

A417 Missing Link  
TR010056

7.8 Equality Impact Assessment  
(Rev 1)

Planning Act 2008

APFP Regulation 5(2)(q)  
Infrastructure Planning (Applications: Prescribed Forms and  
Procedure) Regulations 2009

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

**A417 Missing Link**

Development Consent Order 202[x]

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**Equality Impact Assessment (Rev 1)**

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# 1 Equality Impact Screening and Assessment

- 1.1.1 This section incorporates the assessment of equality effects of the scheme at preliminary design, using Highways England's standard Equality Impact Assessment (EqIA), Screening Analysis and Monitoring template<sup>1</sup>. The assessment considers how the scheme could directly impact and contribute to equality effects for Protected Characteristics Groups (PCGs).

## Equality Impact Assessment (EqIA)

### Screening Analysis and Monitoring Template

Before carrying out an Equality Impact Screening or Assessment familiarise yourself with Highways England's guidance on the subject. The Equality Impact Screening and Assessment procedure applies in terms of employment and the delivery of services.

The term 'Policy/Practice' is used throughout the document. This applies to all policy/practice/project/schemes/building considerations/initiatives/guidance and functions across all areas of our business.

#### EQUALITY IMPACT SCREENING AND ASSESSMENT

<b>Name of Practice/Policy</b>	<b>A417 The Missing Link</b>	<b>Proposed or Current</b>	<b>Proposed</b>
<b>Person Completing the Assessment</b>	Rowena Ekermawi (RE) Arup Tabitha Kennedy (TK) Arup		
<b>Directorate</b>	Major Projects (MP)		
<b>Date</b>	<b>EqI Register Ref No:</b>	<b>MPS86</b>	
<b>04/03/2020</b>	<b>(Obtained from the EDI Advocate)</b>		

**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 A417/A419 is a strategic route between Gloucester and Swindon that provides an important link connecting the West Midlands and the south of England. The route is an alternative to the M5/M4 route via Bristol. The section of the A417 near Birdlip, known as the 'Missing Link', forms the only section of single carriageway along the route and is located in the Cotswolds Area of Outstanding Natural Beauty (AONB).

In 2014, the Department for Transport (DfT) announced its five year investment programme for making improvements to the Strategic Road Network across England. This scheme is one of more than 100 schemes identified as part of the first *Road Investment Strategy* (RIS1) 2015-2020<sup>2</sup>. Funding for delivery of the scheme has been confirmed within the second *Road Investment Strategy* (RIS2)<sup>3</sup>, which covers the period between 2020 and 2025 and was published on 11 March 2020.

The scheme would upgrade this section of the A417 to dual carriageway, in a way that is sensitive to the surrounding AONB, help unlock Gloucestershire's potential for growth, support regional plans for more homes and jobs, and improve life in local communities.

### Programme

The EqIA forms part of the Development Consent Order (DCO) Application submitted to the Planning Inspectorate (PINS) in spring 2021 in accordance with the *Planning Act 2008*. PINS will consider, on behalf of the Secretary of State (SoS), whether the DCO Application should be accepted for examination. PINS have a period of up to 28 days to consider the acceptance of the DCO Application.

The documents accompanying the DCO Application are publicly available on the Planning Inspectorate's website, and consultees are able to submit comments to PINS. These comments are then be considered as part of the examination of the DCO Application.

Following examination, PINS will make a recommendation to the SoS, who will then decide whether to grant a DCO.

If the DCO is granted, construction is expected to start in early 2023 and the scheme is expected to be open to traffic in 2026, however, Highways England may be in a position to commence preparatory works in late 2022, subject to the consents and approvals set out in the Consents and Agreements Position Statement (Document Reference 7.2) having been obtained.

The construction programme would be finalised by the contractor in advance of the works. The duration of the construction works is currently estimated to be at least 33 months, commencing nine months after the start of preparatory works, giving an overall construction period of 42 months.

The scheme is currently at Highways England Project Control Framework (PCF) Stage 4.

### Scheme vision and objectives

Through proactive engagement with a number of groups and organisations, we've agreed a landscape-led scheme vision statement: "We want to create a landscape-led highways improvement scheme that will deliver a safe and resilient free flowing road while conserving and enhancing the special character of the Cotswolds AONB; reconnecting landscape and ecology; bringing about landscape, wildlife and heritage benefits, including enhanced visitors' enjoyment of the area; improving local communities' quality of life; and contributing to the health of the economy and local businesses.

In order to deliver this vision, the following scheme objectives have been set:

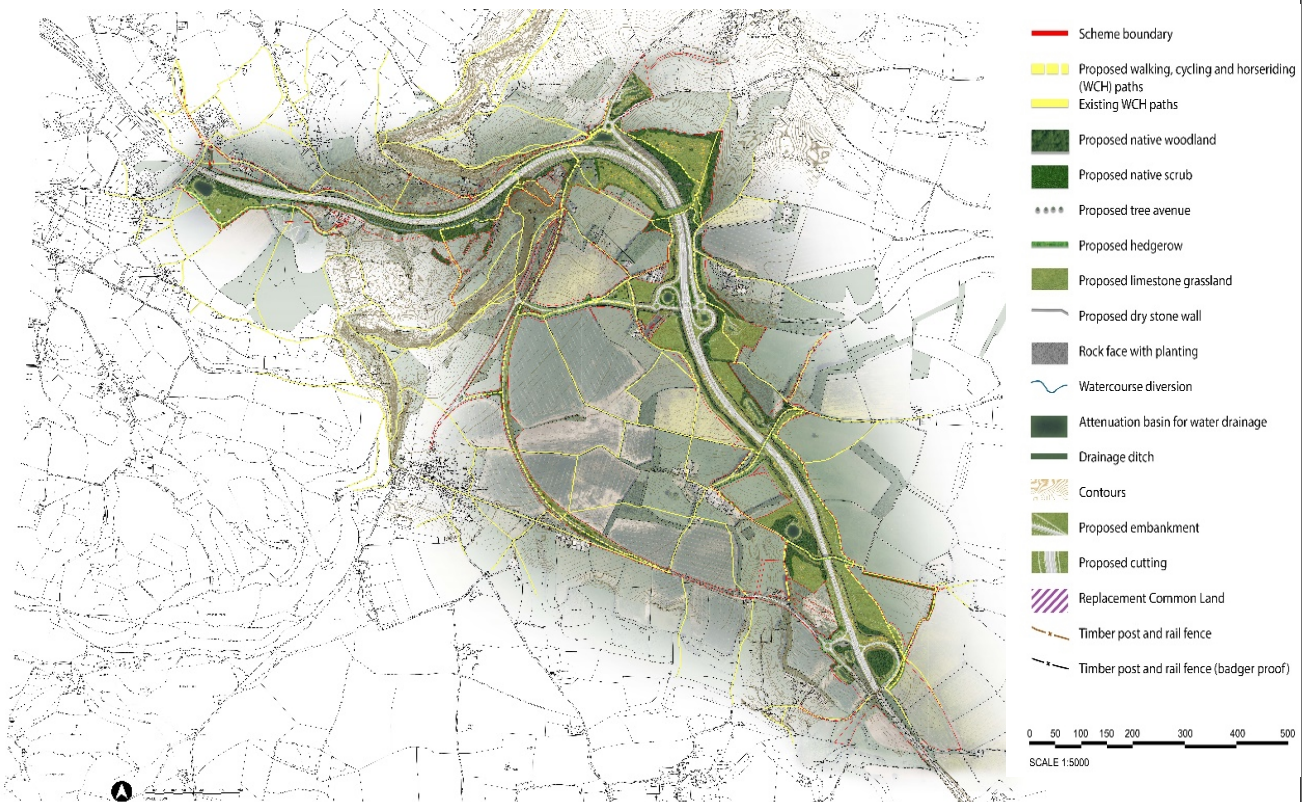
- **Safe, resilient and efficient network:** to create a high-quality resilient route that helps to resolve traffic problems and achieves reliable journey times between the Thames Valley and West Midlands as well as providing appropriate connections to the local road network.
- **Improving the natural environment and heritage:** to maximise opportunities for landscape, historic and natural environment enhancement within the Cotswolds AONB and to reduce negative impacts of the proposed scheme on the surrounding environment.
- **Community & access:** to enhance the quality of life for local residents and visitors by reducing traffic intrusion and pollution, discouraging rat-running through villages and substantially improving public access for the enjoyment of the countryside.

- Supporting economic growth: to facilitate economic growth, benefit local businesses and improve prosperity by the provision of a free-flowing road giving people more reliable local and strategic journeys.

### Scheme description

The scheme would provide 3.4 miles (5.5 km) of new, rural all-purpose dual carriageway for the A417. The new dual carriageway would connect the Existing A417 Brockworth bypass with the existing dual carriageway A417 south of Cowley. The new dual carriageway would be completed in line with current trunk road design standards. The section to the west of the existing Air Balloon roundabout would follow the Existing A417 corridor, but to the south and east of the Air Balloon roundabout, the corridor would be offline, away from the existing road corridor.

The scheme would include a new crossing near Emma's Grove for walkers, cyclists and horse riders including disabled users, which would accommodate the Cotswold Way National Trail. Figure 5 illustrates the accessibility of the scheme. A new junction would be incorporated at Shab Hill, providing a link from the A417 to the A436 (towards the A40 and Oxford), and to the B4070 (for Birdlip and other local destinations).



**Figure 1 Accessible Scheme Map**

A new 37m wide multi-purpose crossing is also proposed to provide essential mitigation for bats, as well as enhance ecology and landscape integration. The public would also further benefit as the crossing would accommodate the Gloucestershire Way and provide an improved visitor experience.

A new junction would be included near Cowley, replacing the existing Cowley roundabout, making use of an existing underbridge to provide access to local destinations. The use of the existing underbridge would allow for all directions of travel to be made.

The Existing A417 between the existing 'Air Balloon roundabout' and 'Cowley roundabout' would be detrunked for its entire length. Some lengths of the existing road would be

converted into a route for walkers, cyclists and horse riders including disabled users. Other sections would be retained as lower-class public roads, maintaining local access for residents. Some of the route would provide common land.

See General Arrangement and Section Plans (Document Reference 2.6) for a plan of the scheme. The scheme is currently at preliminary design.

#### Project management assurance – compliance with the Public Sector Equality Duty (PSED)

Whilst working on the preliminary design the scheme has given due regard to the PSED in relation to the management of the workforce and in the scheme design process. Evidence of this includes:

- Equality, Diversity and Inclusion (EDI) training including an e-learning module on unconscious bias, EDI information materials available for all on SharePoint, and the scheme's collaborative platform for document storage and information.
- An EDI "onboarding pack" is being developed and will be shared with the supply chain which outlines our commitments and expectation around diversity and inclusion in collaboration with other Highways England schemes.
- Principles of Inclusive Design e-learning course undertaken by all members of staff.
- All A417 staff have completed the Respect at Work module.
- Use of the Design Manual for Roads and Bridges (DMRB) guidance, with particular reference to Vol. 0 author's guidance which contains advice on the PSED.
- Regular meetings/communication with Highways England's EDI advocate for major projects.
- Continued interaction between the project engagement team and the equalities lead.

All the above actions have been incorporated into an Inclusion Action Plan for the scheme which has been reviewed and updated on a quarterly basis and submitted as evidence to support Highways England's reporting requirements with regard to equalities.

#### Customers, staff or stakeholders involved or affected

##### *Customers*

The main customers for the scheme are as follows:

- Road users along the route and on local roads experiencing impacts, for example improvements to road infrastructure to reduce journey times.
- Users of local roads and travel routes without vehicles experiencing impacts, including walkers, wheelchair users, cyclists and horse riders.

##### *Staff*

This includes staff involved in the construction and management of the scheme. The construction stage presents a considerable employment opportunity in the area and can be used to maximise the social value of the scheme.

##### *Stakeholders*

Includes local authorities, public services, local bodies and environmental agencies consulted as part of the scheme's development.



<b>B: SCREENING (Stage 1)</b>									
<b>Questions considered to establish impacts from the outset for new or changing policies/practices</b>	<b>Sex</b>	<b>Religion or Belief</b>	<b>Age</b>	<b>Disability</b>	<b>Race</b>	<b>Sexual Orientation</b>	<b>Gender Re-assignment (include transsexual and transgender)</b>	<b>Pregnancy &amp; Maternity</b>	<b>Marriage &amp; Civil Partnership</b>
1: Is there any indication or evidence that different groups have different needs, experiences, issues or priorities in relation to the practice/policy?	Y	N	Y	Y	N	N	N	Y	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	Y	Y	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	Y	Y	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?	Y	N	Y	Y	N	N	N	Y	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	N	Y	Y	N	N	N	Y	N



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

### **Equalities Baseline**

#### Introduction

The equalities baseline provides a profile of residents living in the area surrounding the scheme. It draws upon the Census 2011 and other datasets from the Office for National Statistics (ONS) to identify, in particular, the level and distribution of people with protected characteristics living within the area.

#### Study Area

The baseline data has been collected for the Cotswold District Authority area (which represents the study area) and has been compared to the national average. Some of the data is also reported in Lower Layer Super Output Areas (LSOA), a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. The study area for the scheme covers three LSOAs - Tewkesbury 008A, Cotswold 004B and Cotswold 004C.

#### Protected characteristic groups

##### **Sex**

Table 1 shows that there is a slightly higher female population compared with males across the study area which is slightly higher than the national average<sup>4</sup>.

**Table 1 Percentage of males and females in the Cotswold District Authority Area compared to the national average**

<b>Sex</b>	<b>Cotswold District Authority area</b>	<b>National Average</b>
Female	52%	51%
Male	48%	49%

##### *Religion or Belief*

No indications have been found to suggest this protected characteristic will experience disproportionate impacts during construction or operation, therefore it has not been necessary to collate any related baseline data.

##### **Age**

Table 2 outlines the age breakdown for children (aged 16 and under), young people (16-25 years old) and older people (aged 65 and over) for the Cotswold District Authority area and the national average<sup>5</sup>.

**Table 2 The percentages of children, young people and older people in the Cotswold District Authority area compared to the national average**

<b>Age</b>	<b>Cotswold District Authority area</b>	<b>National Average</b>
Children (under 16 years)	16%	19%
Young People (16-24 years)	9%	11%
Older people (over 65)	25%	18%

The percentage of children and young people is lower than the national average but the proportion of older people is 7% higher than the national average as they make up a quarter of the total population of the Cotswold District Authority area.

15-20% of the population of Tewkesbury 008A and Cotswold 004B LSOAs are under 16 years old, but this drops to 10-15% in Cotswold 004C LSOA (Appendix C.1 Figure 1). 16-25 year-olds make up an even lower relative percentage of each LSOA at 10-15% in Cotswold 004B and 5-10% in Cotswold 004C and Tewkesbury 008A (Appendix C.2 Figure 2). By contrast, the percentage of over 65 year olds in each LSOA is much higher at 20-25% in Cotswold 004B and 004C and 25-30% in Tewkesbury 008A (Appendix C.3 Figure 3).

### *Disability*

Table 3 shows that the percentage of people who are defined as disabled – people who have a physical or mental impairment and the impairment has a substantial and long-term effect on their ability to carry out normal day-to-day activities<sup>6</sup> - in the Cotswold District Authority area is slightly lower than the national average<sup>7</sup>.

**Table 3 Percentage of disabled people in the Cotswold District Authority area compared to the National Average**

<b>Disability</b>	<b>Cotswold District Authority area</b>	<b>National Average</b>
Day-to-day activities limited	16%	18%
Day-to-day activities not limited	84%	82%

At a LSOA level, the percentage of Disability Living Allowance (DLA) claims was taken as an indication of disability. 1-2% of the population of both Cotswold 004B and 004C LSOAs claim DLA whilst the slightly higher percentage of 2-3% of Tewkesbury 008A LSOA's population claims DLA (Appendix C.4 Figure 4).

National Star College has provided more detail regarding their students who have a variety of disabilities and medical conditions. These data were set out in a briefing paper which was provided by the college (included in Appendix D).

### *Race*

No evidence has been found to suggest this protected characteristic will experience disproportionate impacts during construction or operation, therefore it has not been necessary to collate any related baseline data.

### *Sexual Orientation*

No evidence has been found to suggest this protected characteristic will experience disproportionate impacts during construction or operation, therefore it has not been necessary to collate any related baseline data.

### *Gender Reassignment*

No evidence has been found to suggest this protected characteristic will experience disproportionate impacts during construction or operation, therefore it has not been necessary to collate any related baseline data.

### *Pregnancy and Maternity*

Table 4 shows that 1% of children in the Cotswold Local Authority area are aged under one, the same as the national average<sup>8</sup>. This statistic is a good indicator of the pregnancy and maternity characteristic group.

**Table 4 Percentage of children under 1 year in the Cotswold District Authority area compared to the national average**

	<b>Cotswold District Authority area</b>	<b>National Average</b>
Children (under one year)	1%	1%

### *Marriage and Civil Partnerships*

No evidence has been found to suggest this protected characteristic will experience disproportionate impacts during construction or operation, therefore it has not been necessary to collate any related baseline data.

### *Deprivation*

Deprivation can be used as a proxy measure for identifying areas of vulnerable groups, including those belonging to protected characteristic groups. The Index of Multiple Deprivation (IMD) 2019 is an overall relative measure of deprivation constructed by combining seven domains of deprivation. These are as follows:

- **The Income Deprivation Domain** measures the proportion of the population experiencing deprivation relating to low income. The definition of low income used includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests)
- **The Employment Deprivation Domain** measures the proportion of the working-age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities
- **The Education, Skills and Training Deprivation Domain** measures the lack of attainment and skills in the local population. The indicators fall into two sub-domains: one relating to children and young people and one relating to adult skills
- **The Health Deprivation and Disability Domain** measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation
- **The Crime Domain** measures the risk of personal and material victimisation at local level
- **The Barriers to Housing and Services Domain** measures the physical and financial accessibility of housing and local services. The indicators fall into two sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing such as affordability
- **The Living Environment Deprivation Domain** measures the quality of the local environment. The indicators fall into two sub-domains. The 'indoors' living

environment measures the quality of housing; while the 'outdoors' living environment contains measures of air quality and road traffic accidents.

For the purposes of comparison in the IMD, LSOAs are ranked out of the 32,844 LSOAs in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

The A417 Missing Link scheme straddles three LSOAs: Cotswold 004C LSOA within Ermin ward, Cotswold 004B LSOA, also within Ermin ward, and Tewkesbury 008A LSOA within Badgeworth ward.

Tewkesbury 008A LSOA is within the 50% most deprived neighbourhoods in the country. In terms of barriers to housing and services, the LSOA is ranked within the 10% most deprived neighbourhoods and amongst the 40% most deprived for the living environment. However, it is amongst 50% least deprived neighbourhoods for employment and for education, skills and training, and amongst the 40% least deprived for crime and health and disability.

Cotswold 004C LSOA is amongst the 50% least deprived neighbourhoods in the country. It is amongst the 10% least deprived neighbourhoods for income, employment, education, skills and training and health and disability. It also ranks in the 50% least deprived for crime. However, like Tewkesbury 008A LSOA, it is amongst the 10% most deprived neighbourhoods in the country for barriers to housing and services and amongst the 30% most deprived for the living environment.

Cotswold 004B LSOA is amongst the 50% least deprived neighbourhoods in the country. It is amongst the 30% least deprived neighbourhoods for income, employment and educations, skills and training, the 10% least deprived for health and disability and the 40% least deprived for crime. However, like the other two LSOAs above, it scores poorly for barriers to housing and services and the living environment ranking respectively in the 10% and 20% most deprived neighbourhoods in the country.

### Consultation

The scheme has undertaken an extensive approach to stakeholder engagement, through public consultation and the creation of bespoke technical working groups (TWGs). These TWGs consider and advise on specific matters, such as environment and cultural heritage, and walking, cycling and horse riding (WCH). The WCH TWG has a broad spectrum of members, including conservation groups, local authorities and access groups representing vulnerable users. This included the Disabled Ramblers and Active Gloucestershire who work to improve access to the countryside for everyone.

The project team on the scheme has considered the advice given, not only on design but also including disabled users when making reference to this user group. Examples of this are seen in scheme reports and communications that now refer to "walkers, cyclists and horse riders, including disabled users", and design of the proposed Air Balloon Way to incorporate parking for disabled users. Collaborative discussion will continue in the Detailed Design stage to ensure elements like surfacing, wayfinding and lighting are accessible.

