

**M54 to M6 Link Road**

**TR010054**

**Volume 6**

**6.7 Equality Impact Assessment**

Regulation 5 (2)(q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009

January 2020

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning  
(Applications: Prescribed Forms and  
Procedure) Regulations 2009**

**M54 to M6 Link Road  
Development Consent Order 202[ ]**

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**6.7 Equality Impact Assessment**

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<b>Regulation Number</b>	Regulation 5(2)(q)
<b>Planning Inspectorate Scheme Reference</b>	TR010054
<b>Application Document Reference</b>	6.7
<b>Author</b>	M54 to M6 Link Road Project Team and Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
1	January 2020	DCO Application

EQUALITY IMPACT SCREENING AND ASSESSMENT			
<b>Name of Practice/Policy</b>	M54 to M6 Link Road	<b>Proposed or Current</b>	Proposed
<b>Person Completing the Assessment</b>	Rob Ramshaw – AECOM (consultant)		
<b>Directorate</b>	Major Projects (RIP Midlands)		
<b>Date</b> December 2019	<b>Eql Register Ref No:</b> <b>(Obtained from the EDI Advocate)</b>	MP20	

**A: In this section, outline the aims, purpose, desired benefits and expected outcomes of the practice/policy, identifying the customers, staff or stakeholders involved or affected.**

The Scheme would provide a strategic link between the M54 Junction 1 and M6 Junction 11. From south to north the main components of the Scheme include:

- Replacement of the existing M54 Junction 1 with free-flow slip roads between the new link road and the M54. This would allow the free-flow of traffic between the M54 and the new link road in both directions and maintain connectivity with the existing local road network, via three new roundabouts.
- Construction of a new dual carriageway between M54 Junction 1 and the M6 Junction 11 which will be a new bypass to divert traffic away from the existing A460 and villages along this route. The alignment of the new dual carriageway/bypass would be located to the east of the existing A460 and the villages of Featherstone, Hilton and Shareshill and west of Hilton Hall.
- Dark Lane would be stopped-up between the final property and the junction with Hilton Lane so that it is no longer a through-road.
- The realignment of Hilton Lane on a bridge over the mainline of the Scheme to retain access to severed land to the east of the Scheme. The route of the new link road would then continue north to the east of Brookfield Farm to link into the M6 Junction 11.
- Provision of an accommodation bridge (a bridge to connect parcels of private land) and access track across the mainline of the Scheme to retain access to severed land to the east of the Scheme. This bridge is also to have a bridleway diverted across it, therefore it has been

designed to accommodate the requirements of Non-Motorised Users. The route of the new link road would then continue north to the east of Brookfield Farm to link to the M6 Junction 11.

- Enlargement of the M6 Junction 11 signalised roundabout to accommodate a connection to the new link road and realign existing connections with the A460 and M6. Two replacement bridges would be required over the M6 to provide an increase in capacity from two lanes to four lanes of traffic on the roundabout. This work would raise the height of the junction by approximately 1.5 m. New signalised crossing facilities would be provided to enable safer use of the junction by pedestrians (to include disability compliant features, i.e. tactile crossings and audible/visual indicators where appropriate)

The primary objectives of the Scheme are to:

- Relieve traffic congestion on the A460, A449 and A5, this will provide more reliable journey times.
- Keep the right traffic on the right roads and improve safety by separating local community traffic from long distance and business traffic.
- Reduce volumes of through-traffic in villages, improving local community access.
- Support local economic growth for Telford, Shrewsbury, Wolverhampton, Cannock and Tamworth by improving traffic flow and enhancing access to east-west and north-south routes.

