

## Equality Impact Assessment (EIA)

This document demonstrates how the council is meeting its duties under the Equality Act 2010, by giving due regard to the requirement to: eliminate discrimination; advance equality of opportunity; and promote good relations.

### 1. Background

Directorate	Economy, Environment and Infrastructure
Service area	Strategic Planning
Title of the activity being assessed i.e. the strategy, plan, policy or service	Scheme development funding for M5 Junction 9 and A46 (Ashchurch) Strategic Transport Scheme in 2023/24
Brief outline of the proposal(s)	<p>To deliver the Outline Business Case (OBC) for the M5 Junction 9/A46 highways scheme.</p> <p>The following infrastructure upgrades together form the M5 Junction 9 and A46 (Ashchurch) Transport Scheme:</p> <ul style="list-style-type: none"> <li>• A new or extended motorway junction at M5 Junction 9;</li> <li>• Potential active travel infrastructure and related measures</li> <li>• Potential bypasses of the A46 to Teddington Hands roundabout;</li> <li>• Potential online improvements elsewhere on the M5 and A46 to support additional demand.</li> </ul>
Who is affected by the proposals?	<p>Service users <input checked="" type="checkbox"/> Workforce <input checked="" type="checkbox"/></p> <p>Other, please specify: <input type="text"/></p>
Decision to be taken and decision maker	<p>That Cabinet:</p> <p>Delegates authority to the Executive Director of Economy, Environment and Infrastructure to procure the continuation of development work (OBC delivery) on the M5 junction 9/A46 (Ashchurch) transport scheme under our Professional Services contract, to undertake a non-statutory public consultation, and to submit the SOC and OBC to the Department for Transport once complete.</p>

Person(s) responsible for completing this assessment	Dr Dave Land; Principal Transport Planner
Date of this assessment	27/2/23

## 2. Information Gathering

Briefly outline your approach to consultation and engagement, together with details of any other information and data sources you have utilised:

Research, Consultation and Engagement	
Service users	<p>Non-statutory consultation; Summer 2023</p> <p>The approach for engagement going forward is detailed in the Communications Plan and has been agreed with GCC project management and communications teams. A statutory consultation is planned for Summer 2023.</p> <p>The consultation exercise follows all current advice on engagement of residents with protected characteristics. Specialist consultants are delivering the consultation on our behalf to ensure all best practice is followed. See below for details of how seldom-heard groups will be approached during consultation.</p>
Workforce	<p>Members of the GCC workforce who might be affected by the proposed scheme could include staff that are relocating. GCC Workforce diversity reports are available on the GCC website<sup>1</sup>.</p>
Partners	<p>Project Board/Steering Group meetings have been held at which scheme and progress updates are shared with project partners. Attendees include Tewksbury Borough Council, Highways England, GFirst LEP, Atkins and GCC.</p> <ul style="list-style-type: none"> <li>• Weekly meetings are held with GCC, Atkins and Tewkesbury borough Council</li> <li>• Regular meetings are held with GCC, Atkins, Tewkesbury borough Council and National Highways</li> <li>• Regular briefing sessions are held with GCC, Atkins, Tewkesbury borough Council, National Highways, Department for Transport and Homes England.</li> </ul> <p>Specific reference to any equality matters are referenced where relevant through meeting notes.</p>
Other	

<sup>1</sup> <https://www.gloucestershire.gov.uk/council-and-democracy/equalities-and-our-duties-under-the-equality-act-2010/equality-information-and-analysis>

### 3. Equality Assessment

Briefly explain your assessment of the impact of the proposed activity on the protected characteristics below. This section evidences how the council is giving due regard to the three aims of the general equality duty, which are to: eliminate discrimination; advance equality of opportunity; and promote good relations.