The project team on the scheme are in regular conversation with National Star College, a provider of specialist further education, training, personal development and residential services for people with physical and learning disabilities. This is to ensure the scheme, including its construction, considers the needs of the college, its staff and pupils, and

further reference to that is made elsewhere in this document. The scheme is also considering how it can work with the College and other stakeholders to secure wider benefits, such as designated funds bids to improve access to the wider Public Right of Way (PRoW) network.

In order to ensure that all PCGs were not discriminated against, that the above indices of multiple deprivation did not disadvantage any members of the community by preventing them having a say in the consultation, and that as wide a range of the local community were consulted as possible, a consultation strategy was created.

Table 5 summarises the key consultation events to date for the scheme and the main purpose of each event.

**Table 5 Timeline of Consultation**

Date	Consultation Event	Purpose
15 <sup>th</sup> February 2018 to 29 <sup>th</sup> March 2018	Non-statutory consultation on route options	Non-statutory consultation to gather the views of future statutory consultees, the public and other interested parties on the route options identified via the options appraisal process.
June and July 2018	Further stakeholder consultation to support Stage 2 EqlA	Further stakeholder consultation was undertaken in June and July 2018 to support the Stage 2 EqlA. This included telephone interviews with representatives from local parish councils and with operators of local community facilities, such as Birdlip School, who may be affected by the scheme.
27 <sup>th</sup> September 2019 and 8 <sup>th</sup> November 2019	Statutory public consultation on proposals (Preliminary design consultation)	To seek the views of statutory consultees, the local community and other interested groups and individuals on the scheme proposal which had evolved following the preferred route announcement in March 2019. The consultation also sought feedback on the preliminary environmental information which had been reported for the scheme.
13 <sup>th</sup> October – 12 <sup>th</sup> November 2020	Statutory public consultation on proposals (Supplementary preliminary design consultation)	To seek the views of statutory consultees, the local community and other interested groups and individuals on the revised scheme proposal, following design changes as a result of consultation to date. The consultation also sought feedback on the revised preliminary environmental information which had been reported for the scheme.

Table 6 details the specific consultation methods, used during the statutory consultation period in 2019, to try and reach as many people as possible, including hard-to-reach groups.

**Table 6 Specific consultation methods used in consultation between 27th September and 8th November 2019**

Method	Detail
Public consultation events	<p>Highways England held a series of public consultation events to allow the local community to view the proposal, talk with representatives from the project team on the scheme and provide written feedback via paper copies of the feedback questionnaire, completing the questionnaire online or emailing <a href="mailto:a417missinglink@highwaysengland.co.uk">a417missinglink@highwaysengland.co.uk</a>. The events took place at the following locations and times:</p> <ul style="list-style-type: none"> <li>Gloucester Rugby Club, Kingsholm Rd, Gloucester, GL1 3AX, Monday 30 September, 2pm – 8pm</li> </ul>

- National Star College, Ullenwood, GL53 9QU, Thursday 3 October, 1pm - 8pm
- Witcombe and Bentham Village Hall, Pillcroft Road, GL3 4TB, Saturday 5 October, 11am –6pm
- St Andrews Church Hall, Montpellier Street, Cheltenham, GL50 1SP, Monday 7 October, 11am – 6pm
- Birdlip Church, Birdlip, GL4 8JH, Wednesday 9 October, 2pm – 7pm
- Cirencester Town Council, Bingham House, 1 Dyer St, Cirencester, GL7 2PP, Friday 11 October, 11am – 6pm
- Churchdown Community Association, Parton Road, Churchdown, Gloucester, GL3 2JH, Tuesday 15 October, 2pm – 8pm

To ensure everyone had a clear understanding of the background to the scheme, the options being consulted on and the way that feedback could be provided, the following consultation materials were made available at the events and online:

- Consultation booklet: This explained the need for the scheme and its objectives, how the scheme proposals have been developed and how feedback could be provided.
- Feedback form: This was available in hard copy and online and was used to help collect people's views during the consultation process. The feedback form was set out as a questionnaire and enabled feedback to be provided on the scheme's route options, as well as on the consultation process. It allowed people to make comments to support their responses.
- Maps: Maps of the scheme and other consultation materials were available for people to view.
- Visualisation video: This showed a 'fly-through' of the proposed scheme to help people understand the route and see how it might look in the landscape. The video was available online (<https://youtu.be/9LaTBb9qZ-s>) and also shown on television screens at public events.
- Exhibition banners: These were displayed at public events and were also available online for those who could not attend events to view.
- Online: The Highways England website scheme pages were updated to announce the consultation. This site also took you to the consultation documentation which could be viewed on Citizenspace.
- Press and Media: DfT and Highways England announced the launch of consultation via press and social media activity.

When selecting the venues for the non-statutory consultation exercise Highways England 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 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 (Document Reference 5.1).

The locations of deposit points for hard copy consultation feedback were pulled together in conjunction with the local authorities, and more were added during the Statement of Community Consultation

	(SoCC) process. These were all publicly accessible points such as council offices, libraries and the Crickley Hill Visitors Centre.
Stakeholder briefing	Highways England hosted a briefing event at the start of the consultation to raise awareness of the consultation amongst local stakeholders and organisations.
Postcard mail out	Working with Cotswold District Council, Tewkesbury Borough Council and Gloucestershire County Council, Highways England developed a consultation target area for the distribution of the consultation information. This was based on who Highways England thought would be most affected by the proposals. Highways England let people within the local area know about the consultation by sending them a postcard. The postcard provided details of the public consultation events, how to find out more information and provide feedback. Addresses will be taken from the latest version of the Royal Mail database.
Directly affected landowners	Letters and maps were sent out to directly affected landowners and those residing inside the scheme DCO Boundary.
Media releases	Highways England issued a media release to the following local press publications and media outlets at the start of the consultation period: <ul style="list-style-type: none"> <li>• Gloucestershire Echo</li> <li>• Gloucestershire Citizen</li> <li>• Gloucestershire Live</li> <li>• Western Daily Press</li> <li>• BBC Points West/South West</li> <li>• ITV South West</li> <li>• Breeze FM</li> <li>• Heart FM</li> </ul> A second media release was issued to these publications and outlets before the end of the consultation period to encourage people to provide their feedback before the consultation period closed.
Emails and letters	Highways England sent either emails or letters advising of the consultation and how to get involved to: <ul style="list-style-type: none"> <li>• MPs in the Gloucestershire area</li> <li>• MEPs representing the South West region</li> <li>• Elected representatives at Cotswold District Council, Tewkesbury Borough Council and Gloucestershire County Council</li> <li>• Directly affected parish councils</li> <li>• Parish councils/meetings adjacent to directly affected parish councils.</li> </ul>
Statutory notices	Statutory notices to publicise the proposed DCO Application and the SoCC were published as follows: <ul style="list-style-type: none"> <li>• proposed DCO Application - once in a national newspaper and the London Gazette and twice in local circulating newspapers</li> <li>• publicising the SoCC - in two local circulating newspapers.</li> </ul>
Media advert	Highways England placed an advert advising of the consultation and promoting the public consultation events in the online edition of Gloucestershire Live.
Social media	Highways England promoted the consultation on Highways England's South West Twitter account, @HighwaysSWEST and



	also ran a Facebook advertising campaign. Consultation feedback was not accepted through social media channels.
Partner communications	Highways England provided information regarding the consultation, including posters, to directly affected local authorities, parish councils and other organisations such as GFirst Gloucestershire Local Enterprise Partnership (LEP) and Cotswold Way Association so that they could raise awareness of the consultation through their own communications channels.
Scheme website	Information on the scheme, public consultation events, what Highways England are consulting on and how to respond was available on the scheme website. This became publicly available on Friday 27 October 2019, the start date of consultation.
Virtual Consultation	Highways England promoted use of the virtual consultation to assist those that were physically unable to get to a public consultation event in person. The virtual consultation enabled users to explore all the different elements of the scheme at the using the following link. <a href="http://westdigital.arup.com/virtualengage/A417/viewer_mobile.html">http://westdigital.arup.com/virtualengage/A417/viewer_mobile.html</a> The public were also able to familiarise themselves with the scheme using the scheme visualisation.

Table 7 details the consultation methods undertaken during the consultation period in 2020.

**Table 7 Specific consultation methods used in consultation between 13th September and 12th November 2020**

Method	Detail
<b>Have Your Say</b>	
Have Your Say invitation	Highways England wrote to all registered users (those who have subscribed to scheme updates) of the Highways England scheme website and respondents of the previous consultation that wished to stay in touch. This included a link to the consultation website, details of the virtual consultation events and a link to a video introducing the consultation and how to get involved.
Talking heads video	Highways England published a video of members of the project team on the scheme introducing the consultation on the Highways England website, social media channels and shared it with local media platforms.
Partnership communications	Highways England provided a digital pack of information about the Consultation, including blocks of text and images, to stakeholders so that they could promote the forthcoming consultation on their own communications channels. This included the directly affected local authorities, GFirst LEP and other stakeholders who had expressed an interest in helping us promote the consultation.
Stakeholder briefings	Highways England arranged to brief key stakeholders, including MPs, local authorities and parish councils, prior to the launch of the consultation to advise them of how Highways England planned to undertake the consultation and how they could get involved.
<b>Consultation</b>	
Virtual exhibitions	Due to COVID-19, it was not possible for Highways England to host face to face consultation events in the local community. Instead, Highways England hosted a number of online events in the form of a virtual exhibition during the consultation period. To replicate public events as much as possible, topic specialists and members of the project team on the scheme were on hand to answer

	<p>questions from members of the public at allocated times, which are detailed below. The virtual exhibition room was open 24/7 during the consultation period.</p> <p>Highways England held 17 virtual consultation events at a range of times and days, to include lunchtimes, evenings and weekends. Dates and times are provided below:</p> <ul style="list-style-type: none"> <li>• 13 October 2020, 11am – 2pm</li> <li>• 13 October 2020, 6pm – 8pm</li> <li>• 16 October 2020, 8am – 11am</li> <li>• 16 October 2020, 4pm – 7pm</li> <li>• 17 October 2020, 9am – 1pm</li> <li>• 20 October 2020, 11am – 2pm</li> <li>• 22 October 2020, 6pm – 9pm</li> <li>• 24 October 2020, 1pm – 4pm</li> <li>• 27 October 2020, 8am – 11am</li> <li>• 29 October 2020, 2pm – 5pm</li> <li>• 2 November 2020, 10am – 1pm</li> <li>• 2 November 2020, 6pm – 9pm</li> <li>• 4 November 2020, 4pm – 7pm</li> <li>• 7 November 2020, 9am – 1pm</li> <li>• 10 November 2020, 8am – 11am</li> <li>• 10 November 2020, 6pm – 9pm</li> <li>• 12 November 2020, 8am – 11am</li> </ul> <p>The dates and times of the virtual consultation events were detailed on the scheme website, included in consultation publicity materials, promoted via press and social media and editorial coverage was also be sought in local and hyperlocal publications.</p> <p>Comments made via the online exhibition chat function were not considered as formal responses to the consultation. Regard was had to written responses to the consultation, via the feedback questionnaire, and emails or letters to the project team on the scheme.</p> <p>Had government restrictions about public events been eased before the end of the consultation period, Highways England may have decided to hold some in-person consultation events. This would only have been considered if it were deemed safe to do so and could be delivered within government guidelines. Public health remained the priority. Should in-person events have been deemed practical and possible, these would have been arranged in consultation with local authorities and notice of any alternative arrangements would have been given as soon as possible, using methods similar to those outlined above.</p>	
Stakeholder briefing	Highways England hosted a briefing event at the start of the consultation to raise awareness of the consultation amongst local stakeholders and organisations.	
Postcard mail out	<p>Working with Cotswold District Council, Tewkesbury Borough Council and Gloucestershire County Council, Highways England developed a consultation target area for the distribution of the consultation information. This was based on who Highways England thought would be most affected by the proposals.</p> <p>Highways England let people within the local area know about the consultation by sending them a postcard. The postcard provided details of the public consultation events, how to find out more information and</p>	

	provide feedback. Addresses will be taken from the latest version of the Royal Mail database.
Directly affected landowners	Letters and maps were sent out to directly affected landowners and those residing inside the scheme DCO Boundary.
Media releases	<p>Highways England issued a media release to the following local press publications and media outlets at the launch of the 'Have Your Say' campaign, and issued a second media release start of the consultation period:</p> <ul style="list-style-type: none"> <li>• Gloucestershire Echo</li> <li>• Gloucestershire Citizen</li> <li>• Gloucestershire Live</li> <li>• Western Daily Press</li> <li>• Wiltshire and Gloucestershire Standard</li> <li>• Cotswold Journal</li> <li>• BBC Points West/South West</li> <li>• ITV South West</li> <li>• BBC Radio Gloucestershire</li> <li>• Breeze FM</li> <li>• Heart FM</li> </ul> <p>A third media release was issued to these publications and outlets before the end of the consultation period to encourage people to provide their feedback before the consultation period closed.</p>
Emails and letters	<p>Highways England sent either emails or letters advising of the consultation and how to get involved to:</p> <ul style="list-style-type: none"> <li>• MPs in the Gloucestershire area</li> <li>• Elected representatives at Cotswold District Council, Gloucestershire County Council and Tewkesbury Borough Council</li> <li>• Host parish councils</li> <li>• Adjacent local authorities to include parish councils/meetings.</li> </ul>
Statutory notices	<p>Statutory notices to publicise the proposed DCO Application and the SoCC were published as follows:</p> <ul style="list-style-type: none"> <li>• proposed DCO Application - once in a national newspaper and the London Gazette and twice in local circulating newspapers</li> <li>• publicising the SoCC - in two local circulating newspapers.</li> </ul>
Media advert	Highways England placed an advert advising of the consultation and promoting the public consultation events in the online edition of Gloucestershire Live.
Social media	Highways England promoted the consultation on Highways England's South West Twitter account, @HighwaysSWEST and also ran a Facebook advertising campaign. Consultation feedback was not accepted through social media channels.
Partner communications	Highways England provided information regarding the consultation, including posters, to directly affected local authorities, parish councils and other organisations such as GFirst LEP and Cotswold Way Association so that they could raise awareness of the consultation through their own communications channels.
Hard to reach group engagement	Highways England contacted hard to reach groups in advance of the 'Have Your Say' campaign and launch of consultation, to advise them of the forthcoming consultation and gain insight into the best way to consult with their members.
Scheme website	Information on the scheme, public consultation events, what Highways England were consulting on and how to respond was be available on the scheme website. The information was published on the scheme website following the launch of the 'Have Your Say' campaign.

## Hard-to-reach groups

Hard-to-reach groups can be broadly defined as those that may have specific requirements to access consultation information or may be less likely to be involved in consultation in comparison with other local residents. It was on this basis that the hard-to-reach groups and organisations were identified. The identified groups can be broadly classified as follows:

- Economically challenged and socially deprived communities
- Those without internet access or that do not access information digitally
- Young (16-24 year olds)
- Old (+65)
- LGBT+
- People with disabilities
- Ethnic minorities
- Holiday homeowners, tourists and visitors
- Time constrained, e.g. working parents
- Traveller communities

A total of 37 specific hard-to-reach groups were invited to take part in the statutory consultation in 2019, as listed in Table 8.

The process began with an email and telephone conversation to initiate contact and ascertain how best to engage with the organisations and their members. They were then issued stakeholder information packs at different points throughout the consultation, which included social media posts, website and leaflet copy, and images.

**Table 8 Engagement with groups representing those with protected characteristics during consultation period in 2019**

Category	Group
People with disabilities	Gloucestershire Deaf Association (GDA)
	Building Circles
	Brandon Trust
	Insight Gloucestershire
	National Star College (NSC)
Isolated, Elderly or Vulnerable People	Carers Gloucestershire
	2gether NHS Foundation Trust
	Cirencester Community Development Trust
	Age UK Gloucestershire
	Cotswold Friends
Young People	Young Gloucestershire
	Gloucestershire College
	Peter Lang Children's Trust
	Cirencester Housing for Young People
	Youth Support Team
Time Constrained/Busy Working People	Birdlip Primary School
	Sapperton Primary School
	Castle Hill School
	Cranham Primary School

	Ridgemount Cottage Nursery
	The Little People Day Nursery
	Stratton Primary School
	Shurdington Primary School
	Brockworth Primary School
Economically Challenged People	Severn Vale Housing (Now part of Bromford)
	Gloucester City Homes
	Cirencester Housing Society
	Cheltenham Borough Homes
	Gloucestershire Community Foundation
Ethnic Minorities	Gloucester Chinese Women's Guild
	Gloucester Muslim Welfare Association
	The Hindu Cultural Association Gloucester
LGBT+	The Gloucestershire Gay & Lesbian Community
	The Proud Trust
	Gay-Glos
Holiday Home Owners, Tourists and Visitors	Explore Gloucestershire
	The Cotswolds Tour Guide

During the statutory consultation period in 2020, the list of hard to reach groups and people with protected characteristics who were invited to take part was expanded to 45 groups which are detailed in Table 9.

**Table 9 Engagement with groups representing those with hard to reach groups/people with protected characteristics during consultation period in 2020**

Category	Group
People with disabilities	Gloucestershire Deaf Association (GDA)
	Building Circles
	Brandon Trust
	Insight Gloucestershire
	Gloucestershire Disability Forum
	National Star College (NSC)
Isolated, Elderly or Vulnerable People	Carers Gloucestershire
	2gether NHS Foundation Trust
	Cirencester Community Development Trust
	Age UK Gloucestershire
	Cotswold Friends
	Cotswold Old Peoples Housing Association
	Gloucestershire Rural Communities Council
	North Cotswold Community Awareness
	PeopleForYou
	The Churn Project
Young People	Young Gloucestershire
	Gloucestershire College
	Peter Lang Children's Trust
	Cirencester Housing for Young People
	Youth Support Team
	Cotswold Youth Network (World Jungle)

Time Constrained/Busy Working People	Birdlip Primary School
	Sapperton Primary School
	Castle Hill School
	Cranham Primary School
	Ridgemount Cottage Nursery
	The Little People Day Nursery
	Stratton Primary School
	Shurdington Primary School
	Brockworth Primary School
	CMAS CIC School
	Coberley C of E Primary School
Economically Challenged People	Severn Vale Housing (Now part of Bromford)
	Gloucester City Homes
	Cirencester Housing Society
	Cheltenham Borough Homes
	Gloucestershire Community Foundation
	Cottsway Housing
Ethnic Minorities	Gloucester Chinese Women's Guild
	Gloucester Muslim Welfare Association
	The Hindu Cultural Association Gloucester
LGBT+	The Gloucestershire Gay & Lesbian Community
	The Proud Trust
	Gay-Glos
Holiday Home Owners, Tourists and Visitors	Explore Gloucestershire
	The Cotswolds Tour Guide

Further to the consultation methods listed in Table 6, in order to ensure that as many as possible hard-to-reach groups and individuals were aware of the consultation and able to take part, including those in addition to those listed in Table 8, a range of communications techniques were used to encourage their involvement, including:

- Providing information in plain English.
- Making sure events are held at times and through methods convenient and accessible to as many people as possible.
- Displaying posters at strategic locations within the direct mail zone.
- Seeking to gain wide-spread media coverage.
- Sending press releases to relevant local newsletters/publications.
- Placing advertisements in local newspapers/publications.
- Sending information directly to people's homes in the direct mail zone.
- Providing key scheme updates and encourage engagement via social media.
- Ensuring that hard copies of documents and information are available at defined deposit locations or via local community groups, subject to public buildings being available to host subject to latest government guidance associated with covid-19.
- Providing key information documents in alternative formats on request, e.g. large print, Braille and alternative languages.
- Consider providing a translation service of non-technical documents on reasonable request.
- Ensuring representatives of hard to reach groups are invited to attend engagement events.

- Ensuring representatives of hard to reach groups are sent consultation materials in the manner requested.

