used to explore if there are barriers to participation by residents with disabilities and how this can be addressed as part of the development of your 'policy'.

Data gaps

You may find that you have more information about some of the protected groups, for example gender, age and disability, and less about others, for example sexual orientation and religion and/or belief. If data is not available and you intend to start collating data about a protected characteristic, please use the action plan to outline how this data will be collated. You can find equality monitoring guidance [on our website](#) including an equality monitoring template.

If you have no plans to start collating data about a protected characteristic, please state the rational why.

Service information (if applicable) or Needs analysis (if applicable)

Who is responsible for delivering the service?

Gloucestershire County Council (GCC) have taken over the planning of the scheme.
The construction will be carried out by an approved contractor determined through GCC's procurement policy.

Service user data/Needs analysis information

For the purpose of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park, service users are defined as:

- The local population – residing within output areas (OAs) within 1km of the scheme alignment. This used the most current OAs from the 2011 Census. This enables an understanding of the impact of the construction and operation of the scheme on local residents. The population rates have been compared with local authority rates (combined rates for Cheltenham, Gloucester and Tewkesbury) and national rates in order to identify the significance of the potential impact on each of the specific groups.
- Potential users of the scheme – this will include both local residents and people living further afield. However, as clear information on user data is unavailable at this time, it is recommended that additional data be collected on the patronage demographic composition post scheme opening, to ensure a continuing duty to meet with the objectives in the Equality Act 2010. More information regarding the monitoring of service users can be found in the monitoring and review section of this statement.

<p>Age</p>	<p>Children – The Equality Act 2010 states that due regard should be given to the impacts on younger people and older people. Analysis of 2011 Census data shows that 16.4% of the population within 1km of the scheme are aged under 16, which is slightly lower than the local and national rates. There are a number of educational establishments in the area, including:</p> <ul style="list-style-type: none"> • Happy Days Nursery & Preschool • St Mark’s C of E Junior School • Benhall Infant School & Nursery • Foxcubs Day Nursery • Lakeside Primary School • St Thomas Moore Preschool & Nursery • St Thomas Moore Primary School <p>Happy Days Nursery & Preschool is situated close to Phase 1 of the project, and St Mark’s School is situated close to Phase 4. Due regard should be given to the impact of the construction of these schemes on the children, who can be disproportionately affected by an increase in noise, which can adversely impact on concentration and consequently their cognitive ability. There is a high concentration of children on Princess Elizabeth Way in Cheltenham, and this will need to be considered alongside any planned disruption or adverse impacts from the construction, particularly for pedestrians.</p> <p>Older people – The proportion of people aged over 65 in the scheme area is 8.6%, which is similar to the local area but lower than the country as a whole. Due regard should be given to the impact of the scheme on this group, particularly in residential areas and where the scheme may impact access to facilities which are of interest to this group.</p>
<p>Disability</p>	<p>Due regard should be given to those people with disabilities and the impact that scheme will have on them. The proportion of people claiming Disability Living Allowance (DLA) in the area around the scheme is 3.5%, which is in line with the local area, but lower than the national rate which is 6.5%. 16.4% of people in the area live with a Limiting Long-Term Illness, which is similar to the local and national rates. Considerations should be made to ensure that the area is accessible for these groups during the construction period, and where the scheme</p>