Protected Characteristic	Service Users	Workforce
Age	<p>Design</p> <ul style="list-style-type: none"> <li>• The scheme area has a slightly higher proportion of older people than the national average and this will sharply increase up to 2041. Accessible design has considered the movement of older people in terms of pedestrian facilities, appropriate lighting and CCTV.</li> <li>• Better access for pedestrians and cyclists will help families with younger children get to the educational establishments in the area safely.</li> </ul> <p>Vulnerable Users, especially children and older people, will benefit from the conditions created by traffic calming the old A46, whereby existing urban and residential areas will benefit from less traffic and reduced traffic speeds. Improved bus times and reliability through traffic reduction on the A46 will benefit the old and the young most.</p> <p>Traffic reduction and the management of traffic will favourably impact on local air quality, conferring benefits to the local population and particularly older and younger people.</p> <p>Construction</p>	Same as service users

	<ul style="list-style-type: none"> <li>• There is a potential challenge of the impact of construction traffic causing severance for older people and children who are the more vulnerable pedestrians.</li> <li>• 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.</li> <li>• 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.</li> <li>• Contractors responsible for the construction of the scheme should adhere to appropriate code of conduct and should not discriminate by age of workers where relevant.</li> </ul> <p>Operation 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.</p>	
Disability	<p>Design</p> <ul style="list-style-type: none"> <li>• Accessible design should consider the movement of people with disabilities in terms of pedestrian facilities. Routes need to be of appropriate width</li> </ul>	Same as service users

	<p>for users with mobility aids or wheelchairs, appropriately lit and signposted, with designated crossing points and tactile paving.</p> <ul style="list-style-type: none"><li>• Traffic calming and volume reduction on the old A46 will enable safer, more attractive road space and public realm for people with physical disabilities and sensory impairment. The reduction of traffic can lead to psychological benefits which disproportionately advantage some groups with disabilities</li></ul> <p>Construction</p> <ul style="list-style-type: none"><li>• 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.</li><li>• Contractors responsible for the construction of the M5 Junction 9 and A46 (Ashchurch) Transport Scheme should adhere to the appropriate code of conduct and not discriminate based on disability, where appropriate.</li></ul> <p>Operation</p> <ul style="list-style-type: none"><li>• 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 some physical and sensory disabilities resulting in better accessibility and reducing severance.</li></ul>	
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	<p>Accessible elements of the scheme should be ongoing and monitored i.e. signage and accessible crossing points.</p>	
Sex	<p>Design</p> <ul style="list-style-type: none"> <li>• Consideration has been given to security issues for female pedestrians, especially when it is dark, through appropriate lighting of the footpaths.</li> <li>• Women have less access to private cars than men and are the main users of public transport<sup>2</sup>. Overall, women make 15% more walking trips than men, so women are more likely to benefit, from improvements to active travel opportunities, which are enabled through traffic calming and volume reduction as delivered through this scheme in the neighbourhoods adjoining the old A46.</li> <li>• Significantly, in terms of killed and seriously injured (KSI) data males are more affected than females, nationally and in Gloucestershire). Therefore, measures to improve road safety and speed management in association with the M5 J9 may benefit male drivers.</li> </ul> <p>Construction</p> <ul style="list-style-type: none"> <li>• Potential challenge of the impact of construction traffic causing severance for pedestrians including females who are potentially</li> </ul>	Same as service users

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

	<p>more vulnerable pedestrians in terms of security and safety<sup>34</sup>. 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.</p> <ul style="list-style-type: none"> <li>Contractors responsible for the construction of the M5 Junction 9 and A46 (Ashchurch) Transport Scheme should adhere to appropriate code of conduct and should not discriminate by sex of employee. Appropriate policy should be implemented in terms of harassment of females in the workplace.</li> </ul> <p>Operation There is the potential to foster positive outcomes for pedestrians, in terms of security by improvements to crossing facilities on the A46. This could have positive implications for females who are potentially more vulnerable to crime.</p>	
Race	<p>Design</p> <ul style="list-style-type: none"> <li>There are no design features which impact upon race that we are aware of</li> </ul> <p>Construction</p> <ul style="list-style-type: none"> <li>Contractors responsible for the construction of the M5</li> </ul>	Same as service users

<sup>3</sup> <https://www.roadsafetyfacility.org/news/who-safer-road-men-or-women>

<sup>4</sup> Transport Engineering, CIT2018 Women's perspective in pedestrian mobility planning: the case of Brasília. Souza, Bittencourt, Taco, (2018) in Transportation Research Procedia 33 1310138.