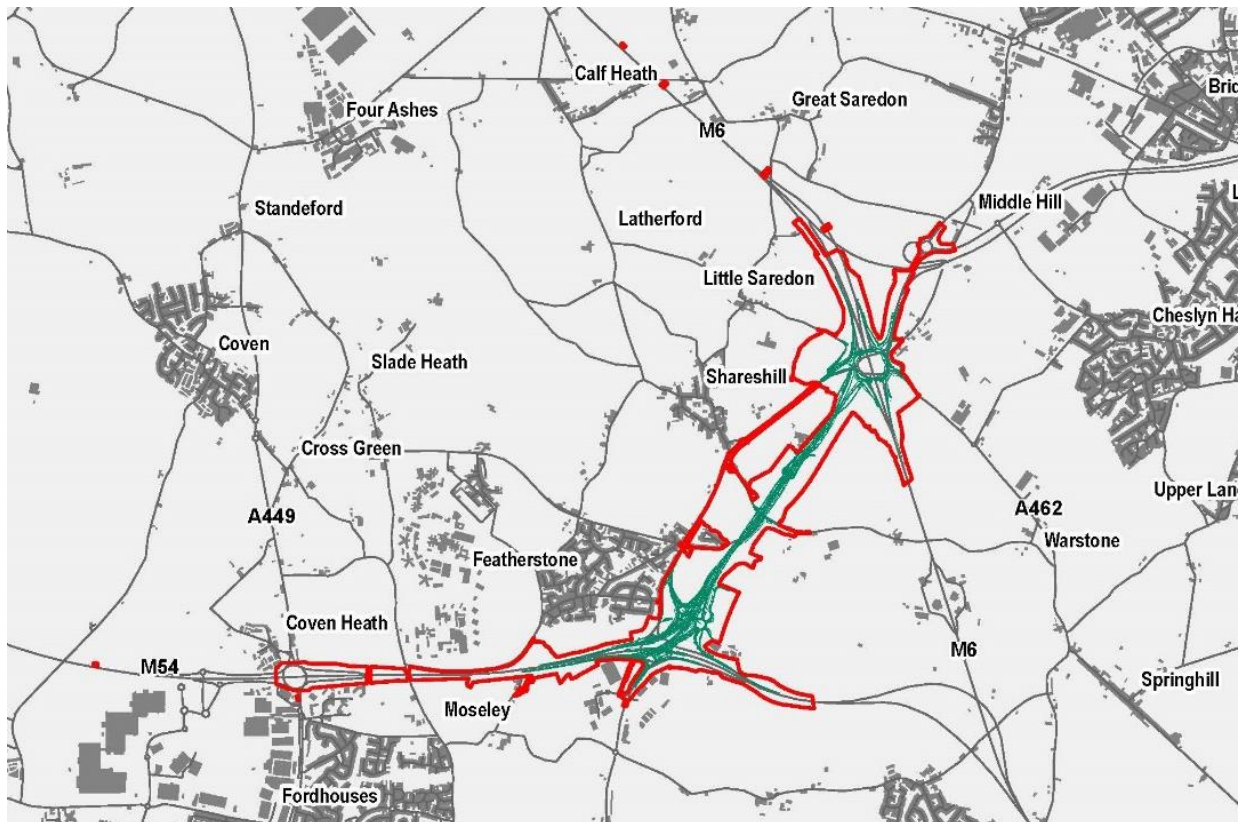
Subject to securing a DCO (submitted on 30/01/2020), preliminary works are planned to start in late 2021 with the main construction works following in early 2022. The Scheme is due to fully open to traffic in 2024.

Key Stakeholders include:

- Staffordshire County Council and Councillors
- South Staffordshire Council and Councillors (planning authority)
- City of Wolverhampton Council and Councillors
- Highways England Area 9 Asset Team
- Midlands Expressway Limited
- Statutory Bodies
- Local action groups
- Local enterprise groups
- Large local businesses
- Gavin Williamson MP

- Featherstone and Brinsford Parish Council
- Hilton Parish Council
- Shareshill Parish Council
- Local Parish Councils
- Local residents
- Property residents in Hilton
- Affected landowners
- Users of fishing clubs, livery facilities and shooting club

The customers affected are strategic road users and local road users including Pedestrians and Cyclists



<b>B: SCREENING (Stage 1)</b>  <b>Questions considered to establish impacts from the outset for new or changing policies/practices</b>	Sex	Religion or Belief	Age	Disability	Race	Sexual Orientation	Gender Re-assignment (include transsexual and	Pregnancy & Maternity	Marriage & Civil Partnership
1: Is there any indication or evidence that different groups have different needs, experiences, issues or priorities in relation to the practice/policy?	N	N	Y	Y	N	N	N	N	N
2: Is there evidence or an indication of higher or lower uptake by different groups?	N	N	N	N	N	N	N	N	N
3: Do people have different levels of access? Are there social or physical barriers to participation (e.g. language, format, physical access)?	N	N	N	N	N	N	N	N	N
4: Is there an opportunity to advance equality or foster good relations by altering the policy/practice?	N	N	Y	Y	N	N	N	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?	N	N	N	N	N	N	N	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	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	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).	N	N	N	N	N	N	N	N	N



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

This assessment has been carried out using Highways England's Equality, Diversity and Inclusion sifting Tool (EDIT) and available data from the 2011 census to further understand the demographics of the region. We have also used data collected from the public consultations held in 2014/15, 2017 and 2019. Using these data sources is considered enough evidence to provide a robust screening assessment in line with equality duty.