	may impact access to facilities that are of interest to them.
Sex	<p>Due regard should be given to the impact on people according to their sex, for example the impact on females using the transport network. Over half (51.1%) the population within 1km of the scheme area are female and may experience disproportionate impacts during construction and operation of the scheme. Although there is no local data to support this, it is assumed a higher proportion of females are likely to be at home during the day due to child care duties and are therefore more likely to be pedestrians. There are also safety concerns for many females if they are required to alter their usual routes due to a lack of access as a result of construction work, as they may be less familiar with their surroundings or be required to use less accessible routes to reach their destination.</p> <p>There is a high concentration of females on Princess Elizabeth Way in Cheltenham, and this will need to be considered alongside any planned disruption or adverse impacts from the construction, particularly for pedestrians.</p>
Race	<p>According to the 2011 Census data, the majority of people living within 1km of the scheme area are white – 95.4%, which is higher than both the local area and the national rate of 85.4%. People identifying as Asian or Asian British are the second largest group at 2.9%, and the remaining population is as follows: 1.1% mixed or multiple ethnic groups, 0.4% other ethnic groups and 0.1% black/African/Caribbean. The total of Black and Minority Ethnic Groups in the area is 4.6%.</p>
Gender reassignment	<p>There is currently no information available regarding the proportion of people who have undergone or going through the process of gender reassignment. Transgender users of the scheme may have a higher risk of being targets of hate crime, so it is important to consider safety features of the scheme that may mitigate these scenarios.</p>
Marriage & civil partnership	<p>Married couples make up 45.8% of the population around the scheme area, as well as 0.1% civil partnerships. 22% of the population are single, 8.3% divorced, 5.9% widowed and 1.5% separated. There is unlikely to be any significant impacts on this group compared to the population as a whole.</p>
Pregnancy & maternity	<p>There is currently no information available regarding the proportion of people who are pregnant. Therefore, an approximation of relative rates of pregnancy and maternity in the area as compared to local authority and national rates has been calculated, using live births within the local area as well as the General and Total Fertility Rates. Cheltenham, Gloucester and Tewkesbury had a combined 3,966 live births in 2017. The General Fertility Rate (lives births per 1000 women) for Cheltenham (which is closest to the scheme area) is 55.0, compared with 58.1 and 61.2 at the local and national levels respectively. The Total Fertility Rate is lower in Cheltenham than in any other area. There may be some facilities in the area to which access is important to this group, such as healthcare facilities and nurseries.</p>
Religion or belief	<p>The majority of the population within 1km of the scheme area are Christian at 63.8%, and there are a further 33.3% who describe themselves as having no religion. The remaining population identify as: 1.1% Muslim, 0.7% Hindu, 0.4% other religion, 0.3% Sikh, 0.2% Jewish and 0.2% Buddhist. There is one church in the vicinity of the scheme area, the C3 Church Cheltenham, but this is unlikely to be impacted by the construction or operation of the scheme.</p>
Sexual orientation	<p>There is limited data available on sexual orientation of residents living in a specific area. Data from the south west region was used (as this is the lowest level of data available), which shows 92.3% of people in the South West identify as straight, with comparable proportions of gay, bisexual and other sexual orientations to the data for England.</p>

Other Information

A full Equality Impact Assessment has been undertaken for the West of Cheltenham Transport Improvement Scheme. This provides a more detailed breakdown of the socio-demographic profile of the area by protected characteristic groups, as well as other potentially vulnerable groups residing in the scheme area. Where appropriate, these statistics are also presented as maps to show the distribution of protected characteristic group prevalence.

It is recommended that following six months to one year after opening that a user survey be undertaken requesting information on home postcode, age band, sex, disability, race, pregnancy and maternity/ people travelling with young children. This could be undertaken as part of a wider survey but should examine the user profile in terms of groups with protected characteristics.

Workforce Data

Please document details of GCC staff only if they will be affected by the proposed activity. This could include GCC staff transferring under TUPE to a new service provider, relocating, employment at risk. GCC Workforce diversity reports are available [on our website](#).

Total number of GCC staff affected	Not affected
Age	
Disability	
Sex	
Race	
Gender reassignment	
Marriage & civil partnership	
Pregnancy & maternity	
Religion or belief	
Sexual orientation	

3. Consultation and Engagement

List all types of consultation that have taken place during the development of this activity. Include on-line consultations, events, meetings with stakeholders, community events, employee consultation exercises etc.