The SoCC (Document Reference 7.3, REP1-006), which includes details of how the consultation was carried out, can be found on the Planning Inspectorates project website here: <https://infrastructure.planninginspectorate.gov.uk/projects/south-west/a417-missing-link/>

### *Walkers, Cyclists and Horse riders (WCHs) and Vulnerable users*

The Environmental Statement (ES) Appendix 2.1 Environmental Management Plan (EMP) Annex F Public Rights of Way (PRoW) Management Plan (Document Reference 6.4) sets out the provision within the scheme for walking, cycling and horse riding, including disabled users. That document has been prepared collaboratively with user groups including the Disabled Ramblers. ES Appendix 2.1 EMP Annex F PRoW Management Plan (Document Reference 6.4) sets out proposals for safe access for all groups where possible. Highways England aims for a maximum gradient of 5% on new walking and cycling routes but accept this may not be possible on all / existing routes. Matters such as aesthetics, surfacing, signage and enclosures will be discussed and agreed at the detailed design stage.

### *National Star College*

National Star College (NSC) is a '*national charity providing high quality education, personal development, care, accommodation and support services for young people with complex disabilities and learning difficulties from across the UK*<sup>9</sup>. NSC, is located in Ullenwood, Gloucestershire. NSC '*enables young people with disabilities to realise their potential through education and personalised learning opportunities, [and provides] other transition and accommodation services*'.

NSC offers individually tailored programmes '*with a strong emphasis on creative and performing arts, sports, communication skills and life skills*'. Some of the students are residents on the site whilst others travel in on a daily basis.

Appendix E sets out the engagement that has been carried out with NSC over the duration of the project. This runs from September 2019 to the present day and identifies the topics of discussion and issues raised.

### Equality Hotspot Maps

Highways England has published "Hot Spot Maps" for defined areas across England, to be used as a tool to use to inform EqIA. These maps rate areas on a six-point scale under the following categories:

- Equality Hot Spots (those parts of the Area with concentrations of all categories – people, equality groups and destinations).
- Population Quintiles (those parts of the Area with the largest numbers of people).
- Equality Population Quintiles (those parts of the Area with the largest numbers of people from particular groups).
- Equality Population Proportions (those parts of the Area with the largest proportions of people from particular groups).
- Trip Attractors (those parts of the Area with the highest numbers of destinations such as schools, hospitals, religious buildings and care homes).



Appendix A details the Equality Hot Spot Maps for Highways England Area 2, within which the scheme is located.

**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

This section sets out the potential impacts of the scheme on protected characteristic groups during construction and operation. An assessment is made of the equality effects of potential impacts identified in the following chapters of the ES (Document Reference 6.2) for the scheme:

- Chapter 5 Air Quality (Document Reference 6.2)
- Chapter 6 Cultural Heritage (Document Reference 6.2)
- Chapter 7 Landscape and Visual Effects (Document Reference 6.2)
- Chapter 11 Noise and Vibration (Document Reference 6.2)
- Chapter 12 Population and Human Health (Document Reference 6.2)
- Chapter 14 Climate (Document Reference 6.2)
- Chapter 15 Assessment of Cumulative Effects (Document Reference 6.2)

The findings from the following documents have also been reviewed to identify further impacts on protected characteristic groups:

- Economic Appraisal Report (Document Reference 7.6)
- Distributional Impact Appraisal (Document Reference 7.6)
- ES Appendix 2.1 EMP (Document Reference 6.4)
- ES Appendix 2.1 EMP Annex F PRoW Management Plan (Document Reference 6.4)
- Inclusion Action Plan (internal Highways England document)
- Consultation Report (Document Reference 5.1)
- Statement of Community Consultation (Document Reference 5.2)

The assessment considers both disproportionate and differential effects. A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on members of the general population at a particular location. For the purpose of this EqIA, disproportionality is defined in the following ways:

- Where an impact is predicted for the area in which an equality group is known to make up a greater proportion of the affected resident population than their representation in the wider local authority district and/or county/region
- Where an impact is predicted on a community resource predominantly or heavily used by an equality group (e.g. primary schools attended by children; care homes catering for very elderly people).

A differential equality effect is one which affects members of an equality group differently from the rest of the general population because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristic. In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects. The EqIA considers impacts on groups of people rather than on individuals.

ES Chapter 2 The project (Document Reference 6.2) identifies embedded mitigation for the scheme that assists with minimising potential equality effects.

Table 10 details the potential impacts on different equality groups as well as the evidence basis for these conclusions. The impacts can be positive, negative or neutral.

**Table 10 Potential Impacts on Equality Groups by the scheme**

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
Sex		<b>X</b>		<p>Construction Phase: temporary WCH route disruption</p> <p>Evidence from the National Travel Survey suggests that women make more walking trips than men<sup>10</sup>. Women are therefore likely to be more sensitive to any changes to WCH provision when compared to other groups.</p> <p>A number of WCH will experience temporary stopping-up and/or diversions during the construction stage to provide access to the works and safeguard Public Rights of Way (PRoW) users. Where it is considered safe to do so, PRoW in close proximity to construction works or that adjoin roads that may be affected by works will remain open with appropriate signage to warn of the presence of construction vehicles, and to warn drivers of the presence of WCHs. In certain instances, a banks person could be used to hold users of the PRoW network for short periods to allow for safe passage of construction traffic. Where it is not considered safe to keep PRoW open with appropriate signage during construction works, the need for a diversion, signage and other relevant details will be discussed and agreed with Gloucester County Council (GCC).</p> <p>As the evidence from the National Travel Survey has indicated women make more walking trips than men, they are likely to be disproportionately negatively impacted by the temporary diversions and closures of WCH routes.</p>
	<b>X</b>			<p>Operational Phase: permanent improvements to pedestrian safety</p> <p>Although 2 PRoWs will be stopped up and no substitute will be provided, the following improvements/replacements will be made for the PRoW network:</p> <ul style="list-style-type: none"> <li>• 15 PRoW to be stopped up for which a substitute is to be provided. This relates to instances where diversion of PRoW is required (e.g. to where parts of the scheme sever existing PRoW and opportunities exist to create new routes to replace their original routes to maintain or improve accessibility)</li> <li>• 13 new PRoW to be provided. This includes new footpaths, bridleways and restricted byways which all seek to enhance overall connectivity and encourage active travel across the network</li> <li>• 4 reclassified sections of PRoW. These proposals seek to facilitate a greater use of existing routes to enhance connectivity for different users</li> </ul>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				<ul style="list-style-type: none"> <li>promotion of access rights along 4 unclassified roads / Other Roads with Public Access (ORPAs) to increase local connectivity via PRoWs. These offer opportunity to further connect the PRoW network.</li> </ul> <p>Moreover, more generally the scheme would reduce the amount of traffic and 'rat-running' through the villages, thereby potentially improving WCH safety. Consequently, the PRoW improvements and replacements outlined above, together with a reduction in rat-running and traffic, will disproportionately benefit women.</p>
Religion or Belief			<b>X</b>	No disproportionate or differential impacts associated with this protected characteristic have been identified.
Age Children 0-16 years old		<b>X</b>		<p><i>Construction Phase: temporary noise and air quality impacts</i></p> <p>Construction of the scheme is likely to generate an increase in noise and air pollution levels in the local area for a period of up to three years. Air quality levels may be negatively affected due to the closure of lanes, the additional movement of construction vehicles, associated demolition and enabling works. This could have a differential impact on children, who are more sensitive to changes in air quality and noise levels.</p> <p>Exposure to poor air quality during infancy, when the central nervous system develops, can result in neurodevelopment and long-term cognitive health problems<sup>11</sup>. In addition, research from Asthma UK indicates that pollution impacts children with asthma more than other age groups, as children have faster breathing rates, and their lungs are still growing<sup>12</sup>. During the construction phase, additional congestion is likely to occur as single lane running will be in operation. Levels of pollutants, such as nitrogen dioxide, are higher in surrounding areas when traffic is moving slowly. Research conducted by Transport for London (TfL), for example, indicates that traffic travelling at 10km/h produces nearly double the amount of emissions as traffic travelling at 20km/h<sup>13</sup>.</p> <p>Evidence from the World Health Organisation also indicates that exposure to noise can affect children's school performance, and well as their physical, social and emotional development<sup>14</sup>.</p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				<p>There are 2 residential properties within 200m of the scheme meaning children, if resident in these houses, may experience effects associated with noise and air quality levels.</p> <p>Engagement with stakeholders also indicated that a significant number of pupils travel to Birdlip school via the A417. During the construction period there may be tailbacks which could result in children experiencing air quality effects.</p> <p>Best practice air and noise pollution mitigation measures will be also used to ensure the impacts of any reduction in air quality and from noise pollution are minimised as far as possible.</p>
		<b>X</b>		<p><i>Construction Phase: temporary impacts to WCH routes</i></p> <p>According to the National Travel Survey<sup>15</sup>, children, of both sexes, take the highest number of trips by walking, largely for education access, than almost any other age group and will therefore be disproportionately impacted by any changes to WCH routes.</p> <p>A number of WCH will experience temporary stopping-up and/or diversions during the construction stage to provide access to the works and safeguard PRow users. Where it is considered safe to do so, PRow in close proximity to construction works or that adjoin roads that may be affected by works will remain open with appropriate signage to warn of the presence of construction vehicles, and to warn drivers of the presence of WCHs. In certain instances, a banks person could be used to hold users of the PRow network for short periods to allow for safe passage of construction traffic. Where it is not considered safe to keep PRow open with appropriate signage during construction works, the need for a diversion, signage and other relevant details will be discussed and agreed with GCC.</p>
	<b>X</b>			<p><i>Operational Phase: permanent improved WCH safety</i></p> <p>By improving the capacity and resilience of the A417, the scheme aims to reduce 'rat-running' through local villages and therefore reduce interaction between pedestrians and vehicles. Stakeholders indicate that villages like Cowley, Birdlip and Coberley all experience increased traffic as motorists attempt to circumvent tailbacks on the A417 – the scheme plans to address this problem.</p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				<p>Increased pedestrian safety is particularly important for children, as children are disproportionately more likely to walk than other age groups and are more likely to be represented in accident data. Walking accounts for a third of all trips undertaken by children and is the most popular method of getting to primary school<sup>16</sup>. The location of a primary school in Birdlip suggests that there are likely to be more children walking to and from school in this area who will therefore be disproportionately beneficially affected.</p> <p>By increasing capacity and resilience, the scheme would reduce the amount of traffic through the villages, therefore potentially improving WCH safety. In addition, the construction of four overbridges and an underpass with WCH provision will enable existing pedestrian severance to be reduced.</p>
	<b>X</b>			<p><i>Operational Phase: permanent improvements in air quality</i></p> <p>The British Lung Foundation has noted that children are more vulnerable to breathing in polluted air than adults<sup>17</sup>. Currently, an Air Quality Management Areas (AQMA) is located at the Air Balloon roundabout, which indicates that NO<sub>2</sub> levels exceed national annual levels. As such, longer-term measures to reduce congestion and improve vehicle speeds through the dualling of the A417 and the reduction of rat-running will reduce levels of local emissions.</p> <p>Moreover, the preliminary scheme design moves traffic away from local sensitive receptors, in particular those receptors in the existing Birdlip AQMA. By moving traffic away from receptors, it allows a greater distance over which pollutants can disperse meaning air quality during operation will improve for local sensitive receptors, such as children living locally with breathing problems<sup>18</sup>, therefore disproportionately benefitting children.</p>
	<b>X</b>			<p><i>Operational Phase: permanent reduction in noise impacts</i></p> <p>A low noise road surface would be incorporated throughout the scheme. The alignment of the road also results in the creation of cuttings, and roadside landscaping and screening in the form of earthworks bunds. This has resulted in the number of people adversely affected by noise across the scheme being reduced. Moreover, the horizontal and vertical alignment of the scheme, as part of the engineering design, has resulted in larger distances between the dwellings and the new A417 in some locations, or increased screening (from</p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				cuttings). This would result in reduced noise exposures for sensitive receptors, including children.
	<b>X</b>			<p><i>Operational Phase: permanent improvements to pedestrian safety</i></p> <p>Although two PRowWs will be stopped up and no substitute will be provided, the following improvements/replacements will be made for the PRow network:</p> <ul style="list-style-type: none"> <li>• 15 PRow to be stopped up for which a substitute is to be provided. This relates to instances where diversion of PRow is required (e.g. to where parts of the scheme sever existing PRow and opportunities exist to create new routes to replace their original routes to maintain or improve accessibility)</li> <li>• 13 new PRow to be provided. This includes new footpaths, bridleways and restricted byways which all seek to enhance overall connectivity and encourage active travel across the network</li> <li>• four reclassified sections of PRow. These proposals seek to facilitate a greater use of existing routes to enhance connectivity for different users</li> <li>• promotion of access rights along four unclassified roads / ORPAs to increase local connectivity via PRowWs. These offer opportunity to further connect the PRow network.</li> </ul> <p>Moreover, more generally the scheme would reduce the amount of traffic and 'rat-running' through the villages, thereby potentially improving WCH safety. Consequently, the PRow improvements and replacements outlined above, together with a reduction in rat-running and traffic, will disproportionately benefit children who make a larger number of walking trips than almost any other age group<sup>15</sup>, largely due to the need to access education.</p>
Young People 16-24 years old	<b>X</b>			<p><i>Operational phase: safety of the new road environment</i></p> <p>The majority of young driver fatalities occur on rural roads; in 2013, 82% of the 131 young driver fatalities occurred on rural roads<sup>19</sup>.</p> <p>Upgrading the road is likely to improve the driving environment for this group. The higher level of design standards, grade separated junctions and barriers between carriageways would reduce the risk of head-on and at junction collisions<sup>20</sup>.</p>



Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				<p>The scheme includes the creation of a dual carriageway, thereby potentially increasing levels of user safety because of the scheme; dual carriageways are statistically safer than single carriageways. In addition, the construction of four overbridges and an underpass with WCH provision will enable existing pedestrian severance to be reduced.</p>
Older people over 65		<b>X</b>		<p><i>Construction Phase: temporary reduction in air quality</i></p> <p>During construction, impacts associated with reduced air quality may be exacerbated, due to additional construction traffic, construction works and additional congestion as a result of the operation of single lane running.</p> <p>Older people may be more susceptible to the effects of air quality changes than other age groups, particularly if they have another chronic obstructive pulmonary disease (COPD) or long-term health condition<sup>21</sup>.</p> <p>Consequently, older people living close to the A417 may be differentially impacted by these adverse changes to air quality during construction.</p> <p>Standard best practice construction techniques will be used to mitigate air quality impacts as much as possible (see the Environmental Management Plan for more information).</p>
	<b>X</b>			<p><i>Operational Phase: permanent increase in user safety</i></p> <p>By improving the capacity and resilience of the A417, the scheme aims to reduce rat-running through local villages and therefore reduce interaction between WCHs and vehicles. Stakeholders indicate that villages like Cowley, Birdlip and Coberley all experience increased traffic as motorists attempt to circumvent tailbacks on the A417.</p> <p>By increasing capacity and resilience, the scheme would reduce the amount of traffic through the villages, therefore potentially improving WCH safety. In addition, the construction of four overbridges and an underpass with WCH provision will enable existing pedestrian severance to be reduced.</p>
	<b>X</b>			<p><i>Operational Phase: permanent improvements in air quality</i></p> <p>According to The Department for Environment, Food &amp; Rural Affairs (DEFRA), older people are more likely to have heart and lung conditions which can be</p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				<p>exacerbated by high levels of air pollution<sup>22</sup>. Currently, an AQMA is located at the Air Balloon roundabout, which indicates that NO<sub>2</sub> levels exceed recommended national annual levels. Therefore, long-term measures to reduce congestion and increase vehicle speeds on the A417 (which leads to a reduction NO<sub>2</sub> levels) are likely to have a beneficial impact on older people living locally who experience respiratory problems<sup>23</sup>. Moreover, the preliminary scheme design moves traffic away from local sensitive receptors, in particular those receptors in the existing Birdlip AQMA. By moving traffic away from receptors, it allows a greater distance over which pollutants can disperse meaning air quality during operation will improve for local sensitive receptors. Stakeholders have also indicated that the scheme is likely to reduce congestion from slow-moving HGVs on Crickley Hill, thereby improving air quality in the surrounding area.</p>
		<b>X</b>		<p><i>Operational Phase: impact on driver confidence</i></p> <p>The scheme would require road widening and new cuttings to the south of Crickley Hill. This, and other changes to the road layout, could cause issues, highlighted by stakeholders, such as older drivers potentially experiencing confusion over changes to roads that they regularly use. The scheme will permanently change the layout of the road, so this is likely to result in adverse differential impacts on this group in the initial phases of operation. It is therefore a temporary impact.</p> <p>The comments made by stakeholders are supported by a 2016 report published by the Older Drivers Task Force<sup>24</sup>. The report highlighted that older drivers can have reduced ability to make judgements, adapt their speed and read complex situations whilst driving. A driver's vision, reaction time, and skills in executing manoeuvres can all decline with age. Information published by the road safety charity Brake also noted that older drivers are over represented in crashes at junctions because of failing to look and failing to judge the speed of oncoming traffic<sup>25</sup>.</p>
	<b>X</b>			<p><i>Operational phase: safety of the new road environment</i></p> <p>DfT reported that, in 2016, of the 123 older car driver fatalities due to collisions, 72% occurred on rural roads. This is largely because rural roads have a much</p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				<p>higher speed limit than urban roads, are more sinuous and have blind bends and dips in the road<sup>26</sup>.</p> <p>The scheme and its junctions have been designed to appropriate standards (DMRB), to allow safe access to existing facilities and services. Upgrading the road is likely to improve the driving environment for this group. The higher level of design standards, grade separated junctions and barriers between carriageways may reduce the risk of head-on and at junction collisions<sup>27</sup>.</p> <p>The scheme includes the creation of a dual carriageway, where previously there was only a single carriageway, therefore potentially increasing levels of user safety; dual carriageways are statistically safer than single carriageways. As older people are disproportionately represented in rural road accidents, improvements to the route will result in disproportionate beneficial effects for this group.</p>
Disability		<b>X</b>		<p><i>Construction Phase: temporary changes to air quality</i></p> <p>As mentioned previously, the scheme will result in increased air pollution during construction.</p> <p>Disabled people are likely to be differentially negatively impacted by an increase in air pollution during construction of the scheme<sup>28</sup>.</p> <p>Evidence from DEFRA shows that people with lung or heart conditions are at an increased risk of becoming ill and needing treatment when levels of air pollutants rise<sup>29</sup>.</p> <p>Standard best practice construction techniques will be used to mitigate air quality impacts as much as possible. The project team on the scheme will also be engaging with specific disability stakeholder groups throughout construction to minimise any potential negative impacts on this vulnerable group.</p>
		<b>X</b>		<p><i>Construction Phase: temporary disruption to National Star College</i></p> <p>During construction, there would be increased noise levels, which may impact on students at the National Star College, a higher education centre for students with physical and learning disabilities that has approximately 190 students, two-thirds of whom are residential<sup>30</sup>. A high proportion of students have an autistic</p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				<p>spectrum disorder. Research indicates that 65% of people with autism are more sensitive to noise than the wider population<sup>31</sup>.</p> <p>Noise can impact upon students' learning; students attending schools with higher outdoor noise levels are more likely to have delayed language and reading skills<sup>32</sup>. In addition, as the college has a residential facility, any night time construction work may impact upon students' sleep, resulting in fatigue and lack of concentration<sup>33</sup>.</p> <p>There may be some disruption to access for day students during the construction phase. The majority of students reach the school via taxi or school minibus, and roadworks may create diversions or delays which would lengthen their journey times. Some students already travel substantial distances from outside of Gloucestershire and any increase in their journey times may result in their commute to the school becoming unsustainable. This would be detrimental to the students affected and also result in financial loss for the school if it resulted in students surrendering their places at the school.</p> <p>The scheme is approximately 850m from the college site. Best practise noise pollution mitigation techniques will be employed throughout construction to ensure the noise pollution impacts are reduced as much as possible.</p> <p>The college have been engaged with throughout the development of the scheme design and have raised concerns; they will continue to be engaged with as the scheme progresses.</p>
	<b>X</b>			<p><i>Operational Phase: permanent increase in user safety</i></p> <p>By improving the capacity and resilience of the A417, the scheme aims to reduce rat-running through local villages and therefore reduce interaction between WCHs and vehicles. Stakeholders indicate that villages like Cowley, Birdlip and Coberley all experience increased traffic as motorists attempt to circumvent tailbacks on the A417. A WCH Technical Working Group was also set up to collect evidence and discuss options for improving recreational pedestrian access.</p> <p>Disabled people are over represented amongst pedestrian groups<sup>34</sup>, meaning that they are likely to be more sensitive to changes to pedestrian access than</p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				<p>other groups. Therefore, a reduction in village traffic may disproportionately benefit this group, as well as improving general WCH safety.</p> <p>The WCH network would also be improved by the scheme. Within the AONB there have been improvements to PRow and recreational routes for WCHs, including disabled users which enhance the area's special qualities. There is now the provision of two traffic free crossings over the A417 at the Cotswold Way crossing and Gloucestershire Way crossing. Further improvements include linking up Dog Lane with Cold Slad Lane, providing safe crossing points at Ullenwood junction, the Grove Farm underpass and the provision of the Air Balloon Way along much of the repurposed A417.</p>
	<b>X</b>			<p><i>Operational Phase: permanent improvements in air quality</i></p> <p>Evidence from DEFRA<sup>35</sup> indicates that people with lung or heart conditions are at an increased risk of becoming ill and needing treatment when levels of air pollutants rise. Older people are more likely to have heart and lung conditions which can be exacerbated by high levels of air pollution<sup>36</sup>. Currently, an AQMA is located at the Air Balloon roundabout, which indicates that NO<sub>2</sub> levels exceed national annual levels. Therefore, long-term measures to reduce congestion and increase vehicle speeds on the A417 are likely to have a differential beneficial impact on older people living locally who experience respiratory problems<sup>37</sup>.</p> <p>Moreover, the scheme design moves traffic away from local sensitive receptors, in particular those receptors in the existing Birdlip AQMA. By moving traffic away from receptors, it allows a greater distance over which pollutants can disperse meaning air quality during operation will improve for local sensitive receptors. In addition, stakeholders have stated that the scheme is likely to reduce congestion from slow-moving HGVs on Crickley Hill which will improve the air quality of the surrounding area and therefore benefit disabled people who are potentially more affected by reduced air quality (depending on their disability). A high proportion of students (nearly 30%) at National Star College live with cerebral palsy, some of whom have chronic lung disease.<sup>38</sup> Other students live with asthma and allergies. Improvements in air quality would likely have a disproportionately beneficial effect for these individuals.</p>
	<b>X</b>			<p><i>Operational Phase: permanent improvements to views</i></p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				Woodland planting has been used to integrate the attenuation basins at Ullenwood junction, within the grounds of National Star College and screen the new junction from sensitive users of the college. New woodland provides visual and physical connective with Ullenwood ancient woodland.
Race			<b>X</b>	No disproportionate or differential impacts associated with this protected characteristic have been identified.
Sexual Orientation			<b>X</b>	No disproportionate or differential impacts associated with this protected characteristic have been identified.
Gender Reassignment (Incl. Transsexual and Transgender)			<b>X</b>	No disproportionate or differential impacts associated with this protected characteristic have been identified.
Pregnancy & Maternity		<b>X</b>		<p><i>Construction Phase: temporary changes to air quality</i></p> <p>Maternal exposure to air pollution can affect the growth and development of unborn babies and can lead to premature birth and low birth weight<sup>39</sup>. The scheme has the potential to increase levels of air pollution during the construction phase, which may impact on expectant mothers living locally. Best practice construction dust control measures and standard mitigation measures will minimise the risk of adverse impacts on sensitive receptors, such as pregnant women.</p>
	<b>X</b>			<p><i>Operational Phase: permanent improvements in air quality</i></p> <p>Long-term measures to reduce congestion and increase vehicle speeds on the A417 are likely to have a differential beneficial impact on expectant mothers living locally.</p> <p>In addition, the preliminary scheme design moves traffic away from local sensitive receptors, in particular those receptors in the existing Birdlip AQMA. By moving traffic away from receptors, it allows a greater distance over which pollutants can disperse meaning air quality during operation will improve for local sensitive receptors, such as expectant mothers.</p>