The EDIT tool uses hot spot mapping in an initial sift to identify whether it is likely that Equality, Diversity and Inclusion issues are likely to be a factor in the effective delivery of any scheme. At this stage the tool recommends that these issues may be a factor in the effective delivery of the M54 to M6 Link scheme and therefore further steps will be conducted. The overall EDIT percentage that was generated was 49% indicating Equality, diversity and inclusion issues are likely to be a factor in the effective delivery of the scheme.

The EDIT will be revisited and refined in conjunction with the EqIA in subsequent stages of the scheme. To further investigate the impact on specific groups as mentioned in Section B of this assessment 2011 census data has been analysed to give an understanding of the potential impacts of the scheme given the known demographics of the area. Most of the proposed scheme's impacts are likely to be experienced in the ward of Featherstone and Shareshill. Therefore, a socio-demographic overview of this particular area has been reviewed to provide a background and support with the actions identified to meet equality objectives.

Baseline Socio-demographic Data

The Featherstone and Shareshill Ward incorporates the parish of Hilton. The M6 motorway runs along the border of this ward whilst both the M54 motorway and A460 pass through the ward. The ward is the 6th largest in South Staffordshire and is home to 5,741 people. It is predominantly a rural area surrounding the town of Featherstone and the villages of Shareshill and Hilton. The area is also known for the presence of HMP Featherstone, HMP Oakwood, Brinsford Young Offenders Institute and Hilton Hall and Park.

Table 1 (below) provides an overview of the socio-demographic profile of the study area in relation to groups with protected characteristics and other groups associated with equalities issues.



**Table 1 - Socio-demographic overview**

Protected Characteristic	Study Area
<b>Ethnicity and Nationality</b>	<p>The population of Featherstone and Shareshill has increased by 1.9% between 2001 and 2011, significantly higher than the national average (7.2%).</p> <p>The Census 2011 indicated the Ward has a predominantly white population (89.5%) lower than the rate for South Staffordshire (95.9%) but higher than the rate for England and Wales (81.9%). The remaining 10.5% are composed of ethnic minorities (Mixed, Black and Asian Minority).</p> <p>The number of Asian / Asian British residents has increased in the ward from 97 to 248. The number of ethnic minority populations have increased by over 100% between 2001 and 2011.</p>
<b>Gender</b>	56% of the population is male and 44% of the population is female (Census 2011).
<b>Age</b>	<p>23.5% of people are 19 years old or under, 29.8% are between 20 and 39 years old, 28.9% are between 40 and 59 years old and the remaining 17.8% are over 60 years old.</p> <p>In comparison to national figures there is a lower proportion (10.5% less) of 60+ aged people, which is balanced by an increased in 20-39 (9.3% more) and 40-59 year olds. Those 19 and younger and between 40 and 59 have remained broadly similar.</p>
<b>Economic Activity</b>	No information available, however as the scheme is not expected to have any specific impact based on this protected characteristic no further information is required.
<b>Adult Skills</b>	Within the Ward of Featherstone and Shareshill there are approximately 25.4% of the population considered to have no skills, there are 36.9% who have qualifications up to GCSE level / NVQ Level 1. Those with higher qualifications total 29.1%.
<b>Household Composition</b>	The Ward comprises 1.989 households with large variation in house compositions. Single person households represent 24.8% of households in the ward, of this 9.5% represent people aged 65 and over.