Service users	<p>Extensive consultation has taken place with prescribed consultees and the local community. A range of communication techniques and consultation events have been undertaken, to ensure that both the public and stakeholders had the opportunity to comment on the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park. The methods included:</p> <ul style="list-style-type: none"> • Media – press releases issued during the pre-application process to include details of the consultation process and the public exhibitions. • Feedback form – dropped off to residents in the area and available at the exhibitions to gather views on the scheme. This was also available online (see below). • Webpage – containing information about the background of the scheme, links to supporting documents and the feedback form. • Exhibitions – two consultation events where members of the public and stakeholders could view the plans and details of the proposed schemes, as well as making comments and asking questions.
Workforce	GCC were invited to the consultations and encouraged to provide feedback via the feedback forms.
Partners	
External providers of services	

4. Equality Analysis: Summary of what the evidence shows and how it has been used

This section will allow you to outline how the evidence has been used to show ‘due regard’ to the three aims of the general equality duty. It is important that this consideration is thorough and based on sufficient information. Consideration should be relevant and proportionate.

There are three aims of the general equality duty:

- Eliminate discrimination
- Advance equality of opportunity
- Promote good relations

Protected Group	Challenge or opportunity considered and what was done
Age (A)	<p>Design</p> <ul style="list-style-type: none"> • The scheme area has a slightly lower proportion of older people than the local and national averages. Accessible design has considered the movement of older people in terms of pedestrian facilities, appropriate lighting and CCTV. • Better access for pedestrians and cyclists will help families with younger children get to the educational establishments in the area safely. <p>Construction</p> <ul style="list-style-type: none"> • There is a potential challenge of the impact of construction traffic causing severance for older people and children who are the more vulnerable pedestrians. • The potential noise from construction could also be a negative impact, especially for children, as research has shown that noise can affect concentration levels of children. However, noise impacts will be fully analysed and mitigated within the Environmental Impact Assessment and Construction Environmental Management Plan. Schools in the surrounding area are not within the noise impact area. • Information provision – consideration will be given to ensure materials are accessible for older people e.g. use of hard copy newsletters in addition to electronic issue. • Contractors responsible for the construction of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park should adhere to appropriate code of conduct and should not discriminate by age of workers where relevant. • Cheltenham Spa Rail Station falls within the scheme extent, and consideration needs to be given so that access to the station by foot

	<p>is not limited. Ongoing engineering works at the station overlap with the scheme and have limited available parking, which may further the impact on some users and increase pedestrian traffic in the area.</p> <p>Operation</p> <ul style="list-style-type: none"> • There is a potential reduction in congestion levels in the area which could provide a benefit for those living in the local area including older people and children resulting in better accessibility and reducing severance.
Disability (D)	<p>Design</p> <ul style="list-style-type: none"> • Accessible design should consider the movement of people with disabilities in terms of pedestrian facilities. Routes need to be appropriately lit and signposted, with designated crossing points and tactile paving. Reprofiting of the B4063 has also been considered to ensure that it is not too steep for disabled users. <p>Construction</p> <ul style="list-style-type: none"> • Potential challenge of the impact of construction traffic causing severance for people with disabilities, who are more vulnerable pedestrians, and therefore reducing accessibility. However, it is considered that this impact is likely to be insignificant due to the low number of pedestrians currently using the area, and easy access for construction traffic from major roads. • Contractors responsible for the construction of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park should adhere to appropriate code of conduct and not discriminate based on disability where appropriate. • Cheltenham Spa Rail Station falls within the scheme extent, and consideration needs to be given so that access to the station by foot is not limited. Ongoing engineering works at the station overlap with the scheme and have limited available parking, which may further the impact on some users and increase pedestrian traffic in the area. <p>Operation</p> <ul style="list-style-type: none"> • There is a potential reduction in congestion levels in the area that could provide a benefit for those living in the local area, including people with disabilities resulting in better accessibility and reducing severance. • Accessible elements of the scheme should be ongoing and monitored i.e. signage and accessible crossing points.
Sex (S)	<p>Design</p> <ul style="list-style-type: none"> • Consideration has been given to security issues for female pedestrians, especially when it is dark, through appropriate lighting of the footpaths. <p>Construction</p> <ul style="list-style-type: none"> • Potential challenge of the impact of construction traffic causing severance for pedestrians including females who are potentially more vulnerable pedestrians in terms of security and safety. However, it is considered that is impact is likely to be insignificant due to the low number of pedestrians currently using the area, and easy access for construction traffic from major roads. • Contractors responsible for the construction of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park should adhere to appropriate code of conduct and should not discriminate by sex of employee. Appropriate policy should be