	<p>Junction 9 and A46 (Ashchurch) Transport Scheme should adhere to appropriate code of conduct and should not discriminate by race of employee.</p> <p>Operation There are no expected impacts on race upon delivery of the scheme.</p>	
Gender reassignment	<p>Design</p> <ul style="list-style-type: none"> <li>• There are no design features which impact upon those who are undergoing/have undergone gender reassignment.</li> </ul> <p>Construction</p> <ul style="list-style-type: none"> <li>• Contractors responsible for the construction of the M5 Junction 9 and A46 (Ashchurch) Transport Scheme should adhere to appropriate code of conduct and should not discriminate by gender of workers.</li> </ul> <p>Operation There are no expected impacts on gender reassignment upon delivery of the scheme.</p>	Same as service users
Marriage & civil partnership	<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>	Same as service users
Pregnancy & maternity	<p>Design</p> <ul style="list-style-type: none"> <li>• Accessible design should consider the movement of people who are pregnant or are travelling with pushchairs. Routes need to be of</li> </ul>	Same as service users



	<p>appropriate width for users travelling with pushchairs, appropriately lit and signposted, with designated crossing points.</p> <ul style="list-style-type: none"><li>• It may be assumed that accessible environments can be assessed in terms of their 'friendliness' towards pregnant and nursing mothers and parents/guardians with young children. This may manifest in measures such as seating in streets for resting and nursing, traffic safety, facilities for transporting baby buggies on buses and cycle access arrangements which permit child trailers and tricycles. In relation to the elements of this scheme, the removal of traffic volumes and speeds from the old A46 allows the street space to incorporate these types of measures. They are not intrinsic to the scheme, but the scheme creates opportunities for this.</li></ul> <p>Construction</p> <ul style="list-style-type: none"><li>• The impact of construction traffic may potentially cause severance for pedestrians including parents with young children, who are potentially more vulnerable pedestrians in terms of accessibility.</li><li>• Construction may also make it difficult for pushchair users to access the footpaths in the area, so consideration should be given to signposting alternative routes where necessary.</li><li>• Contractors responsible for the construction of the M5 Junction 9 and A46 (Ashchurch) Transport Scheme site should have a</li></ul>	
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	<p>clear policy in terms of the recruitment and employment rights of all people including a clear maternity/paternity policy.</p> <p>Operation There are no expected impacts on pregnancy and maternity upon delivery of the scheme.</p>	
Religion and/or belief	<p>Design</p> <ul style="list-style-type: none"> <li>• Consideration should be given to ensure that religious communities are not prevented from accessing places of worship or other facilities that they regularly use.</li> </ul> <p>Construction</p> <ul style="list-style-type: none"> <li>• Contractors responsible for the construction of the M5 Junction 9 and A46 (Ashchurch) Transport Scheme 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.</li> </ul> <p>Operation There are no expected impacts on religion and/or belief upon delivery of the scheme.</p>	Same as service users
Sexual orientation	<p>Design</p> <ul style="list-style-type: none"> <li>• There are no design features which may impact upon any users due to their sexual orientation.</li> </ul> <p>Construction</p> <ul style="list-style-type: none"> <li>• Contractors responsible for the construction of the M5 Junction 9 and A46 (Ashchurch) Transport Scheme should adhere to</li> </ul>	

	<p>appropriate code of conduct and should not discriminate by the sexual orientation of workers.</p> <p>Operation There are no expected impacts on sexual orientation upon delivery of the scheme.</p>	
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#### 4. Completed Actions

Set out how the proposed activity has already been amended following the equality assessment, to maximise the positive impact or minimise the negative impact:

Change	Reason for Change
Accessibility of consultation materials for the non-statutory consultation has been reviewed and amended using appropriate technology to ensure access for all.	All consultation is currently online. There were initial concerns the draft versions may not have been viewable by all residents.
Consultation accessibility for Seldom-heard groups has been considered and implemented.	To ensure the Council works as hard as possible to offer the opportunity to respond to a consultation to all residents.