	Of the total number of households in the ward, 5.7% are lone parents with dependent children, whereas there are 3.6% with non-dependent children.
<b>Housing</b>	<p>Average house prices in June 2016 for the Featherstone and Shareshill Ward was £155,650 compared to a District average of £231,625.</p> <p>Affordability data (lower quartile house prices) have a District average of £156,000 with the Featherstone and Shareshill ward with an average of £123,00.</p>
<b>Disability, Health and Care</b>	In Featherstone and Shareshill, 7.3% of the wards population report disabilities that significantly affect their day-to-day activities. An additional 9.3% stated their disability or health issue had a minor effect on their day-to-day activities.
<b>Married and Civil Partnership</b>	No information available, however as the scheme is not expected to have any specific impact based on this protected characteristic no further information is required.
<b>Religion and Belief</b>	The 2011 Census, 72.6% of residents in the Featherstone and Shareshill stated that they have a religion. Of this number the majority was Christian (67.4%). The remaining 5.2% is made up of Muslim, Hindu, Sikh and other religions. 20.9% stated they had no religion.
<b>Deprived and Disadvantaged Communities</b>	The Index of Multiple Deprivation (IMD) highlights that the Featherstone and Shareshill ward is amongst the 30% least deprived neighbourhoods in the country.
<b>Health Inequalities</b>	<p>The 2011 Census highlighted 80.9% of residents in Featherstone and Shareshill indicated their health was either good or very good.</p> <p>Life expectancy for residents of Featherstone and Shareshill is currently 80.6 years for Males and 83.9 for females.</p>
<b>Asylum Seekers/Refugees</b>	No information available, however as the scheme is not expected to have any specific impact on asylum seekers or refugees no further information is required.
<b>Car Ownership</b>	15.7% of households in Featherstone and Shareshill have no access to a car or van, which is lower than the wider South Staffordshire at 13.2%. However this is significantly lower than the national average compared to the national average of 26% across England.

The data in Table 1 has been collated based on the current available information for the area. This data will be further reviewed and updated as Stage 3 progresses.

**Data within Table 1 was collated from:**

- 2011 Census Data
- South Staffordshire Council – Locality Profile 2017
- South Staffordshire Ward Profile - Featherstone and Shareshill Spring 2013.

**Confirmation – State whether a full equality impact assessment is required**

<b>Yes</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 a sound equality decision.</li> </ul> <p><b>Proceed to Sections D – H</b></p>
<b>No</b>		<ul style="list-style-type: none"> <li>• The policy/practice is robust in terms of equality.</li> <li>• The impact on different groups is considered to be ‘neutral’ with no risk of discrimination and any minor impacts can be justified.</li> </ul> <p><b>Proceed to Section E1 and Sign-off at H</b></p>

**D: ASSESSMENT (Stage 2)**

**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
Sex			✓	Scheme will not have specific impact based on gender.
Religion or Belief			✓	Scheme will not have specific impact based on any religion/ or access to

				any religious venues and events.
Age	✓			<p>Local population has lower proportion of 60+ age people, compared to national average. Therefore, higher proportion of people working in economically active group who will all likely to benefit from transport improvements.</p> <p>Local community groups, including primary schools, high schools and family health centres have been identified and were invited to a pre-consultation engagement forum on the 15.5.19, Leaflets/letters were sent inviting them to take part in the consultation to ensure their views are covered. No representatives of local groups representing this characteristic attended. Disruption to local routes is likely to be minimised during construction as the majority of work is offline. The contractor will appoint a Community Liaison officer to communicate any impacts on the local community and to</p>

				ensure that mobility requirements are considered in the design of traffic management
Disability	✓			Reduction on traffic (local road) will improve accessibility for people with mental and physical disabilities. Invites were sent inviting local nursing and care services to the pre-consultation engagement forum on 15.5.19. Letters were sent to people who assist immobile/home bound people, to ensure their views are captured. No representatives of local groups representing this characteristic attended. Disruption to local routes is likely to be minimised during construction as the majority of work is offline. The contractor will appoint a Community Liaison officer to communicate any impacts on the local community and to ensure that mobility requirements are considered in the design of traffic management
Race			✓	

				Scheme will not have any specific impact based on these protected characteristics. However, consultation events/ community forums will allow these groups to engage with local community to shape the scheme.
Sexual Orientation			✓	
Gender Reassignment (Incl. Transsexual and Transgender)			✓	
Pregnancy & Maternity			✓	
Marriage & Civil Partnership			✓	

**Potential Risks Identified – Including insufficient information to make robust decisions**

<b>No</b>	✓	
<b>Yes (Mitigating action shown in Section F)</b>		<b>Identified Risks:</b> <ul style="list-style-type: none"> <li>• N/A</li> </ul>