	<p>implemented in terms of harassment of females in the workplace.</p> <ul style="list-style-type: none"> Cheltenham Spa Rail Station falls within the scheme extent, and consideration needs to be given so that access to the station by foot is not limited. Ongoing engineering works at the station overlap with the scheme and have limited available parking, which may further the impact on some users and increase pedestrian traffic in the area <p>Operation</p> <ul style="list-style-type: none"> There are potential to foster positive outcomes for pedestrians, in terms of security by improvements to crossing facilities at the roundabout. This could have implications for females who are potentially more vulnerable to crime.
Race (R)	<p>Construction</p> <ul style="list-style-type: none"> Contractors responsible for the construction of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park should adhere to appropriate code of conduct and should not discriminate by race of employee. <p>Operation</p> <ul style="list-style-type: none"> There are no expected impacts on race upon delivery of the scheme.
Gender Reassignment (GR)	<p>Construction</p> <ul style="list-style-type: none"> Contractors responsible for the construction of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park should adhere to appropriate code of conduct and should not discriminate by gender of workers. <p>Operation</p> <ul style="list-style-type: none"> There are no expected impacts on gender reassignment upon delivery of the scheme.
Marriage & civil partnership (MCP)	<p>Marriage and civil partnership are not considered for this equality impact assessment as there is unlikely to be any significant impacts on this group relative to the population as a whole.</p>
Pregnancy & maternity (PM)	<p>Design</p> <ul style="list-style-type: none"> Accessible design should consider the movement of people who are pregnant or are travelling with pushchairs. Routes need to be appropriately lit and signposted, with designated crossing points. Reprofiting of the B4063 has also been considered to ensure that it is not too steep for pushchair users. <p>Construction</p> <ul style="list-style-type: none"> Potential challenge of the impact of construction traffic causing severance for pedestrians including parents with young children, who are potentially more vulnerable pedestrians in terms of accessibility. Construction may also make it difficult for pushchair users to access the footpaths in the area, so consideration should be given to

	<p>signposting alternative routes where necessary.</p> <ul style="list-style-type: none"> Contractors responsible for the construction of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park site should have a clear policy in terms of the recruitment and employment rights of all people including a clear maternity/paternity policy. Cheltenham Spa Rail Station falls within the scheme extent, and consideration needs to be given so that access to the station by foot is not limited. Ongoing engineering works at the station overlap with the scheme and have limited available parking, which may further the impact on some users and increase pedestrian traffic in the area
<p>Religion and/or belief (RAOB)</p>	<p>Design</p> <ul style="list-style-type: none"> Consideration should be given to ensure that religious communities are not prevented from accessing places of worship or other facilities that they regularly use. This is not anticipated to be an issue however, as the only religious establishment in the local area is far enough away from the site that it will not be affected. <p>Construction</p> <ul style="list-style-type: none"> Contractors responsible for the construction of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park should adhere to appropriate code of conduct and should not discriminate by the religious faith or beliefs of workers and ensure that these beliefs are respected at the workplace. <p>Operation</p> <ul style="list-style-type: none"> There are no expected impacts on religion and/or belief upon delivery of the scheme.
<p>Sexual Orientation (SO)</p>	<p>Construction</p> <ul style="list-style-type: none"> Contractors responsible for the construction of the West of Cheltenham Transport Improvement Scheme – UK Cyber Business Park should adhere to appropriate code of conduct and should not discriminate by the sexual orientation of workers. <p>Operation</p> <ul style="list-style-type: none"> There are no expected impacts on sexual orientation upon delivery of the scheme.