#### 5. Planned Actions

Set out improvements that will be undertaken, following the equality assessment, to further maximise the positive impact or minimise the negative impact:

Potential impact (positive or negative)	Action	By when	Owner
Positive and negative	<p>Incorporating equality issues arising from consultation and the EqlA into the detailed design stage.</p> <p>Ensuring accessible design principles consider the needs</p>	Following consultation	Gloucestershire Highways / GCC

	of groups with protected characteristics.		
Positive	Appropriate traffic management plan and information provision during construction stage to consider severance and obstruction issues for those with protected characteristics	Before construction begins	Main contractor / Gloucestershire Highways / GCC
Positive	Supply of equality and diversity policy details from external contractors involved in the provision of construction and operation services.	Tendering process prior to construction	Main contractor / Gloucestershire Highways / GCC

## 6. Monitoring and review

The following processes/actions will be put in place to keep this 'activity' under review:

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 could be done through user surveys.

### Review of EIA

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

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 selection of an option, 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; and
- Race

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 relevant information is available.


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## 7. Officer / Decision-maker Sign off

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

Signature of Senior Officer	
Name of Senior Officer	Colin Chick
Date	16.03.23

Decision maker: 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.

Signature of decision maker	
Name of decision maker	Cllr David Gray
Date	16.3.23

## 8. Publication

If this document accompanies a Cabinet report or an Individual Cabinet Member (ICM) decision report it will be published, as part of the report publication process, on the GCC website. If this statement is not to be submitted with a Cabinet report or an Individual Cabinet Member (ICM) decision report, please maintain a copy for your own records that can be retrieved for internal review and also in case of future challenge.

## Appendix 1 – Service User Data

Details of service users affected by the proposed activity

Protected Characteristic	Service User Data and Information
<p>Age <i>percentage/profile of service user ages</i></p>	<p>Analysis of Census 2011 data shows that 18.8% of the population in the scheme area are aged under 16 which is in line with the regional (18.6%) and national (18.9%) proportions.</p> <p>The proportion of people aged over 65 in the scheme area is 17.2% which is lower than the South West (18.2%) but higher than the country (16.3%) as a whole.</p>
<p>Disability <i>percentage/profile of service users who have a disability</i></p>	<p>The proportion of people claiming Disability Living Allowance (DLA) in the area around the scheme is 1.6%, which is lower than the regional (2%) and national (2.3%) averages.</p> <p>14.5% of people in the area live with a Limiting Long-Term Illness, which is lower than the regional (18.7%) and national averages (17.6%).</p>
<p>Sex <i>percentage/profile of service users who are male and who are female</i></p>	<p>Just over half (50.4%) of the population in the scheme area are female, slightly lower than the regional and national averages (both 50.8%).</p>
<p>Race <i>percentage/profile of service users who are from black and minority ethnic backgrounds</i></p>	<p>According to the 2011 Census data, the majority of people living within the scheme area are white (98.0%), which is higher than both the regional (89%) and national (85%) averages.</p> <p>People identifying as mixed or multiple ethnic groups are the second largest group at 1.0%, and there are no other groups represented in the area.</p>
<p>Gender reassignment <i>percentage/profile of service users who have indicated they are transgender</i></p>	<p>There is currently no information available regarding the proportion of people who have undergone or going through the process of gender reassignment.</p>
<p>Marriage &amp; civil partnership</p>	<p>Married couples make up 55.6% of the population around the scheme area, and 0.3% of the population are in civil</p>