**E: Options: The rationale behind the decision reached.**

<b>E1: Proceed with the policy/practice because:</b> <ul style="list-style-type: none"> <li>○ the decision can be justified (At screening or in Section D)</li> <li>○ there is no reasonable alternative</li> <li>○ the Senior Reporting Officer/Programme Delivery Director is content to defend any potential challenge and is willing to sign-off in Section H</li> </ul>	✓
<b>E2: Make adjustments</b> <ul style="list-style-type: none"> <li>○ to demonstrate how activities will lead to a fair outcome</li> </ul> <p>(Ensure further evidence is gathered to ensure any barriers are removed and referenced in Sections F and G)</p>	
<b>E3: Withdraw it because there is obvious detriment</b> <p><b>(Sign Off in Section H)</b></p>	

**F: Description of additional evidence, research and consultation undertaken, required, ongoing or captured. This is to ascertain how the policy or practice will advance equality, foster good relations and/or eliminate discrimination. Reference the evidence sources**

The paragraphs below set out the methodology used in the previous non-statutory consultations and how this has been developed to design the statutory consultation to engage the local community as effectively as possible.

Dec '14 – Jan '15 consultation

As part of the non-statutory public consultation on proposed route options held between 5 December 2014 and 30 January 2015, 3 public consultation exhibitions were held at 2 different venues - Shareshill Village Hall and Featherstone & Hilton Community Centre. The venues were selected in the vicinity of the proposed scheme and had been used for the previous exhibitions in 2006. These exhibitions were intended to reach a wide audience with particular focus on the villages of Shareshill and Featherstone and road users of the A460. Accessibility was a key consideration in the selection of venues. Both had ample car parks, nearby bus stops and disabled access which was identified in the Buildings Accessibility Checklist.

Following these exhibitions, Cheslyn Hay and Essington Parish Councils requested exhibitions in their parishes to allow residents to view the scheme options in further detail. We responded to this by organising two further exhibitions where boards were manned for part of the session and then left for the public to peruse at their leisure. Leaflets and questionnaires were left at these venues for the public to take away. The below table summarises the details of these additional exhibitions:

Sept '17 – Oct '17 Consultation

In response to the Dec '14 to Jan '15 consultation, new routes were developed. These were consulted on in another round of non-statutory public consultation which took place between 15 September and 13 October 2017 (4 weeks).

We used a range of methods to ensure we reached our stakeholders as well as harder to reach groups within the vicinity of the scheme proposals. Our public events were held at various locations, including the smaller villages.

For those unable to attend the exhibitions, all information was made available

online and a printed version of the brochure and questionnaire was available via the scheme website, on request via the Highways England customer contact centre. Details



of the Highways England HAILs team were provided in the consultation brochure, for people to contact if they had difficulty using the information.

The exhibitions were advertised in the following ways:

- On the Highways England websites
- The local press, local radio and local TV.
- 600 Letters were sent to all properties within 100m of the 3 route options.
- Meetings were arranged to discuss the scheme with directly affected landowners
- Leaflets and posters were delivered to centralized locations
- Social media – Twitter
- Presentations of the proposed scheme carried out over 3 dates to local councillors

These methods were intended to reach a wide audience with particular focus on members of the public and road users of the A460.

Meetings were also held with landowners who may be directly affected by the proposed scheme routes. Presentations with key stakeholders were also given before the exhibitions took place. This included Parish, District and County councils that would be directly affected by the proposed routes. All were offered the opportunity to speak with the projects team and have any questions answered based on the responses received from the previous rounds of consultation, stakeholder meetings were scheduled.

In addition to these meetings and exhibitions the project team was also available through a live web chat on the day following the final consultation event between 11am and 2pm. This webchat was advertised on the Highways England website and emails were sent to all stakeholders whom we had an email address for Shropshire Star and Radio Shropshire were also advised of the webchat and were requested to advertise it. This gave the public stakeholders the opportunity to ask any further questions about the three route options before the consultation period ended. No members of public interacted with the webchat and this is now not considered to be an effective means of engaging the local community for the forthcoming statutory consultation event.

At the exit of the exhibitions, we asked attendees to complete a short survey to understand their level of satisfaction with the exhibition. The main comments received related to the extent of publicity for the consultation not being wide reaching enough.