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
				In addition, stakeholders have stated that the scheme is likely to reduce congestion from slow-moving HGVs on Crickley Hill which will also improve the air quality of the surrounding area.
Marriage & Civil Partnership			<b>X</b>	No disproportionate or differential impacts associated with this protected characteristic have been identified.



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

<p><b>No</b></p>	
<p><b>Yes</b> <b>(Mitigating action shown in Section F)</b></p>	<p><b>Identified Risks:</b></p> <p><i>During construction</i>                  During the construction period, there is potential for access to facilities in the local area to be impacted. Such facilities include education facilities like National Star College (where journey times may be impacted). These facilities are places of importance to certain protected characteristic groups (particularly children and young people with disabilities), who have and will be engaged with before, during and after the construction period to determine appropriate travel plan mitigation.</p> <p>There is potential for a temporary decrease in air quality throughout the construction period due to emissions of construction dust and particulate matter. This is likely to disproportionately negatively impact some groups, including children, older people and disabled people. An increase in noise pollution may also arise, negatively impacting children. Noise monitoring during construction in sensitive locations should be considered.</p> <p>Temporary changes in road layout will be apparent throughout the construction period. Such changes may negatively disproportionately impact older people.</p> <p>Changes to pedestrian access are likely to be apparent throughout the construction period. Such changes are likely to negatively disproportionately impact some groups, including children and women.</p> <p><i>During operation</i>                  Throughout operation, there is potential for negative impacts on some people from protected characteristic groups living in close proximity to the scheme. The scheme has the potential to improve air quality locally. This is likely to disproportionately positively impact certain groups living in the immediate area, such as children, older people, disabled people and unborn babies. However, there is potential for poor air quality to worsen regionally, due to additional traffic on the route. This may have disproportionate negative impacts on groups identified as being more</p>

	<p>susceptible to changes in air quality levels in the wider region.</p> <p>Permanent changes in road layout will be apparent because of the scheme. Such changes may both negatively (reduction in driver confidence) and positively (improved driver safety) impact older people.</p> <p>Permanent changes to pedestrian safety are likely to be apparent because of the scheme, such as the proposed overbridges and underpass with WCH access. Such changes are likely to positively impact some groups, including children, disabled people and women.</p>
<p><b>E: Options: The rationale behind the decision reached.</b></p>	
<p><b>E1: Proceed with the policy/practice because:</b></p> <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>	
<p><b>E2: Make adjustments</b></p> <ul style="list-style-type: none"> <li>○ to demonstrate how activities will lead to a fair outcome (Ensure further evidence is gathered to ensure any barriers are removed and referenced in Sections F and G)</li> </ul>	<p><b>X</b></p>
<p><b>E3: Withdraw it because there is obvious detriment</b></p> <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**

### **Desk-based research and demographic analysis**

Desk-based research was undertaken to explore the relevant aspects of the scheme in relation to potential equality impacts. This involved using secondary research from sources including published equality literature. The use of secondary research has been referenced within the assessment text above. During this process, potential effects (both positive and negative) and potentially affected groups were identified for both the construction and operation stages. This information was cross-referenced with the information relating to the A417 Missing Link scheme to ensure it reflected the specific conditions of the site.

A socio-demographic profile of the area was developed to further understand the equality context for the delivery to the scheme. For each characteristic protected under the Equality Act, available data was collected for the Cotswold Local Authority and, for comparison, at the national level.

### **The EDIT Tool**

The Equality, Diversity and Inclusion Tool (EDIT) is designed to enable Highways England to fulfil its duties under the *Equality Act 2010*, including ensuring the Strategic Road Network is accessible and that economic and social opportunities are maximised for all visitors. The Tool guides the user through a series of questions designed to enable them to make an informed decision about how EDI are relevant to the scheme. The Tool uses information about the scheme, local population data, equality research and any other relevant evidence to identify whether the scheme is likely to have an impact on EDI and any actions needed to address this.

The EDIT tool was used to identify areas with high densities of population, vulnerable groups, and travel destinations in the scheme area, providing an understanding of the extent to which various aspects of the A417 Missing Link scheme might affect equality groups.

The tool was used to consider the specific need of different equality groups in relation to the scheme. The Stage 3 EDIT assessment produced an overall score of 71%, indicating that equality, diversity and inclusion issues are likely to arise during the delivery of the scheme. A copy of the Stage 3 EDIT assessment is provided in Appendix B.

Within the EDIT tool, Sections 2 (Scheme Information), 3 (Design Information) and 5 (Construction Effects) provide further evidence for these elements and highlight the following main points:

- Trip attractors include the Crickley Hill Country Park and the wider AONB with the Cotswold Way National Trail, which currently crosses the Trunk A Road and would be diverted with a grade separated crossing with the scheme
- There are a small number of residential properties situated in close proximity to the scheme (with details presented within ES Chapter 12 Population and Human Health (Document Reference 6.2)). Two properties would require demolition and others are subject to appropriate mitigation given the identified likely effects
- Bus services do not currently utilise the route but have the right to do so and may do in the future. The scheme would reduce congestion, improve safety and enhance

<p>the PRow and WCH network in the area. This would improve access and travel conditions for all</p> <ul style="list-style-type: none"> <li>• Provision for WCHs would be made as part of new crossings and routes as detailed in ES Chapter 12 Population and Human Health (Document Reference 6.2) and ES Appendix 2.1 EMP Annex F PRow Management Plan. Overall the network for pedestrians would be enhanced as part of the new or diverted routes.</li> </ul>	
Activities to address any potential negative impacts or risks to deliver positive impacts	Provide activity completion dates
<p>Recommendations for activities, during construction and operation, to address any potential negative impacts or risks are outlined below:</p> <p>Construction</p> <ul style="list-style-type: none"> <li>• National Star College have been engaged with throughout the development of the scheme design. They will continue to be engaged with as the scheme progresses to ensure their concerns around temporary noise and air quality impacts on their students are considered.</li> <li>• A clear plan of how access to community facilities (particularly National Star College) will be maintained throughout the construction period should be put in place and presented to these facilities. These access routes should be appropriate, maintain required safety standards, and minimise disruption.</li> <li>• When work is required that affects the Existing A417 and its side roads, a series of traffic and WCH route management measures will be implemented, and these will be provided in further detail. Any diversion routes would be clearly marked and signed during these periods and adequate notices would be given to road users and local residents via press notices and local newsletter distributions to be agreed with Gloucester County Council as appropriate, thereby helping mitigate impacts associated with driver uncertainty.</li> <li>• Where access is affected to private properties and businesses, temporary alternative access would be provided as appropriate, to be agreed with the landowner and/or tenant(s) as necessary</li> <li>• ES Appendix 2.1 EMP Annex F PRow Management Plan (Document Reference 6.4) will be provided alongside the ES (Document Reference 6.2) which will detail planned temporary and permanent closure of PRows, temporary and permanent diversions and provision of new crossings/routes as part of the scheme.</li> <li>• Best practice construction methods would seek to minimise if not avoid indirect temporary effects on users of WCH routes, for example with dust suppression methods of construction.</li> <li>• Clear, consistent and well-lit signage should be used to support wayfinding and alleviate any stress or confusion caused to drivers (particularly older people). Stakeholders indicated that diversions should be marked from Cirencester. This should be</li> </ul>	<p>Ongoing</p>

<p>the case throughout the construction period and for a suitable amount of time when the scheme initially opens.</p>	
<p>Operation</p> <ul style="list-style-type: none"> <li>• Promotion of access rights along Dog lane and Cold Slad Lane for WCH users to improve connectivity to the Country Park and beyond, helping reduce the need for residents in Brockworth and its planned developments to travel by car</li> <li>• Off-carriageway and segregated provision for WCH including along the Existing A417, to encourage active travel to community facilities including those in Birdlip</li> <li>• Safe crossings of new roundabouts and slip roads (e.g. A436)</li> <li>• Conversion of parts of the Existing A417 into a restricted byway accessible by WCH, including vulnerable user groups such as disabled people</li> <li>• Reduce movements at Cowley Junction to help reduce rat-running and impacts of traffic on residents in Cowley and Brimpsfield.</li> </ul>	
<p><b>Summary of the findings, including details of consultation with communities/customers/groups/stakeholders/staff/professional organisations. Explain how this has shaped the development of the practice or policy:</b></p> <p>In summary, the embedded mitigation measures detailed in the ES (Document Reference 6.2) and accompanying documents, together with the recommendations outlined above, will provide benefits to, and help minimise any adverse impacts upon, groups with protected characteristics by the scheme.</p>	
<p><b>Where available and appropriate – photographic evidence or link.</b></p> <p><b>E.g. successful installation of footbridges, shared footpaths, letters of appreciation, commendation received etc.</b></p> <p><b>(For Highways England internal records)</b></p> <p>ES Appendix 2.1 EMP Annex F PRow Management Plan (Document Reference 6.4) sets out the provision within the scheme for walking, cycling and horse riding, including disabled users. That Plan sets out that “Where PRowS would be stopped up for construction and subsequently reinstated, a condition survey would help ensure that any reinstated route would be of similar or better quality.</p>	
<p><b>Where appropriate - Link to evidence of communication/inclusion action plans, environmental assessments or EDIT exercises.</b></p> <p><b>(For Highways England internal records):</b></p> <p>The EDIT Tool used for the assessment can be found in Appendix B.</p> <p>The Buildings Accessibility Checklists (this is relevant only to the first round of consultation in 2019 as the consultation in 2020 was virtual).</p>	

**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.**

Best practice construction stage mitigation monitoring will be undertaken and reviewed at regular intervals throughout the construction period.

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

Completion of table below to be reviewed during the next stage.

Monitoring Action	By Whom	By When

**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).**

**(This does not have to be a physical signature but approval is required)**

Name	Date
Job Title	

**In submitting this EqIA the SRO/PDD has:**

- **Approved all activity including monitoring actions**
- **Submitted documentation to the [REDACTED] quality assurance and registration.**
- **For all MP schemes please contact [MP Representative for the Highways England Diversity Group](#)**
- **Considered the documentation as robust and suitable for publication**
- **Checked that the documentation is saved in the EqIA area of the internal filing system and is retained as a record as part of good governance.**

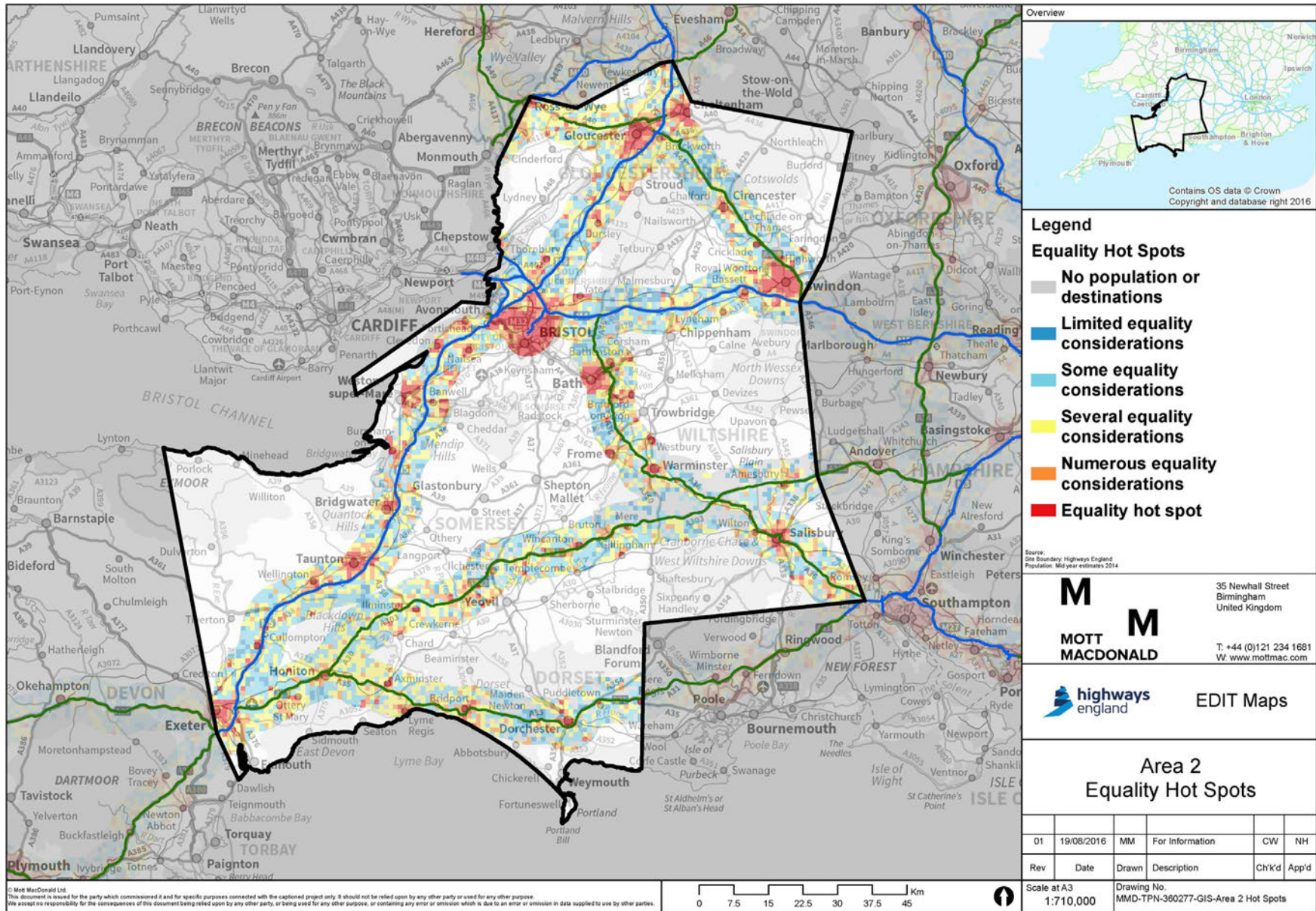
# Appendices



# Appendix A Equality Hotspot Maps

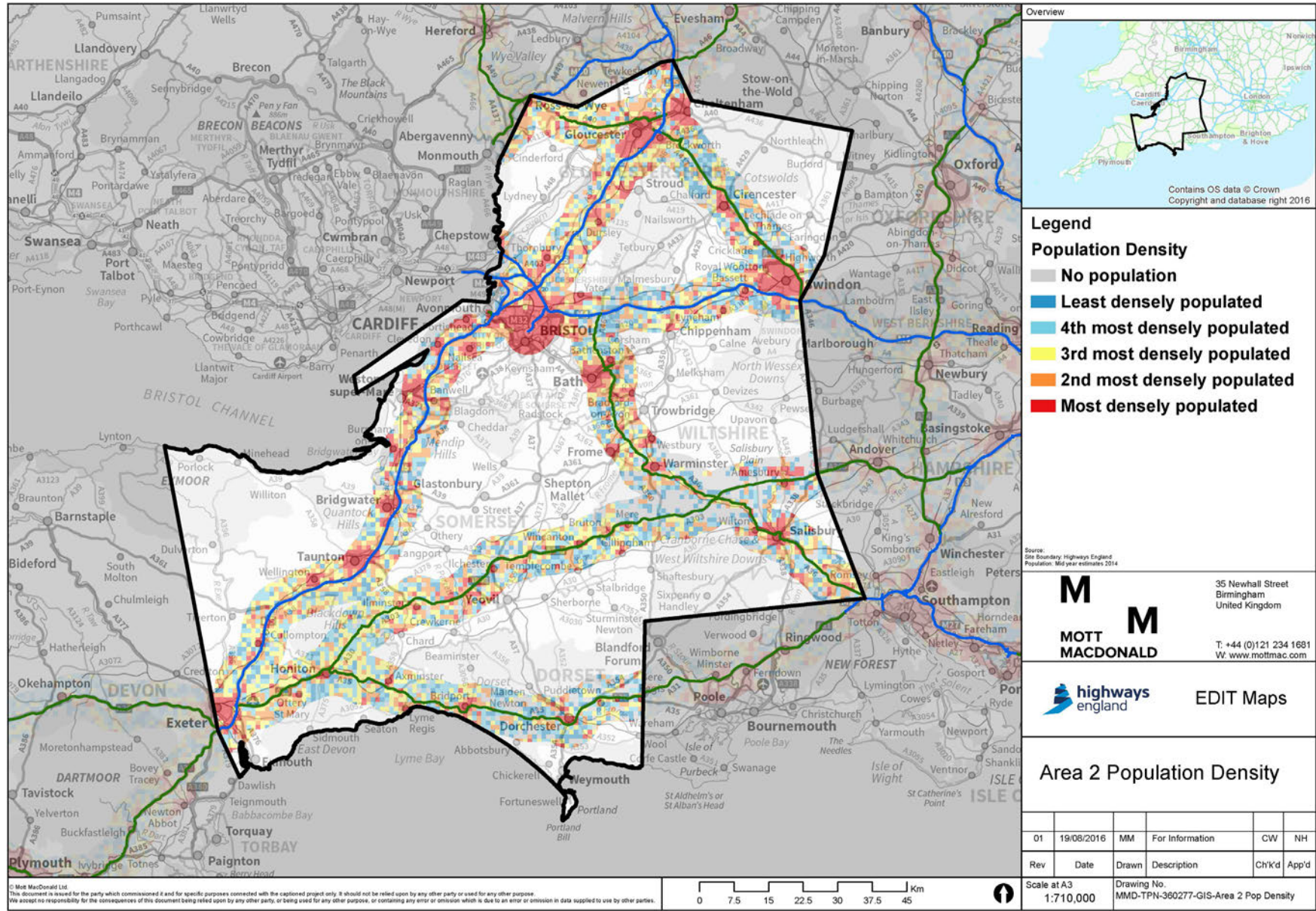
- A.1 Area 2: Equality Hot Spots**
- A.2 Area 2: Population Density**
- A.3 Area 2: Equality Group Density**
- A.4 Area 2: Equality Group Proportions**
- A.5 Area 2: Destinations**