<p><i>percentage/profile of service users who are married or in a civil partnership</i></p>	<p>partnerships. This is higher than in England overall, with 46.6% of the country's population in a married couple and 0.2% in a civil partnership.</p>
<p>Pregnancy &amp; maternity <i>percentage/profile of service users who are female and who are pregnant or on a maternity leave</i></p>	<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 Total Fertility Rate.</p> <p>Gloucester and Tewkesbury had a combined 2,667 live births in 2019.</p> <p>The Total Fertility Rate is higher in both Gloucester (1.89) and Tewkesbury (1.94) than the South West (1.66) and England overall (1.7).</p>
<p>Religion and/or belief <i>percentage/profile of service users religious beliefs</i></p>	<p>The majority of the population within the scheme area are Christian (66.5%), and there are a further 25.4% who describe themselves as having no religion. This is comparable to the South West as a whole, where 60.3% of the population identify as Christian and 25.5% describe themselves as having no religion. At the national level, 59.4% identify as Christian and 24.7% describe themselves as having no religion.</p> <p>The remaining population in the scheme area identify as follows: 0.3% Muslim; 0.3% other religion, 0.2% Buddhist; 0.1% Hindu and 0.1% Jewish.</p>
<p>Sexual orientation <i>percentage/profile of service users who are lesbian, gay, bisexual, heterosexual</i></p>	<p>Data from the South West region (this is the lowest level of data available) shows that 95.1% of people in the South West identify as straight, compared to 94.4% in England overall. The South West has comparable proportions of people identifying as gay, bisexual and other sexual orientations to national figures.</p>

## Appendix 2 – GCC Workforce Data

Below are the details of the most recent statistics collected regarding Equality Impact characteristics of GCC workforce, located in the GCC workforce diversity reports, on the GCC website. These are not available broken down by the potential workforce that may use the travel area around the M5J9, or might be affected as detailed above. Therefore these are the MAXIMUM possible affected workforce numbers, rather than those segregated by geographical area.

Protected Characteristic	Total number of GCC staff affected:
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Age	16-25 – 165 56+ - 418
Disability	160
Sex	Male: 533 Female: 1395 Non-conforming: 6
Race	BAME: 109
Gender reassignment	n/a
Marriage & civil partnership	n/a
Pregnancy & maternity	n/a
Religion and/or belief	n/a
Sexual orientation	LGBT+: 150

The GCC project team have been working to develop strategies for improving engagement with seldom heard groups around infrastructure consultation. Our consultants have developed a set of strategies which will be deployed in support of the non-statutory consultation. Several different groups have been identified that are not often heard from during consultations, and actions we will undertake to try and engage with these groups. These are outlined below:

Seldom Heard groups	Engagement activities
Commuters travelling through the scheme area Seasonal road users	Online information widely publicised through local businesses and media. Variable Message Signs (VMS) and A-frames
Time poor	Online information including recorded content available, including virtual event recordings. Online information is accessible for all screen sizes and resolutions. Postcard drops to local residents and businesses. Updates and engagement via social media. Design of the feedback survey will be concise and easy to use so people can leave feedback in a short time.
Those unable to access the internet	Option to request hard copy consultation materials by phone or pick up a hard copy of the brochure and survey at Cheltenham and Tewkesbury Libraries.



	<p>Ability to respond to consultation by post or over the phone via the GCC customer contact centre - set up a dedicated line who can input the survey if required.</p> <p>Postcard drops to local residents and businesses.</p> <p>Posters displayed in community facilities.</p>
Disabled groups	<p>Contact representatives of local disability groups.</p> <p>Option to request hard copy consultation materials by phone.</p> <p>Ability to respond to consultation by post or over the phone via the GCC customer contact centre.</p> <p>Option to request documents in accessible formats.</p> <p>Posters displayed in community facilities.</p>
Black and Minority Ethnic (BAME) groups	<p>Contact representatives of local community groups.</p> <p>Option to request hard copy consultation materials by phone.</p> <p>Ability to respond to consultation by post or over the phone via the GCC customer contact centre (details above).</p> <p>Postcard drops to local residents and businesses and poster displayed in community facilities.</p> <p>Updates and engagement via social media.</p>
Young people	<p>Online information including recorded content available, including virtual event recordings.</p> <p>Design of the feedback survey will be concise and easy to use so people can leave feedback in a short time.</p> <p>Updates and engagement via social media.</p>