5. Strengthening Actions: Planning for further improvements

Please outline here what actions are required for further improvements to address challenges or opportunities, for example:

- Arrangements for continued/new engagement with stakeholders, staff, service users
- Plans to close data gaps across any of the protected characteristics through reviewed contract management arrangements
- Identify other plans already underway to address the challenges or opportunities identified in this statement
- Share findings with partner organisations.

If none, state 'none' below.

Action Plan

Action	Who is accountable	Timeframe
Incorporating equality issues arising from consultation and the EqlA into the detailed design stage. Ensuring accessible design principles consider the needs of groups with protected characteristics.	Gloucestershire Highways/GCC	Detailed design stage which is currently ongoing (and monitoring of usage after scheme opening)
Appropriate traffic management plan and information provision during construction stage to consider severance and obstruction issues for those with protected characteristics.	Main contractor/Gloucestershire Highways/GCC	Prior to and throughout construction stage
Supply of equality and diversity policy details from external contractors involved in the provision of construction and operation services.	Main contractor/bus operator/park and ride site maintenance company/GCC	To be provided during the tender/procurement process
Monitoring of service users once in operation to identify if groups with protected characteristics are being discriminated against or if this scheme is advancing opportunities for these groups. This should be done through user surveys.	GCC	Six months to one year after scheme opening

6. Monitoring and Review

Please indicate what processes/actions will be put into place to keep this 'activity' under review. For example, will progress be monitored/reported to a board, scrutiny committee, project board etc.

Review of Due Regard Statement

All of the above actions should be monitored on a regular basis and progress on these reported to the project board meeting on a monthly basis.

The current stage of scheme development is the detailed design stage of the scheme. It is therefore recommended that this statement be reviewed and updated on completion of the design stage and at relevant points (i.e. on completion of design, on completion of construction, after opening etc) to ensure a continuing duty of regard for equality impacts on groups with protected characteristics.

Monitoring of Service Users

The Equality Act 2010 states that service providers have a continuing duty to consider impacts on groups with protected characteristics and therefore monitoring of users once the scheme is operational will be required to ensure that equality issues are being considered and evolved after opening, as per the list below:

- Age
- Disability
- Sex
- Ethnicity

Additionally, any information on incidents/accidents or in the area around the scheme will be analysed according to the characteristics of the victim if the information is available.

7. Sign off and Scrutiny

By signing this statement off as complete you are confirming that 'you' have examined sufficient information across all the protected groups and used that information to show due regard to the three aims of the general duty. This has informed the development of the activity.

Senior level sign off: Alan Bullock	<i>A. Bullock</i>	Date: 7 th October 2019
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I am in agreement that sufficient information and analysis has been used to inform the development of this 'activity' and that any proposed improvement actions are appropriate and I confirm that I as the decision maker have been able to show due regard to the needs set out in section 149 of the Equality Act 2010.

Name of relevant Portfolio Holder/Cabinet Member: Councillor Nigel Moor, Cabinet Member for Environment and Planning		
Signed by Portfolio Holder/Cabinet Member: Nigel Moor	<i>Nigel Moor</i>	Date: 7 th October 2019

8. Publication

If this statement accompanies cabinet paper it will be published as part of the cabinet report publication process. Statements accompanying cabinet reports are also published on our website. If this statement is not to be submitted with a cabinet paper please maintain a copy for your own records that can be retrieved for internal review and also in case of future challenge.

Aoife Dudley
Atkins Limited
The Axis
10 Holliday Street
Birmingham
B1 1TF

aoife.dudley@atkinsglobal.com

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