# Area 2 - Equality Hot Spots





# Area 2 - Population Density



**Legend**

**Population Density**

- No population
- Least densely populated
- 4th most densely populated
- 3rd most densely populated
- 2nd most densely populated
- Most densely populated

Source: Ordnance Survey, Highways England  
Population: Mid year estimates 2014

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**highways england** EDIT Maps

**Area 2 Population Density**

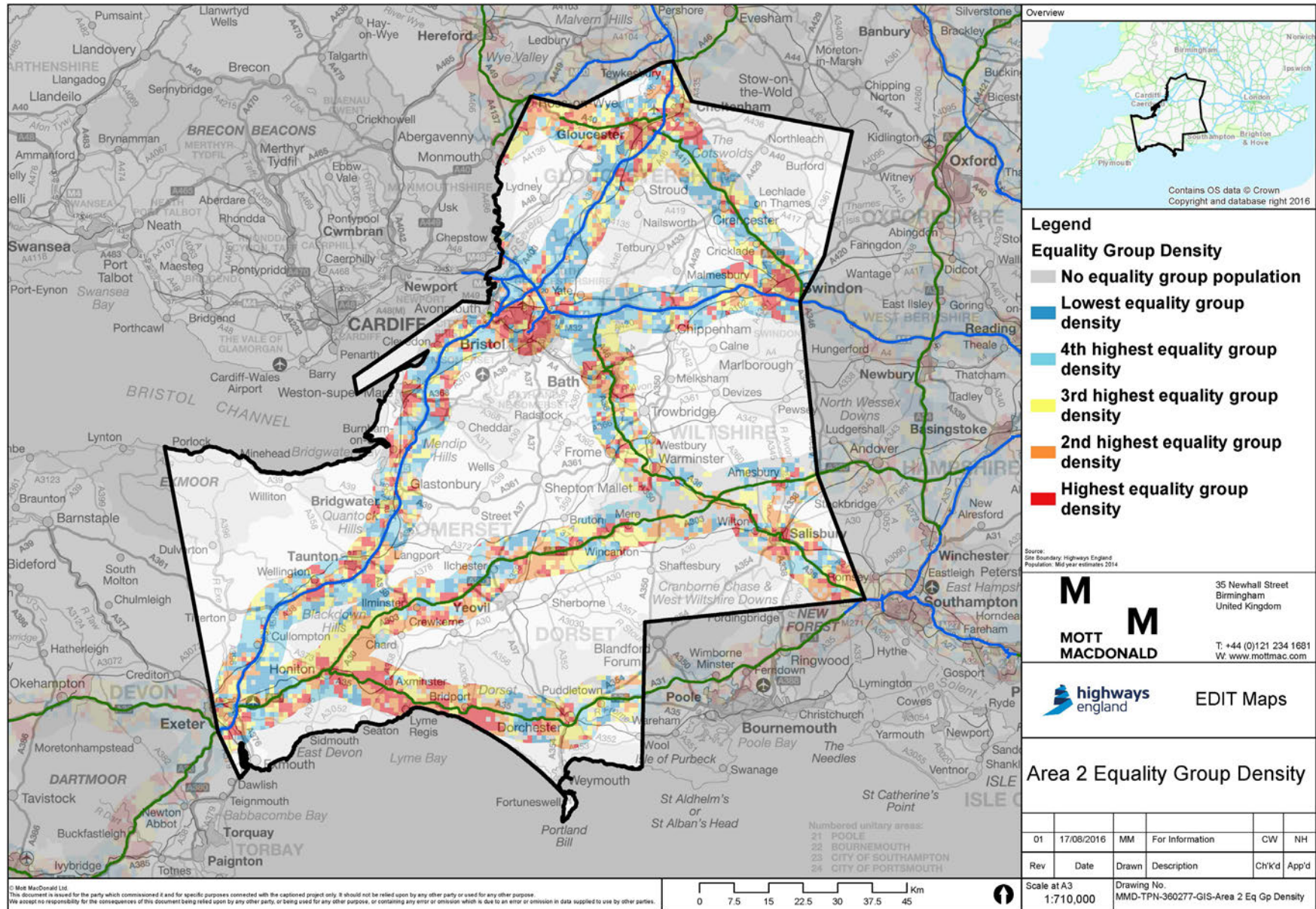
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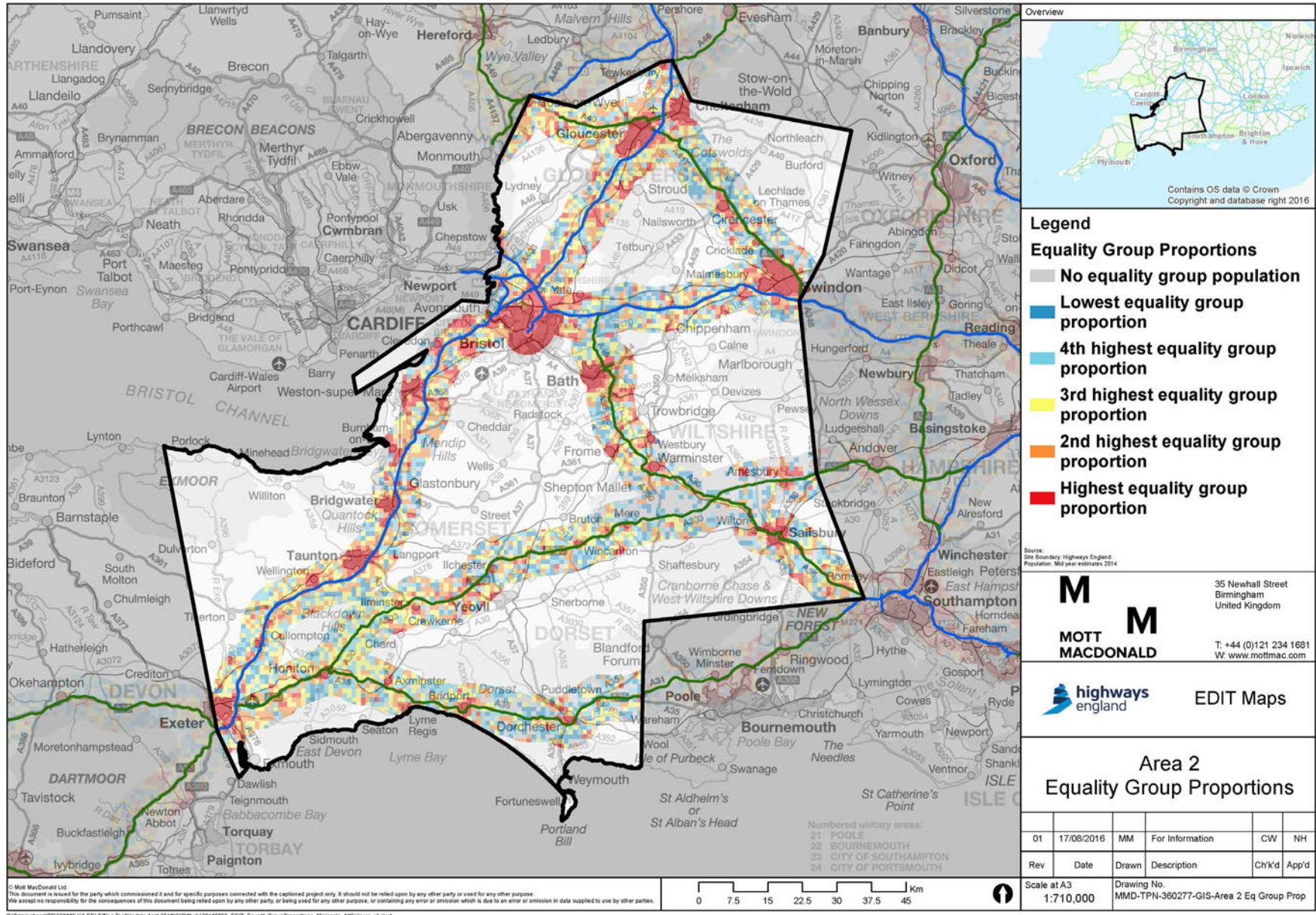


# Area 2 - Equality Group Density



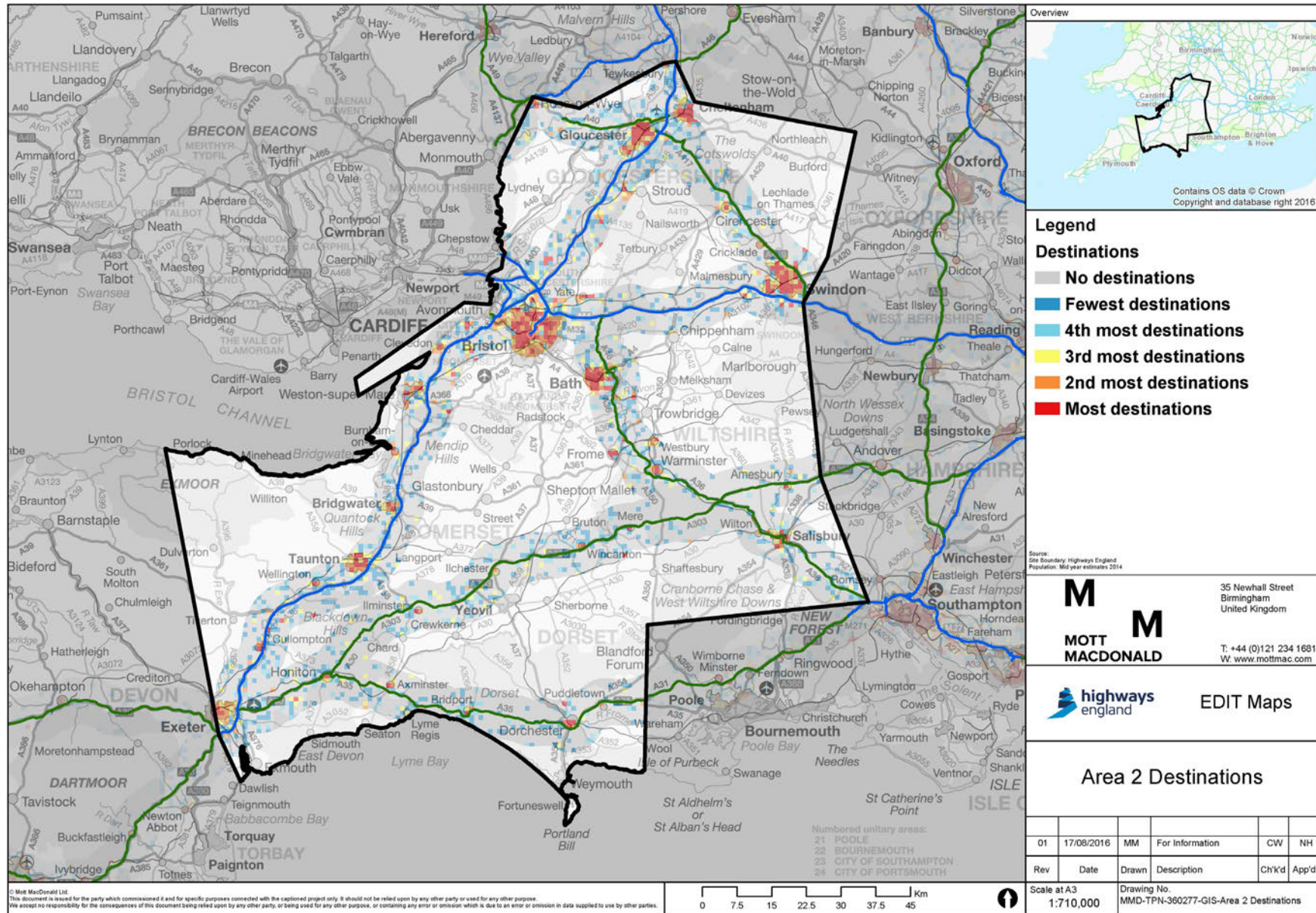


# Area 2 - Equality Group Proportions





# Area 2 - Destinations



# Appendix B EDIT Tool

# E-D-I-T

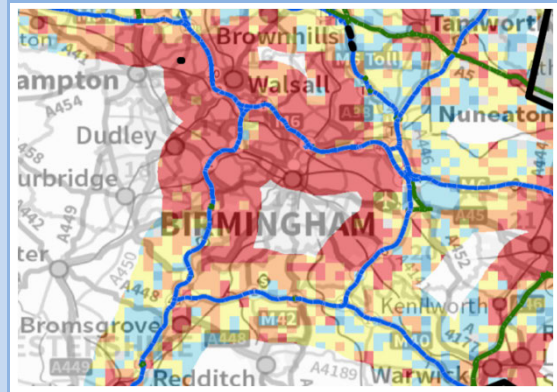
## Equality, Diversity and Inclusion Tool

Prepared by Mott MacDonald on behalf of Highways England

### About EDIT - the Equality, Diversity and Inclusion Tool

#### Why do I need to use EDIT on my scheme?

- In England and Wales the **Equality Act 2010** means that considering equality as part of service delivery is required by law.
- Highways England has duties under the Act to ensure that the Strategic Road Network (SRN) is **accessible**, and that economic and social **opportunities** are maximised for all users.
- The **Equality, Diversity and Inclusion Tool (EDIT)** is designed to help you - Highways England project teams - to make an informed decision about how equality, diversity and inclusion (EDI) are relevant to your project.
- EDIT uses information about your scheme, local population data, equality research and any other evidence you may have, to identify whether your scheme is likely to have an **impact** on EDI and what **action** you might need to take to address this.
- EDIT provides an **evidence base** which can help you to make the right decision about how to maximise the benefits of your scheme for all Highways England's customers and the local communities affected by what we do.



#### Which schemes should I use EDIT on?

##### In Major Projects

- EDIT should be used on all schemes as part of the **Equality Impact Assessment (EqIA)** PCF product. Complete EDIT during the Equality Impact screening process and again during the full assessment in Project Control Framework (PCF) stages 1 and 3 as a minimum. EDIT can also add value during the construction stage.

##### In Operations

- EDIT should be used on schemes likely to have an impact on EDI. Use of EDIT for **improvement** schemes, funded via the Designated Funds or as part of delivery of RIS1 and 2, is strongly recommended as these are most likely to have EDI implications, though **asset maintenance** and **renewal** schemes may benefit from the use of EDIT.

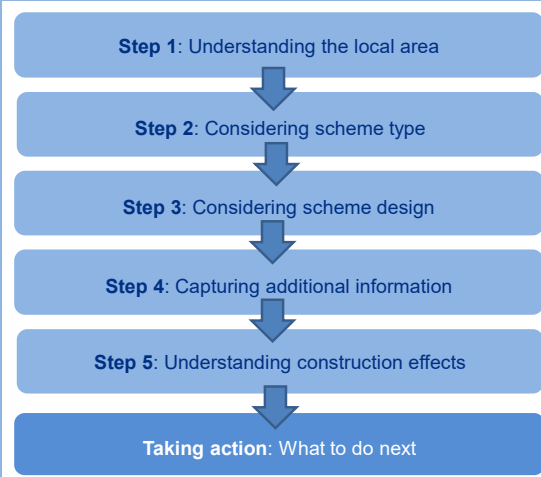
##### On all schemes

- Consult with your scheme's **Senior Responsible Owner** and **Diversity Representative** if you are unsure about whether to use EDIT, or at what point in the project process it should be applied.
- We have produced a separate guidance note to help guide you through the use of EDIT and the EqIA process in Major Projects - this can be found on SHARE and the supplier portal alongside the EqIA and EDIT materials.

#### What does EDIT involve?

##### EDIT involves five steps:

- Step 1 involves an initial review of your scheme using a series of specially-designed EDI **'hotspot' maps**, included in a separate booklet.
- The maps include a single EDI look-up (or 'hotspot') map of the SRN, supported by four further maps covering population, equality and destination data. The maps are designed to allow you to 'zoom in' on the local area of your scheme to understand the factors which may indicate that EDI issues need further consideration.
- Steps 2, 3, 4 and 5 involve an assessment of the different aspects of the scheme to identify in more detail whether EDI is relevant and how.
- The four steps (each one represented by a tab in this Excel workbook) include a range of questions covering details about your scheme, relevant design considerations, and the potential construction effects associated with delivery.
- The steps also include opportunities to capture existing evidence from other assessments or consultation activity being undertaken.
- The assessment process generates a score identifying the extent to which EDI is relevant to your scheme. The score is linked to a number of signposts on what to do next.