The Communications Plan stated that:

*The demographics of the area do not indicate any hard to reach groups. A variety of communication channels will be used including leaflets, website, radio/TV coverage to publicise the PIEs and the project will manage specific issues on a case by case basis; such as rural communities without car transport or language and cultural barriers. The*

*team will be participating in and utilising Parish Council meetings as a route to the wider community.*

Members of the public and road users should benefit from the consultation by gaining an understanding of the scheme, whilst having the opportunity to comment through our questionnaire. The consultation will help to inform Highways England in the selection of a preferred route. The responses collated as part of the consultation will form the basis of subsequent consultation reports.

The interim results of the non-statutory consultation will help identify specific equality groups, allowing us to be more responsive to the different needs of the area but also how we can improve our consultations going forward. We have made contact with equality and diversity leads from the host local authority affected (South Staffordshire District Council "SSDC") and will work with them going forward to establish key contacts for any specific protected characteristic groups. During discussions relating to the production of the SoCC, SSDC did not identify any specific EDI groups within their district that they consider would need to be targeted as part of future consultation events. We held a forum (15<sup>th</sup> May 2019) with local community groups to communicate the scheme proposals and to seek feedback that could be used in the detailed scheme development to address specific issues raised. There were no particular outcomes of these forums, however they were attended by local businesses and environmental interest groups who have participated in the consultation.

Early engagement with these groups encouraged participation and ensured that their views, local knowledge and requirements were considered from the initial design stages. By continuing to develop and evolve stakeholder relationships, the Project team aim to minimise anxiety and resulting objections to the project, based on mis-information and poor consultation.

#### Post-Preferred Route Announcement PIEs

Following the Preferred Route Announcement (PRA) in September 2018, a number of Public Information Events (PIEs) were held to publicise the Preferred Route. These events were held in Essington, Shareshill and Featherstone, however due to available timescales for the venues, the Essington events were held first.

#### Statutory Consultation in 2019

The scheme undertook a statutory consultation between 24/05/19 and 05/07/19 to seek views on the developed preferred route prior to finalising and submitting a DCO application in early 2020.

The strategy for the 2019 statutory consultation is essentially the same as the 2017 consultation. The same venues were used as the 2017 consultation with the Featherstone and Shareshill events being held first. The only exception to the strategy is that the area for distribution of leaflets publicising the events has been widened significantly and Facebook advertising was also used to provide a wider publicity of the consultation.

The proposed consultation details have been set out in the Statement of Community Consultation (SoCC [https://highwaysengland.citizenspace.com/he/m54-to-m6-link-road/supporting\\_documents/M54%20to%20M6%20Link%20Road%20%20Statement%20of%20Community%20Consultation%20%20May%202019.pdf](https://highwaysengland.citizenspace.com/he/m54-to-m6-link-road/supporting_documents/M54%20to%20M6%20Link%20Road%20%20Statement%20of%20Community%20Consultation%20%20May%202019.pdf) ), which is required under Section 47 (1) of the Planning Act 2008. This has been developed in consultation with the host authorities (Staffordshire County Council, South Staffordshire District Council and Wolverhampton City Council). Their comments have been addressed in the SoCC and no issues relating to equality or diversity have been raised

When selecting the venues for the non-statutory consultation exercise we looked at its location within the community and whether the venue had suitable disabled access, sufficient parking and facilities are easy to access via public transport and we completed Building Accessibility Checklists for the venues to confirm that they were accessible for all (these can be made available on request). Further details on the planning for the statutory consultation and outcomes are reported in the Consultation Report {TR010054/APP/5.1}.

**G: Monitoring (Stage 3)**

**Detail how you will monitor the actual outcomes of the policy/practice throughout the project lifecycle and explain how/when you will review them.**

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

Monitoring Action	By Whom	By When
Update EQIA	Project Team	PCF Stage 4

**H: Sign-off by Highways England Senior Responsible Owner (SRO), or for Major Project schemes, the Programme Delivery Director (PDD), (or the Programme Internal Sponsor or Project Sponsor if the PDD has delegated sign-off).**

<b>Name</b>	<b>Anthony Johnson</b>	<b>Date</b>	<b>January 2020</b>
<b>Job Title</b>	<b>Programme Delivery Director</b>		