#### How do I get started?



1. Begin by completing the 'spatial assessment' on tab one, using the 'hotspots' mapping booklet for your area. **This will provide you with local social and demographic evidence relevant to your scheme.**
2. Continue through the tool answering the questions on each tab in turn, making any relevant notes as you need to. **Certain selections you make will limit the options available in the tool, particularly around the location of the scheme.**
3. The remainder of the tool asks straightforward questions about the type of scheme, specific design features, assessment and consultation work already undertaken, and construction considerations. Answer all the questions that are applicable by clicking the most appropriate button. **Leave any questions that you cannot answer or do not apply as 'unknown' - these will not affect your EDIT score.**
4. Once you have your EDIT score, **further information is available on the 'Next steps' tab**, highlighted in green on the worksheet tabs below.
5. **You will need to update your EDIT document throughout the project life cycle.** There is a sign-off and version control section on the summary page that should be completed following each revision, which could be undertaken in line with the PCF in Major Projects or the Design Gateway process within OD projects, for example:
  - When assessing and prioritising scheme need (for example as part of the Value Management process)
  - During project design and planning
  - During the construction review process (as part of project delivery)

### Some hints and tips

- \* The user groups below are those included within the Equality Act 2010, non-motorised users, and those groups that tend to experience disadvantage in terms of transport. **These should be kept in mind when using the tool.**
- \* You will see the 'ⓘ' symbol throughout the tool - hover over these with your cursor for more information.
- \* Most of the questions require you to select your answer by **clicking the button** 'yes', 'no', or 'unknown' if you do not know the answer. However, some of the questions use **drop-down menu** selections - just look for the downward arrow next to the response boxes, click and make your selection.
- \* Consider both your scheme in its current form, and realistic options and alternatives. **This does not mean consider options that are way beyond the budgetary or other constraints in which you are working. Simply consider those design features that could be added to enhance your scheme, if you know of any.**

### Who should I be thinking about?

EDIT is intended to help you identify whether your scheme is likely to have an impact on a range of different user groups, this includes people with characteristics protected under the Equality Act 2010, other groups who would potentially experience disadvantage, and other non-motorised users. These are detailed below:

#### People with characteristics protected under the Equality Act 2010

<p><b>Age</b></p> <ul style="list-style-type: none"> <li>• Children (aged under 16)</li> <li>• Younger people (aged 16-24)</li> <li>• Working age people (aged 16-64)</li> <li>• Older working age people (age 55 and over)</li> <li>• Older people of retirement age (age 65 and over)</li> </ul>	<p><b>Disability</b></p> <ul style="list-style-type: none"> <li>• Mobility impairments (e.g. wheelchair users)</li> <li>• Sensory impairments (e.g. blind, deaf)</li> <li>• Learning disabilities</li> <li>• Mental wellbeing disabilities</li> <li>• Serious illness (e.g. cancer, AIDS)</li> </ul>	<p><b>Gender reassignment</b></p> <ul style="list-style-type: none"> <li>• People who consider themselves to be transgender</li> <li>• Anyone at any stage of gender reassignment</li> <li>• Holders of gender recognition certificate</li> </ul>	<p><b>Marriage and Civil partnership</b></p> <ul style="list-style-type: none"> <li>• People who are married</li> <li>• People who are in a civil partnership</li> <li>• People who are single (unmarried, divorced, widowed)</li> </ul>
<p><b>Pregnancy and maternity</b></p> <ul style="list-style-type: none"> <li>• Women who are pregnant</li> <li>• Women who are on statutory maternity leave (up to six months after their baby is born)</li> <li>• Women with very young children</li> <li>• Breastfeeding mothers</li> </ul>	<p><b>Race and ethnicity</b></p> <ul style="list-style-type: none"> <li>• People from Black and Minority Ethnic communities (BAME)</li> <li>• White British and Non White British people</li> <li>• Different BAME categories (e.g. black people), and sub-categories (e.g. Black Caribbean people)</li> </ul>	<p><b>Religion and belief</b></p> <ul style="list-style-type: none"> <li>• People from religious groups</li> <li>• People from minority faiths (such as Buddhism, Hinduism, Judaism, Islam and Sikhism)</li> <li>• Christians</li> <li>• People with no religion and atheists</li> </ul>	<p><b>Sex / gender</b></p> <ul style="list-style-type: none"> <li>• Men</li> <li>• Women</li> </ul>
<p><b>Sexual orientation</b></p> <ul style="list-style-type: none"> <li>• Heterosexuals</li> <li>• Lesbian, gay and bi-sexual people (LGB)</li> </ul>			

#### Other groups who would potentially experience disadvantage

<p><b>Poverty</b></p> <ul style="list-style-type: none"> <li>• People living in income deprived areas</li> <li>• People living in employment deprived areas</li> </ul>	<p><b>Accessibility</b></p> <ul style="list-style-type: none"> <li>• People living in access deprived areas</li> </ul>	<p><b>Health inequality</b></p> <ul style="list-style-type: none"> <li>• People living with a Long Term Limiting Illness (LTLI)</li> <li>• People claiming Disability Living Allowance</li> <li>• People from health deprived areas</li> </ul>	<p><b>Rural communities</b></p> <ul style="list-style-type: none"> <li>• People living in areas defined as very rural or predominantly rural</li> </ul>	<p><b>Car ownership</b></p> <ul style="list-style-type: none"> <li>• People living in households without a car</li> </ul>
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#### Other non-motorised and vulnerable users

<p><b>Pedestrians</b></p> <ul style="list-style-type: none"> <li>• People travelling on foot</li> <li>• Including disabled pedestrians</li> <li>• People using footpaths or public rights of way</li> </ul>	<p><b>Cyclists</b></p> <ul style="list-style-type: none"> <li>• People travelling by bicycle</li> <li>• People using cycle routes, cycle paths, or the National Cycle Network</li> </ul>	<p><b>Equestrians</b></p> <ul style="list-style-type: none"> <li>• People travelling by horse</li> <li>• People using bridleways</li> </ul>
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**EDIT - Equality, Diversity and Inclusion Tool**

**Step 1: Equality 'hotspot' mapping assessment**

About your project

Record the key details of your project in the boxes below.

1.1	Project number / code:	268053-79
1.2	Project title:	A417 Missing Link
1.3	Project manager:	Mike Goddard (Highways England), Senior Project Manager
1.4	Contact Email: Telephone:	[Redacted]
1.5	Project directorate:	Major Projects (MP)
1.6	Project stage:	PCF Stage 3
1.7	Project type:	TBC
1.8	Project cost range:	TBC

Equality hotspot assessment

1.9	Highways England Area:	2	1.10	Scheme location:	Gloucestershire
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Consider the map booklet for your area, and using the colour code below select a score from 0 to 5 from the drop down menu. If your scheme covers a large area, long distance, or falls between a number of different areas, use your own judgement as to the most appropriate score.

*(NOTE: The maps are available to view separately in PDF booklet format and accompany this Excel tool).*

For each Highways England Area five maps are available:

1. An equality 'hotspot' map - which shows those parts of the Area with concentrations of all of the above - people, equality groups and destinations.
2. A population map - which shows those parts of the Area with the largest numbers of people.
3. An equality map - which shows those parts of the Area with the largest numbers of people from particular groups.
4. An equality map - which shows those parts of the Area with the highest proportions of people from particular groups.
5. A destinations map - which shows those parts of the Area with the highest numbers of destinations such as schools, hospitals, religious buildings and care homes.

The colour coding on the maps is as follows:

Colour	Description	Score to input
Red	A 'hotspot' area.	5
Orange	High number / proportions	4
Yellow	Medium number / proportions	3
Light Green	Low number / proportions	2
Dark Green	Very low number / proportions	1
Grey	No population or destinations	0

1.11	Using the equality 'hotspot' map: Does the scheme fall within or near to an equality 'hotspot'?	2	The scheme is within the Cotswolds AONB and, as such, qualifies as an 'attractor or destination' in the local area.
1.12	Using the population map: Does the scheme fall within or near to a densely populated area?	3	
1.13	Using the equality numbers map: Does the scheme fall within or near to an area with a high number of people from equality groups?	2	
1.14	Using the equality proportion map: Does the scheme fall within or near to an area with a high proportion of people from equality groups?	3	
1.15	Using the destinations map: Does the scheme fall within or near to an area with a high density of trip attractors?	1	
1.16		Are there any large, seasonal, temporary attractors or destinations in the local area of your scheme?	Yes No Unknown

You can get a data snapshot of the local area of your project - including population breakdown, the economy and other information - from the following locations:

You can look up local demographic data on 'Neighbourhood Statistics' here: [ONS](#)

You can look up local economic data on 'nomis' here: [nomis](#)

Step 1 Score:

**51%**

Step 1 is complete, click here to proceed to Step 2

**EDIT - Equality, Diversity and Inclusion Tool**

**Step 2: Considering scheme type**

**Main effects of the scheme**

	Yes	No	Unknown	
2.1 Does the scheme involve reorganisation of the built environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The scheme will involve widening an existing section of road and creating a new section of road. The scheme will also involve re-purposing an existing section of road to provide a new route for walkers, cyclists and horse riders. This will have a variety of effects, reported in Chapter 12 Population and Human Health (Document Reference 6.2). These include improved access and reduced community severance overall, especially for walking, cycling and horse riding with new
2.2 It the scheme likely to impact upon community severance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.3 Are there likely to be disproportionate effects on those without access to a car?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.4 Will the scheme impact upon the mobility of non-motorised users?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.5 Will the scheme increase levels and speed of traffic ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.6 Will the scheme impact upon the distance between people and traffic?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Primary beneficiaries**

Do the primary beneficiaries of the scheme include any of the following:		Yes	No	Unknown	
2.7 Drivers and their passengers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reduced traffic congestion and reduced community severance with new crossings and routes for all will benefit all these beneficiaries.
2.8 Public transport users?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.9 Pedestrians?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.10 Cyclists?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.11 Equestrians?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.12 Mobility impaired pedestrians?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Key asset: Motorways**

	Yes	No	Unknown	
2.13 Is the scheme located entirely on a motorway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Motorways</b>				
2.14 Is the scheme likely to have an impact on safety or perceptions of safety of the motorway environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please provide any relevant details or notes here
2.15 Will the scheme impact upon users ability to leave their vehicle independently or safely?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.16 Will the scheme impact upon ease of use and accessibility of emergency roadside telephones (ERTs)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.17 Will the scheme result in changes to the speed, average likely speed or speed limit on the section of motorway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.18 Will the scheme impact upon the level of information available on the motorway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Managed / smart motorways</b>				
2.19 Is the scheme a smart motorway scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please provide any relevant details or notes here
2.20 Will the scheme result in temporary or partial loss of the motorway hard shoulder?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.21 Will the scheme increase the distance between refuge areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Key asset: Trunk A Roads**

	Yes	No	Unknown	
2.22 Is the scheme located entirely on a Trunk A Road?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Trunk A-Roads</b>				
2.23 Does the location of the scheme include residential areas immediately adjacent to the carriageway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There are a small number of residential properties situated in close proximity to the scheme, with details presented within Chapter 12 Population and Human Health (Document Reference 6.2). One will require demolition and others are subject to appropriate mitigation given the identified likely effects. Trin attractors include the Cricklev Hill Countrv Park and its
2.24 Does the location of the scheme include particular relevant trip attractors in close proximity to the carriageway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.25 Does the scheme include sections of road used as an alternative to motorway travel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.26 Does the location of the scheme incorporate public transport usage?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Area type: Rural and Urban Areas**

	Rural	Urban	Both	
2.27 Is the scheme located primarily in a rural area, an urban area or combination of both?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Rural areas</b>				
2.28 Will the scheme affect public transport access for people living in rural areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The scheme would reduce congestion, improve safety and enhance the public rights of way and walking, cycling and horse-riding network in the area. This would improve access and travel conditions for all.
2.29 Will the scheme affect the visibility of NMUs using rural roads?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.30 Will the scheme affect the accessibility of key services in rural areas?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.31 Will the scheme have an impact on the accident profile of the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.32 Will the scheme impact upon NMU infrastructure (pavements, cycle lanes etc.) in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.33 Will the scheme have a disproportionate effect on young people in rural areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Urban areas</b>				
2.34 Will the scheme have disproportionate effect on people living in urban areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Please provide any relevant details or notes here
2.35 Will the scheme impact upon access to green or open space?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.36 Is the scheme located in an areasof high deprivation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.37 Is the scheme located in an area with a high accident rate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Non-motorised user (NMU) impact**

	Yes	No	Unknown	
2.38 Does the scheme involve Public Rights of Way?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Details are provided in Chapter 12 Population and Human Health (Document Reference 6.2) and Appendix 12.2 Public Rights of Way Management Plan. In summary, the key impacts would include an enhanced diversion of the Cotswold Way National Trail to improve access and user experience, while the Gloucestershire Way Promoted Route of footnaths would be diverted with different at grade and
2.39 Does the scheme involve a Public Right of Way with equestrian rights?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.40 Does the scheme involve cycle routes, or is it used by cyclists?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.41 Will the scheme increase the length of NMU routes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.42 Can the safety of junctions, crossings or roundabouts be improved for NMUs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Step 2 Score:

**95%**

**High scoring areas:**  
Primary beneficiaries , Trunk A-Roads, Non-motorised user (NMU) impact  
**Low scoring areas:**

Step 2 is complete, click here to proceed to Step 3

**EDIT - Equality, Diversity and Inclusion Tool**

**Step 3: Considering scheme design**

**Footways**

	Yes	No	Unknown	
3.1 Will the scheme involve changes to footways (e.g. width)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Provision for walkers, cyclists and horse-riders would be made as part of new crossings and routes as detailed in the Chapter 12 Population and Human Health (Document Reference 6.2) and Appendix 12.2 Public Rights of Way Management Plan. Overall the network for pedestrians would be enhanced as part of the proposed new or diverted routes.
3.2 Will the scheme involve changes to kerbs (e.g. height)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.3 Will the scheme involve changes to footway gradient and level?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.4 Will the scheme involve use of tactile paving?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.5 Will the scheme permanently affect access to footways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.6 Does the scheme provide an opportunity to enhance the pedestrian environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.7 Are specific accessibility measures being included as part of the design? (please specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Crossings, footbridges and underpasses**

	Yes	No	Unknown	
3.8 Will the scheme result in changes to traffic levels or speed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Details are provided in the Chapter 12 Population and Human Health (Document Reference 6.2) and Appendix 12.2 Public Rights of Way Management Plan. In summary, the key impacts would include an enhanced diversion of the Cotswold Way National Trail to improve access and user experience, while the Gloucestershire Way Promoted Route of footpaths would be diverted with different at grade and grade separated choices for users north or south of its current alignment. Other footpaths, brideways and routes with public access to the route that are affected would be
3.9 Will the scheme change the number of crossings available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.10 Will the scheme change the means by which people cross?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.11 Will the scheme affect identified pedestrian desire lines or existing crossing routes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.12 Does the scheme involve the addition or removal of footbridges?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.13 Does the scheme involve the addition or removal of underpasses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.14 Can measures be implemented to improve the accessibility of the footbridge/underpass?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Street furniture and bollards**

	Yes	No	Unknown	
3.15 Will the scheme involve additional or changes to existing street furniture?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Benches will be included as part of the proposed scheme.
3.16 Will the scheme affect the location of street furniture?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.17 Can street furniture be combined as part of the design? (i.e. can lighting columns be set into grass verges? Can waste bins be combined with planters or seating?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.18 Will the scheme involve the addition or removal of bollards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Taxis**

	Yes	No	Unknown	
3.19 Will the scheme impact upon the location of taxi ranks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
3.20 Will the scheme impact upon access to existing taxi ranks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.21 If taxi ranks are relocated will they be situated at suitable drop off points near key services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Parking**

	Yes	No	Unknown	
3.22 Will the scheme change the location or affect the provision of and access to on-street parking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disabled parking is proposed near the where the Roman road meets the existing A417 as detailed in Chapter 2 The Project (Document Reference 6.2).
3.23 Will the scheme change the location or affect the provision of and access to disabled parking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.24 Will the scheme implement red routes, or other measures which prohibit disabled parking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.25 Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Covers and gratings**

	Yes	No	Unknown	
3.26 Will the scheme change the location of covers or gratings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
3.27 Will the scheme involve the addition of covers and gratings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Walking distances**

	Yes	No	Unknown	
3.28 Will the scheme affect walking distances between key local destinations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	New walking, cycling and horse-riding routes including the re-purposed A417.
3.29 Will the scheme change walking distance between residential areas and public services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.30 Do proposed walking routes include rest points such as benches?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Signage**

	Yes	No	Unknown	
3.31 Will the scheme change signed or natural / intuitive highways routes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Details of signage is to be agreed as set out in the Statement of Common Ground with the Joint Councils (Document Reference 4) and Appendix 12.2 Public Rights of Way Management Plan.
3.32 Will the scheme change signed or 'natural' pedestrian routes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.33 Will the scheme impact upon Public Rights of Way?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.34 Will the scheme change routes to key destinations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.35 Will the scheme disrupt way-finding?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Personal security, surveillance and lighting**

	Yes	No	Unknown	
3.36 Will the scheme change the location of street lighting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This would be a dark skies scheme given the location and there would be minimal lighting. CCTV is only present on roads for traffic.
3.37 Will the scheme lead to additional pedestrian routes or new roads where lighting should be considered?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.38 Does the scheme include provision for other personal security measures such as CCTV?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**Public Transport**

	Yes	No	Unknown	
3.39 Will the scheme change public transport routes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Bus stops along the route would be affected (although these are unused as Stagecoach buses have stopped using the route). Buses also have the right to use the route meaning although they do not do so at the moment, they may do in the future. A new bus stop is being provided for Birdio
3.40 Will the scheme change the location of bus stops?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.41 Will the scheme affect the accessibility of stops, stations or other public transport facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

- 3.42 Will the scheme impact upon existing interchange facilities?
- 3.43 Are measures proposed to enhance and support personal security?



school. Access to the service would be improved by new and diverted non-motorised routes.

Step 3 Score:

**75%**

**High scoring areas:**  
Footways, Walking distances  
**Low scoring areas:**  
Taxis, Covers and gratings

Step 3 is complete, [click here to proceed to Step 4](#)

**EDIT - Equality, Diversity and Inclusion Tool**

**Step 4: Capturing additional evidence**

**Scheme consultation, appraisal and assessment activity**

	Yes	No	Unknown		Yes	No	Unknown
4.1 Have <b>consultation</b> or other <b>public</b> or <b>stakeholder engagement</b> activities been undertaken as part of scheme development, options appraisal or similar?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.2 Has an <b>Equality Impact Assessment (EqIA)</b> or other form of <b>Equality Analysis</b> been undertaken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.3 Have <b>Social and Distributional Impact Appraisals</b> been undertaken in accordance with WebTAG Units A4.1 and A4.2?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.4 Has a <b>Health Impact Assessment (HIA)</b> been undertaken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.5 Has a <b>Non-motorised User (NMU)</b> audit been undertaken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.6 Has an <b>Environmental Statement</b> been prepared, or an <b>Environmental Impact Assessment (EIA)</b> been undertaken?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4.7 Has a <b>Strategic Environmental Assessment (SEA)</b> been undertaken?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.8 Has a <b>Sustainability Appraisal</b> been completed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

All activities have resulted in findings that are relevant to equality, diversity and/or inclusion.

**Relevant activity being undertaken by other bodies locally**

4.10 Is any other highways work being undertaken in the local area (for example by the <b>local highways authority</b> ) that is relevant to the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
N/A			
4.11 Is any of the work scheduled to be undertaken likely to contribute to the scheme's equality or community impact?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Step 4 Score:

**0%**

High scoring areas:  
Low scoring areas:

Step 4 is complete, click here to proceed to Step 5

**EDIT - Equality, Diversity and Inclusion Tool**

**Step 5: Understanding construction effects**

Likely construction effects

*NOTE: This step may not yet be applicable if you are early on in the delivery of your project.*

	Yes	No	Unknown
5.1 Are there likely to be any specific construction effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.2 Will vehicular access routes be temporarily affected by construction of the scheme?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.3 Will footpaths, public rights of way, or access routes be temporarily impacted by construction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.4 Will public transport routes be temporarily altered or service levels temporarily reduced by construction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.5 Will any community facilities (such as educational or healthcare facilities) be impacted by construction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.6 Will the full function of the facilities in question be impeded for any period during construction?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5.7 Will use of the facilities be temporarily disrupted due to construction noise, additional traffic or other construction activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.8 Will access to facilities be disrupted? If so, for how long? And will alternative access be provided?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.9 Will there be temporary land take from community facilities as a result of construction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Details are provided in the the Population and Human Health Chapter of the Environmental Statement, Public Rights of Way Management Plan and Traffic Management Plan both part of the EMP. Appropriate mitigation and diversions would be made during construction to minimise disruption for the duration of works. Common land and other open access land would be acquired for the scheme and exchange land has been identified.

Construction assessment and management processes

	Yes	No	Unknown
5.10 Has a construction impact assessment been undertaken for the scheme?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.11 Has a Code of Construction Practice (CoCP) been implemented for the scheme?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.12 Has a Construction Environmental Management Plan (CEMP) been implemented for the scheme?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.13 Does the CoCP or CEMP identify any measures designed to manage effects relevant to EDI?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Step 5 Score:

**77%**

High scoring areas:  
Low scoring areas:

Step 5 is complete. Your EDIT summary and score are on the 'Summary' tab. [Click here to view.](#)

**EDIT - Equality, Diversity and Inclusion Tool**

**Summary and sign-off**

What does this page tell me?

This sheet summarises the findings of the EDIT process. Your running totals from each of the previous sheets is summarised here alongside a summary of the process including:

- The key areas driving your score (where you have primarily answered positively or negatively)
- Any steps where the score is based on a low response rate (you have provide fewer than 50% of answer)
- Any area where you answers do not match previously entered information (where your responses within two separate steps are contradictory)

The sheet also provides a final space to make some further notes for each of the steps

Summary of: **Step 1: Hotspot identification and preliminary decision**

**Step 1 score** 51%

The outcome of the hotspot mapping exercise showed that your scheme is located in:  
An equality 'hotspot' area, An area of high population density, An area with large numbers of people from equality groups, An area with high proportions of people from equality groups, An area with a large number of destinations used by members of

**Key areas identified for consideration include:**

Your response rate for this step was:  
**100%** While you have answered more than 50% of questions on this sheet your score for this section may require further scrutiny

① Insert any additional coments regarding this part of the assessment here:

Summary of: **Step 2: Information about the scheme**

**Step 2 score** 95%

Your score at step 2 is influenced by the following areas of positive response:  
Primary beneficiaries , Trunk A-Roads, Non-motorised user (NMFU) impact

Your score at step 2 is influenced by the following areas of negative response:

Your response rate for this step was:  
**71%** While you have answered more than 50% of questions on this sheet your score for this section may require further scrutiny

① Insert any additional coments regarding this part of the assessment here:

Summary of: **Step 3: Scheme design elements for consideration**

**Step 3 score** 75%

Your score at step 3 is influenced by the following areas of positive response:  
Footways, Walking distances

Your score at step 3 is influenced by the following areas of negative response:  
Taxis, Covers and gratings

Your response rate for this step was:  
**100%** While you have answered more than 50% of questions on this sheet your score for this section may require further scrutiny

① Insert any additional coments regarding this part of the assessment here:

Summary of: **Step 4: Capturing additional information**

**Step 4 score** 0%

Your score at step 4 is influenced by the following areas of positive response:

Your score at step 4 is influenced by the following areas of negative response:

Your response rate for this step was:  
**67%** While you have answered more than 50% of questions on this sheet your score for this section may require further scrutiny

① Insert any additional coments regarding this part of the assessment here:

Summary of: **Step 5: Understanding construction effects**

**Step 5 score** 77%

Your score at step 4 is influenced by the following areas of positive response:

Your score at step 4 is influenced by the following areas of negative response:

Your response rate for this step was:  
**100%** While you have answered more than 50% of questions on this sheet your score for this section may require further scrutiny

① Insert any additional coments regarding this part of the assessment here:

From the information you have provided: ①



OVERALL EDIT SCORE:

71%

Equality, diversity and inclusion issues are likely to be a factor in the effective delivery of your scheme. An Equality Impact Assessment should be considered - consult your SRO or Diversity Representative for more information on this.  
Further consideration of development, design and construction measures will be required at the next project stage - guidance on this can be found within the next tab. Consult your SRO and Diversity Representative for more information.  
EDIT is now complete for this stage.



**REMEMBER! You know your scheme better than EDIT does.**  
EDIT provides a mechanism to help you make an informed and evidence-based decision about progressing your scheme.  
If in doubt, consult the signposting for next steps on the next sheet.



[Click here to navigate to the 'next steps' tab.](#)

Revision number:

1

Project stage:

3

Date:

21/01/2020

Signed off by Senior Responsible Owner:

Name:

Job title:

Signature:

Date:

Signed off by Diversity Representative (where applicable):

Name:

Date:

Signature:

**EDIT - Equality, Diversity and Inclusion Tool**

**What next? Signposting for potential next steps**

**Undertaking further assessment: the Equality Impact Assessment (EqIA) process**

If your scheme scored over 60% you should consider undertaking further explicit equality analysis on your scheme. If your scheme scored over 80% it is highly likely that some form of additional analysis will be required.

Highways England currently uses **Equality Impact Assessment (EqIA)** to assess those schemes considered likely to have a disproportionate impact on different sections of society. EqIA, when used in conjunction with EDIT, is a good way of evidencing your decision-making processes to support compliance with the **Equality Act 2010** and **Public Sector Equality Duty**.

Contact the Senior Responsible Owner for your scheme and your divisional diversity representative for more information on **Highways England's EqIA screening pro-forma** - a mandatory part of the EqIA process and a useful tool for turning what you have learned about your scheme from the EDIT process into an action plan to help you decide how to proceed with your project.

Guidance is available from Highways England and from national bodies responsible for this policy area.

Click on the headline links in each section to access the guidance online.



**Highways England (2016): 'Public Sector Equality Duty Objectives (2016-2020) and Annual Progress Report'**

Includes information on the objectives that Highways England has set itself as an organisation in fulfilment of its duties under the Equality Act 2010.

**Highways Agency (2011): 'Guide to Equality Impact Assessments'**

**PLEASE NOTE THAT THIS GUIDANCE IS UNDER REVIEW - THE DRAFT EMERGING HIGHWAYS ENGLAND GUIDANCE ON EqIA IS AVAILABLE ON SHARE / THE SUPPLIER PORTAL**

Includes guidance on :

- Highways England process for EqIA
- Your legal duties
- What an EqIA is and who should undertake it
- Key EqIA stages within Highways England
- Screening and full EqIA processes



**Equality and Human Rights Commission (2014): 'Meeting the Equality Duty in Policy and Decision-Making'**

Includes guidance on :

- What is equality analysis
- What you need to demonstrate to comply with the PSED
- Gathering evidence and information
- Publishing your findings
- Consultation and engagement



**Government Equality Office (2011): 'Public Sector Equality Duty: What Do I Need to Know?'**

Includes guidance on :

- Your duties under the PSED
- What you need to demonstrate to comply with the PSED
- How to evidence your decisions
- Common misconceptions about the Equality Act and PSED

**Consultation and engagement guidance**

As part of developing, designing and delivering your scheme, you may need to undertake consultation or engagement with statutory consultees, key stakeholders and members of the public. Equality legislation places significant priority on consultation as a means of demonstrating compliance with the PSED and even if a decision is taken not to undertake an Equality Impact Assessment, demonstrating consideration for equality issues within project development and design processes is strongly supported by robust engagement with stakeholders, representatives of people with protected characteristics, and members of these groups.



**Equality and Human Rights Commission (2014): 'Engagement and the equality duty: A guide for public authorities'**

Includes guidance on:

- Timescales
- Who to involve
- Engagement methodologies
- Publication of engagement materials

**Amending your scheme: design guidance**

One key conclusion you may have drawn from undertaking the EDIT process (and from any further assessment activity you undertake) is that certain aspects of your design may need to be revisited to further explore opportunities to maximise EDI benefits.

There is a range of guidance available, and while some of it is now more than ten years' old, it remains current. Much of it has been issued by the Department for Transport or Highways England and constitutes the 'design standard' on many of the issues considered throughout EDIT.

Click on the headline links in each section to access the guidance online.



**Highways Agency: 'DMRB, Volume 5: Assessment and preparation of road schemes'**

Contains guidance on:

- Crossings
- Junctions
- General considerations (such as surfaces, signing and markings, lighting, drainage and manholes, street furniture, personal safety and security, maintenance and monitoring and other issues (bus stops, escape routes for disabled motorists, and service and picnic areas).



**Department for Transport (2005): 'Inclusive Mobility: a Guide to Best Practice on Access to Pedestrian and Transport Infrastructure'**

Section 2 on preparation and implementation, includes part 4, covering provision for non-motorised users and contains guidance on:

- Pavement widths
- Gradients
- Seating
- Barriers on footways
- Street furniture
- Street works
- Surfaces
- Crossings
- Bay design
- Bus stops
- Taxi ranks



#### Department for Transport: 'Manual for Streets'

Guidance on different types of crossings linked to user groups, cyclists, public transport, bus stops



#### Department for Transport: 'Shared Space'

Guidance on shared space, which may be of particular relevance to people with disabilities.



#### SaMERU - Safer Mobility for Elderly Road Users (2013): 'Guidance'

Specific guidance for making the environment accessible for elderly road users.



#### Inclusive Design for Getting Outdoors (I'DGO)

Specific guidance for improving the environment for older people:

- Seating guidance
- Bus stops
- Tactile paving
- Pedestrian crossings
- Widths of footways and footpaths
- Adjacent and shared use (cyclists and pedestrians) of footways and footpaths
- Materials of footways and footpaths
- Changes in level of footways and footpaths
- Kerbs including tactile dropped kerbs of footways and footpaths
- Signage



#### Sustrans (2014): 'Design Manual: Handbook for cycle-friendly design'

Technical guidance on key issues around on and off highway cycle infrastructure, covering:

- Understanding user needs
- Network planning
- Streets and roads
- Traffic free routes
- Rural areas
- Crossings
- Interface with carriageway
- Bridges and other structures
- Destination signage
- Cycle parking



#### Department for Transport (2012): 'Shared Use Routes for Pedestrians and Cyclists'

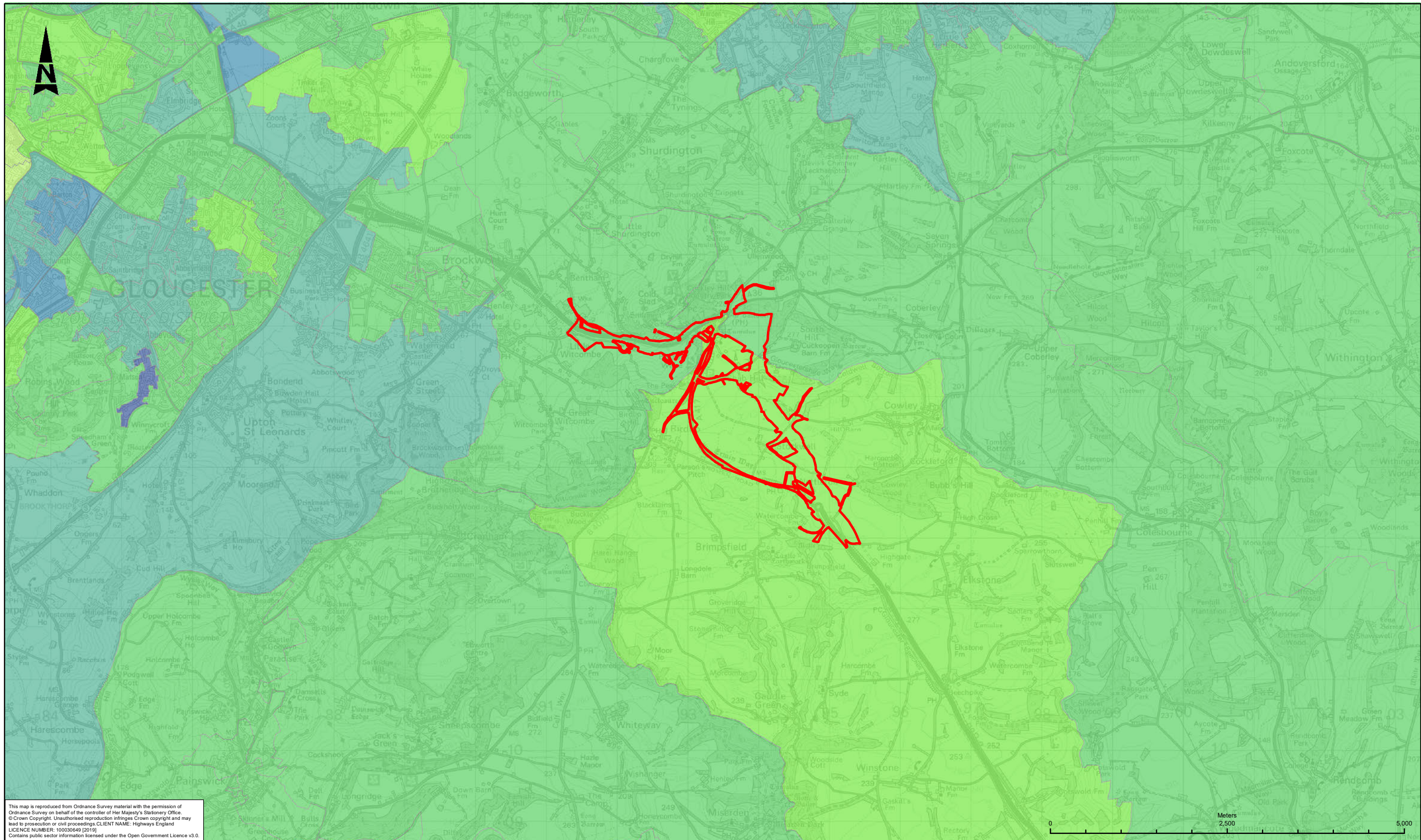
Guidance on

- Site assessment
- General design considerations
- Detailed design issues

## Appendix C Figures

- C.1 Figure 1 Population under 16 years old**
- C.2 Figure 2 Population between 16 and 24 years old**
- C.3 Figure 3 Population over 65 years old**
- C.4 Figure 4 Distribution of Disability Living Allowance (DLA) claimants**





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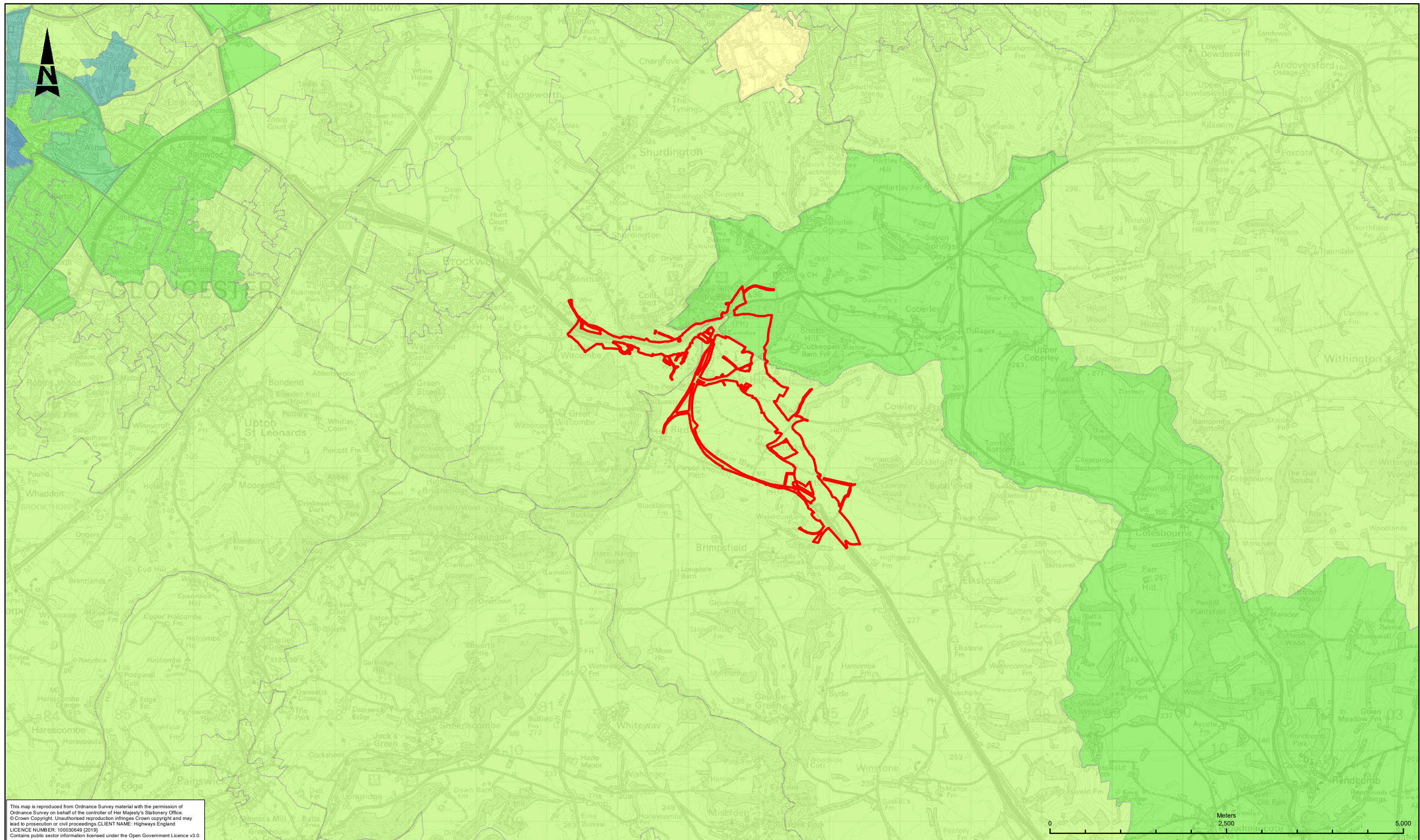
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CONSTRUCTION	
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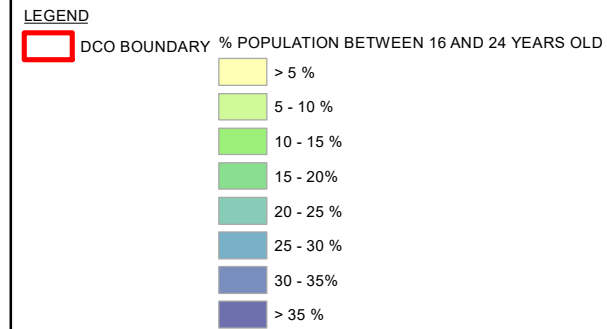
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Original Size	A3	Date	19/05/21	Date	19/05/21
Approved	JP	Date	19/05/21	Authorised	SW
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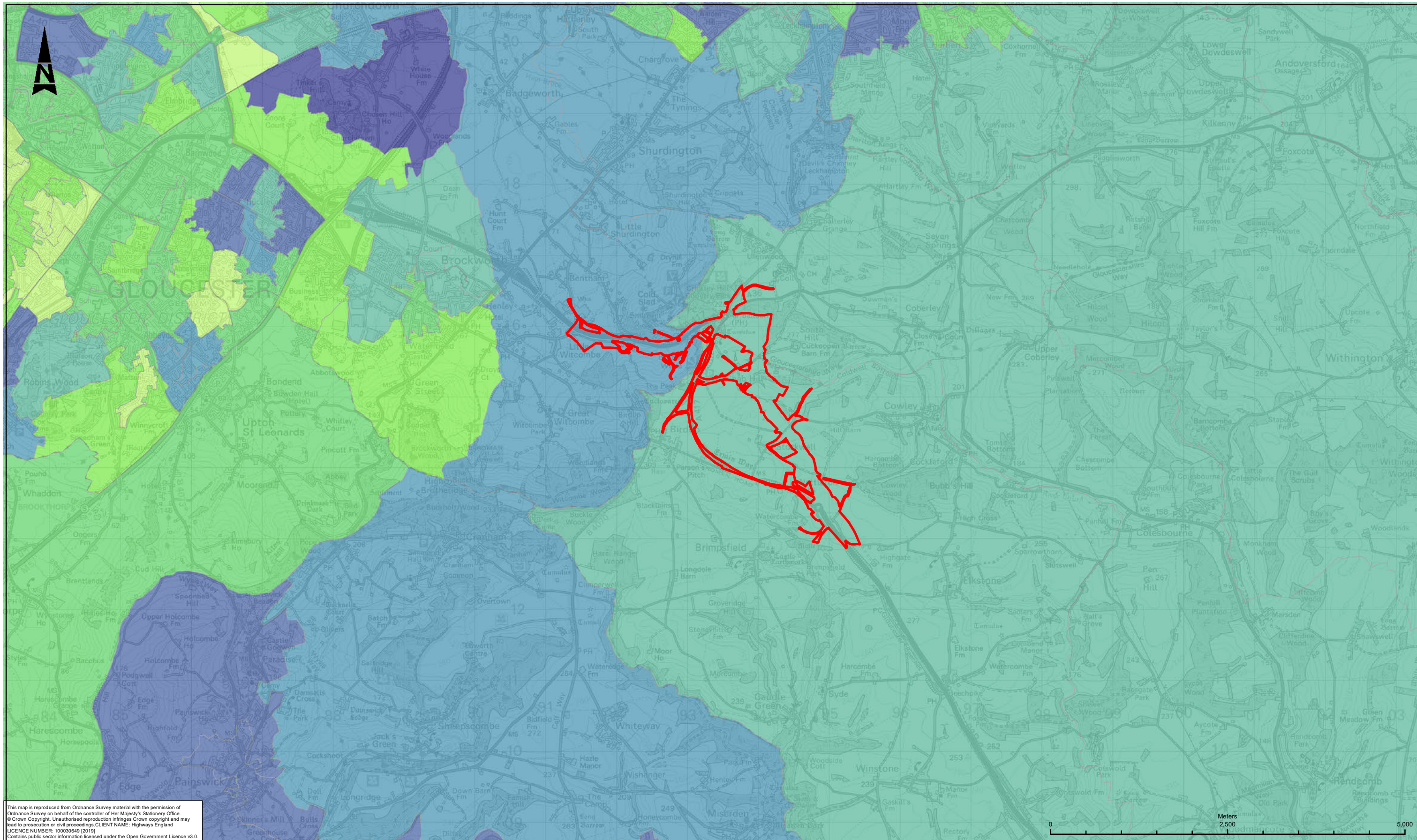
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A3	STAGE COMPLETED				A417 MISSING LINK				
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<b>highways england</b>								FIGURE 2 POPULATION BETWEEN 16 AND 24 YEARS OLD	
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**SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION**

IN ADDITION TO THE HAZARDS RISKS NORMALLY ASSOCIATED WITH THE TYPES OF WORK DETAILED ON THIS DRAWING, NOTE THE FOLLOWING SIGNIFICANT RESIDUAL RISKS (REFERENCE SHALL ALSO BE MADE IN THE DESIGN HAZARD LOG)

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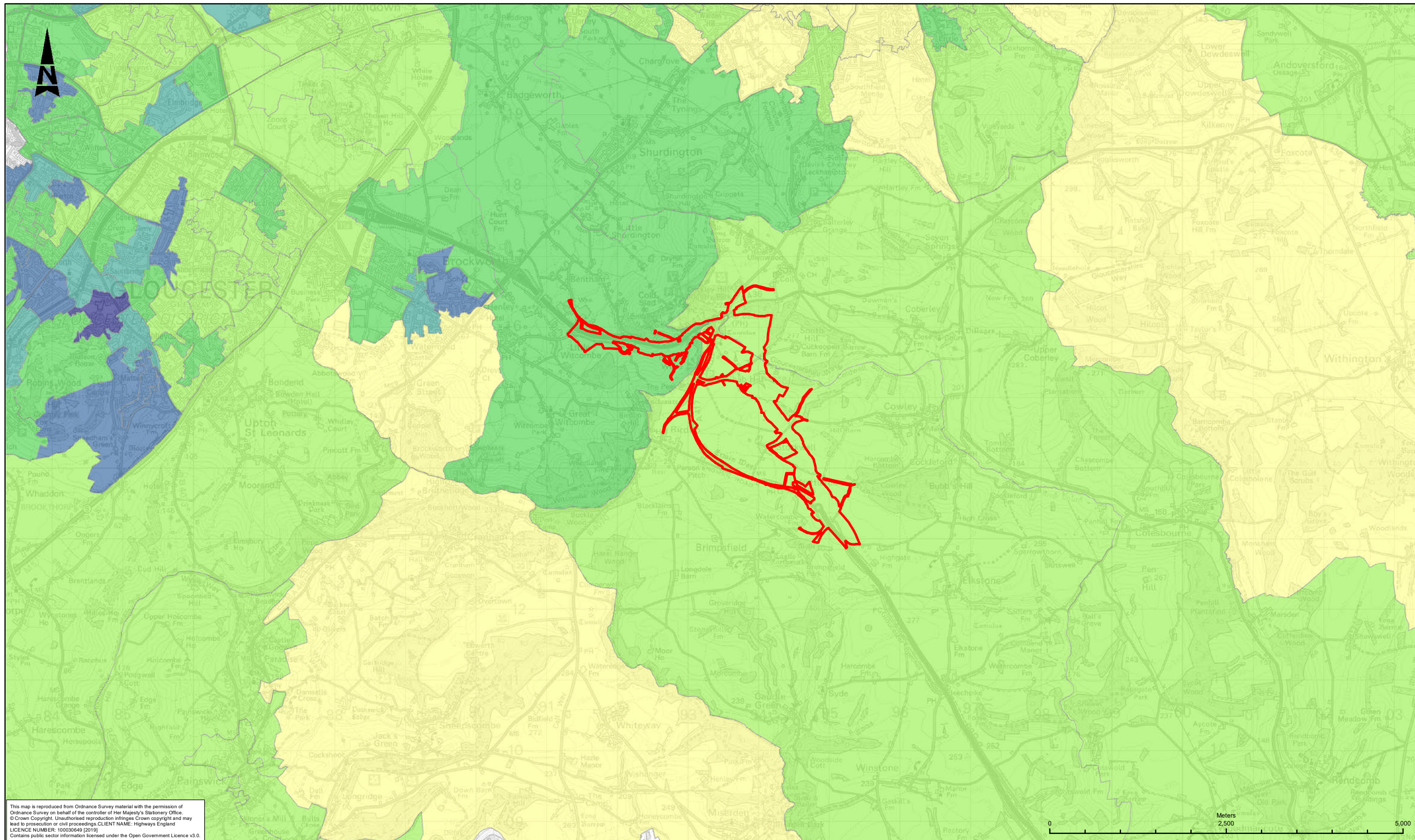
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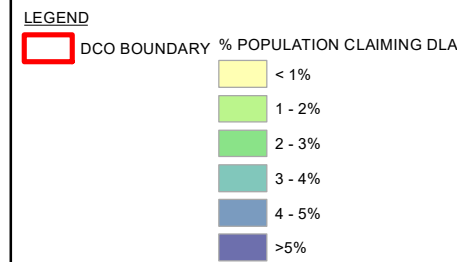
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**SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION**

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Rev.	Date	Description	By	Chk'd	App'd	Aud'd
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Client: **ARUP**

highways england

Subsidiary: A3

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# Appendix D Briefing paper from National Star College

**National Star**Realising the aspirations  
of people with disabilities

## Understanding National Star

### A Briefing Document for National Highways and the A417 'Missing Link' Project Team

#### D.1.1 Introduction

- D.1.1.1 This document has been produced at the suggestion of National Star, in order to further assist and encourage National Highways and the proposed A417 'Missing Link' Development Project Team's better understanding and insight into the background and data that underpins the concerns that have been raised by National Star. It should be read in full conjunction with the submissions previously made by National Star to the Public Consultation and Planning Inspectorate process and in the context of the meetings, discussions and correspondence that have taken place over the last two years.
- D.1.1.2 Notwithstanding the challenges of the Covid-19 pandemic, wherever possible, National Star will continue to welcome organised site visits for those involved in the project, to understand the complexities of our operation and the areas of potential impact from the proposed development that will require well considered and effective mitigation.

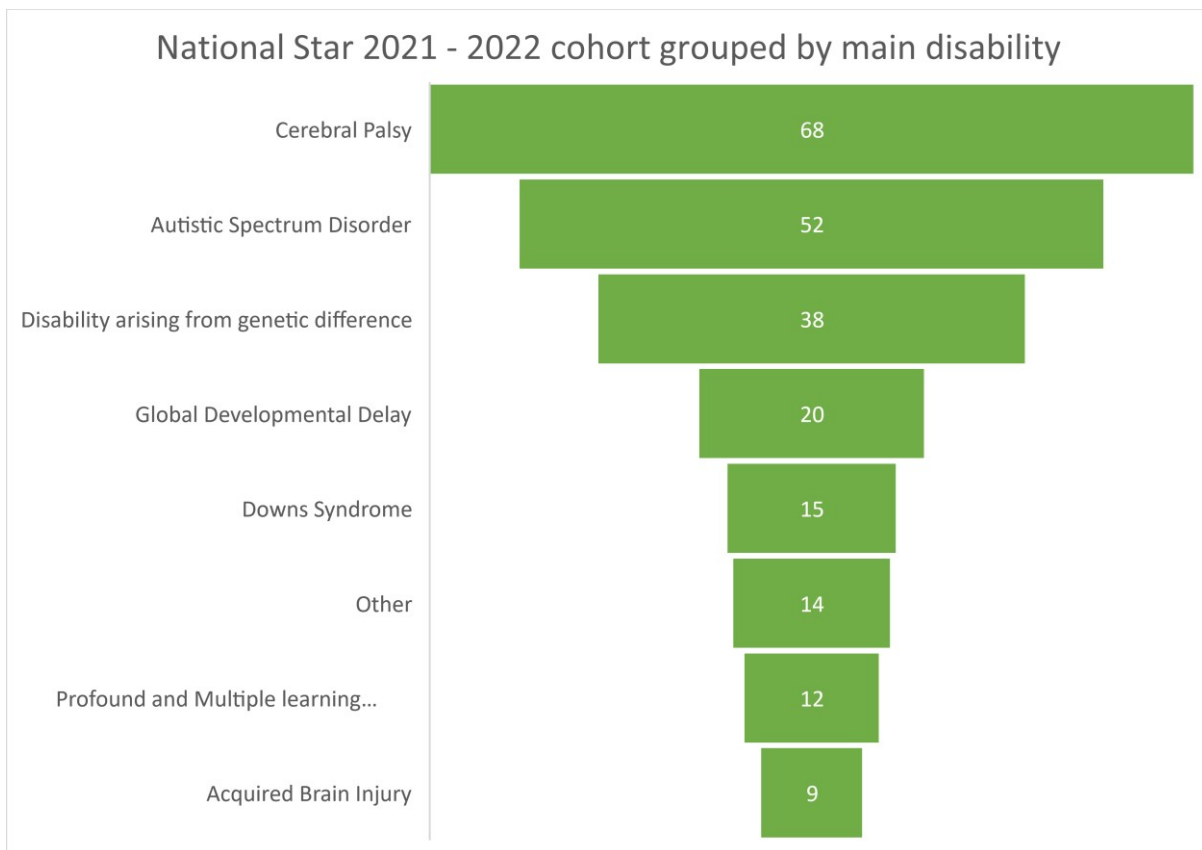
#### D.1.2 Background

- D.1.2.1 National Star provides high quality programmes and services for a wide range of young people and adults with disabilities, learning difficulties and associated medical and behavioural conditions. A significant part of the charity's provision is through the National Star College's educational, care and therapy programmes, which are offered on a residential and day basis. As a charitable independent specialist provider, National Star provides services and programmes of support for learners with the most complex needs. The Ullenwood site is the main hub for the organisation's services and activities and the administrative headquarters for the charity.
- D.1.2.2 National Star's Ullenwood site is registered with the Care Quality Commission as a nursing home and as a provider of education disability services (accommodation for persons who require nursing or personal care, Learning disabilities, Personal care, Physical disabilities, Sensory impairments, Treatment of disease, disorder, or injury, Caring for children (0 - 18yrs), Caring for adults under 65 yrs). The charity's National Star College is also regulated by Ofsted, as an Independent Specialist College for learners with disabilities and provides placements under Section 42 of the Children and Families Act 2014 for young people and adults with disabilities on a local, regional and national basis.
- D.1.2.3 The organisation focuses on three key charitable activities: education and personal development; accommodation with care and nursing services, and support services. National Star's wider activities include other educational programmes (such as adult education and travel training for people with

disabilities), therapy services, long term residential care, 52 week respite care and short breaks.

- D.1.2.4 National Star also has several ‘satellite’ operations (including education and care centres in Hereford and South Wales, residential care in Cheltenham, Gloucester, Malvern and Hereford and numerous programmes with partner organisations across the country), which depend on accessing the specialisms of the main site at Ullenwood.
- D.1.2.5 National Star College’s residential students are based at the Ullenwood campus and also at ‘off site’ residential accommodation in Cheltenham and Gloucester. The cohort of learners who live on, or attend provision based at, the Ullenwood campus have a wide range of severe and complex disabilities and health needs as summarised in the following section.
- D.1.2.6 The Ullenwood site provides residential accommodation for young people with disabilities (including 52 week provision and respite care), day student facilities, specialist therapies and medical facilities, educational, recreational and personal development spaces, as well as extensive grounds. Whilst provision is based inside the specialist accommodation, external spaces are also extensively used to support learning (e.g. developing mobility skills, horticulture, external curriculum) but also, critically, to support behavioural needs and using external play and therapy equipment or access to the outdoors (e.g. nature trail path) to aid de-escalation of anxieties or behaviours.

### D.1.3 Disabilities and Conditions



D.1.3.1 To illustrate the complexities and characteristics of the young people with disabilities who access and live at the National Star campus at Ullenwood, more details relating to the nature of their disabilities and associated typical individual conditions is provided below:

Category of disability	Typical individual conditions
Cerebral Palsy	Cerebral Palsy, Quadriplegic, Visual impairment. Severe learning delay. Cerebral Palsy, Profound Multiple Learning Disabilities, microcephaly, low muscle tone, squint, Global Development Delay, nocturnal epilepsy. Cerebral Palsy with secondary dystonia, Autistic Spectrum Condition, Chronic lung disease.
Autistic Spectrum Disorder (ASD)	ASD with anxieties, Learning Delays, Tics and Obsessive behaviour. ASD, Functional Neurological Disorder, Tourette's, severe non epileptic seizures, severe anxiety, OCD, sensory issues. ASD, Moderate Learning Disability, severe sensory obsessions - sound primarily.
Disability arising from Genetic Difference	Russell Silver syndrome, Global Development Delay, attachment disorder, anxiety. Auditory Impairment. Di-George Syndrome (22q11 chromosome deletion), VSD, Pulmonary Atresia, Maccas, Tracheostomy, Global Development Delay, Hypermobility, Scoliosis, Profound Multiple Learning Disabilities, complex health needs. Chromosome 15 Disorder, Severe Global Development Delay, Epilepsy, Fine/gross motor impairment.
Global Developmental Delay (GDD)	Global Learning Delay, ASD with demand avoidance, anxiety, Non-Epileptic Attack Disorder, Severe Learning Disability. GDD, ASD, Moderate Learning Disability, Rapid mood cycling and psychosis. History of severe psychosis. Global development delay, growth plate deformities.
Downs Syndrome	Down Syndrome, learning difficulty, depression, anxiety, auditory hallucinations, heart condition. Down Syndrome, SLD, Hirschsprungs; challenging and aggressive behaviour at times without warning. Downs & ASD with Severe Learning Disability, Reflux Disease, sensory integration dysfunction.
Profound and Multiple learning Disabilities (PMLD) and Severe Learning Disabilities	PMLD, ASD, GDD, dyspraxia, sensory processing difficulties, high anxiety, Severe Learning Disability. Profound learning disability; autism; epilepsy; allergies; eczema. Severe and profound learning disability, epilepsy, atypical autism.
Acquired Brain Injury (ABI)	• ABI (resultant brain damage from accident), visual impairment, Severe Learning Disability.

	<ul style="list-style-type: none"> <li>Severe ABI (resultant from cardiac arrest), hypertrophic cardiomyopathy, cortical visual impairment, Profound Multiple Learning Disabilities.</li> <li>ABI (resultant from Meningitis), challenging behaviours, severe communication impairment, severe visual impairment, asthma.</li> </ul>
Other	<ul style="list-style-type: none"> <li>Anxiety, Trauma, Challenging behaviour, Moderate LD.</li> <li>Severe Dyspraxia, Ulcerative Colitis, Non-alcoholic Fatty Liver Disease, Severe Learning Disability.</li> <li>Dyspraxia, ADHD, Pathological Demand Avoidance, auto immune disease.</li> </ul>

D.1.3.2 As can be seen from this summary of disabilities, the students, residents and service users at National Star have protected characteristics and, as a large community in close proximity to the proposed development, they are at risk of a disproportionate and differential impact from the scheme.

D.1.3.3 Some of the highlighted conditions emphasise the susceptibility of the individuals to impact factors such as disturbance and air quality, due to the nature of their disabilities, behaviours and medical health conditions. The summary also shows the range and complexity of disabilities that have to be supported at the Ullenwood site by care, therapy, nursing and education staff and provides an indication of how difficult and complicated their lives already are in accessing the specialist programmes at National Star.

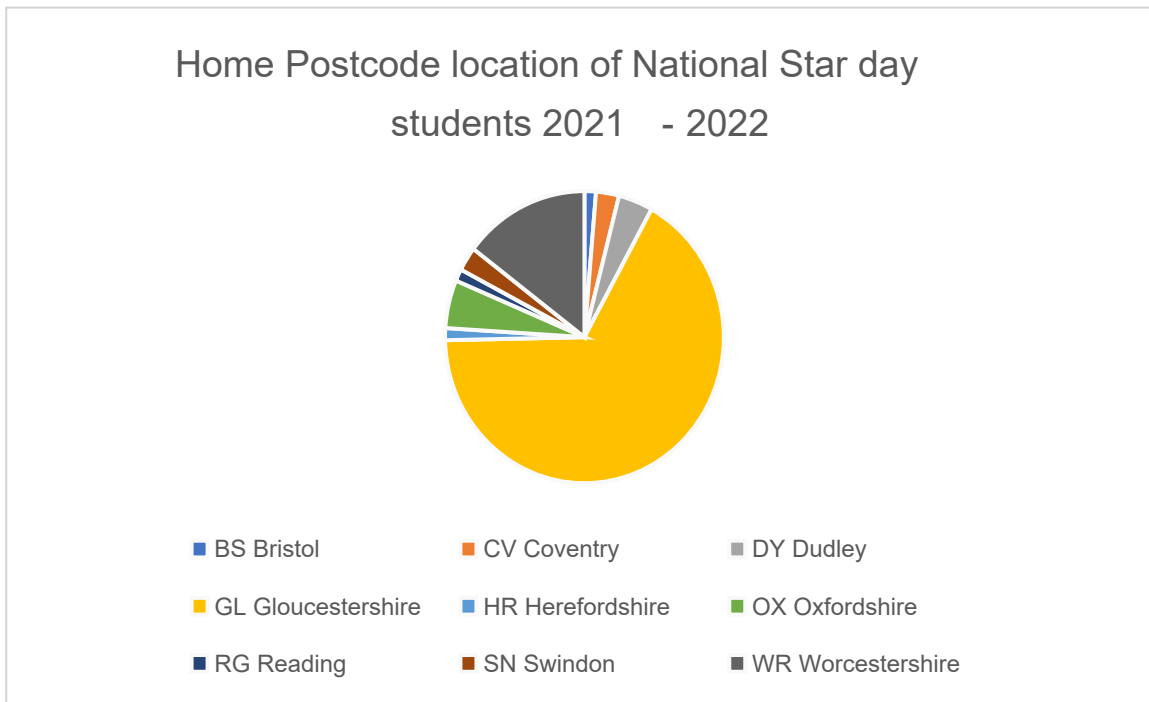
#### **D.1.4 Access to the Ullenwood Site Day Students**

D.1.4.1 National Star's Ullenwood campus currently supports 76 day students. The majority of these young people with disabilities will have single person transport (either by families, Taxis or specialist contracted transport providers), due to the complex nature of their individual disabilities, and the requirement to provide transport from each individual's home location to National Star at Ullenwood.

D.1.4.2 Day students come from a wide radius within Gloucestershire and also from surrounding counties. Journey times for some individuals are already stretched to their limits (partly as a result of local authorities seeking to fund day placements in preference to more expensive residential placements).

D.1.4.3 The nature of the travel distances and extent of home locations also reflects the lack of any other suitable alternative provision local to the individual and their dependency on accessing their placement at National Star. Continued and unimpeded access without detrimental impact on journey times will be critical to maintaining the sustainability and viability of their placement at National Star.

**Day Student Home Locations – Daily Journeys to National Star for Timetabled Provision:**



**Postcode Analysis of Day Student Home Locations Accessing Ullenwood:**



D.1.4.4 This shows the extent of different journeys already undertaken by day students, who are dependent on not experiencing delays to their journey in order to access their fully timetabled schedule of education, care and therapies at National Star.



## D.1.5 Residential Students

- D.1.5.1 National Star currently has 105 residential students from all across the UK. As a National Centre of Excellence, the geographical spread of home locations reflects the high dependency of the individuals on sustaining their placement at National Star and the lack of other alternative provision to appropriately meet their needs.
- D.1.5.2 The majority of students receive regular visits from members of their family travelling from their home areas. National Star is also visited by a wide range of professionals from students home local authorities, which also increases during a student's final year as their transition is prepared for.

### Residential Students Home Locations:



## D.1.6 Transportation Between Sites & Community Access

- D.1.6.1 Whilst the majority of National Star's residential students are based at the Ullenwood site, a proportion (c.30%) have their residential accommodation based in Cheltenham and Gloucester at Bradbury Gardens, Pittville and Elizabeth House, Gloucester. The 'off-site' students access their fully timetabled day of education, therapies and care at the Ullenwood campus and are dependent on regular, timely, minibus access to Ullenwood.
- D.1.6.2 Two continuous circular staff minibus routes also operate between Ullenwood to Gloucester and to Cheltenham to enable staff to access Ullenwood who do not have their own transport (there is no public transport provision to the site).
- D.1.6.3 National Star's provision and the life skills development within student programmes makes extensive use of the local and regional community. Individual and group activities take place in Cheltenham, Gloucester,

Tewkesbury, Bristol and Worcester throughout each week, and leisure activities or trips frequently occur at weekends. Community access is a vital part of each young person’s programme, any disruption would have a significant impact on the outcomes the individual can achieve.

**National Star Transport Fleet - Journeys To/From Ullenwood and Cheltenham/Gloucester**

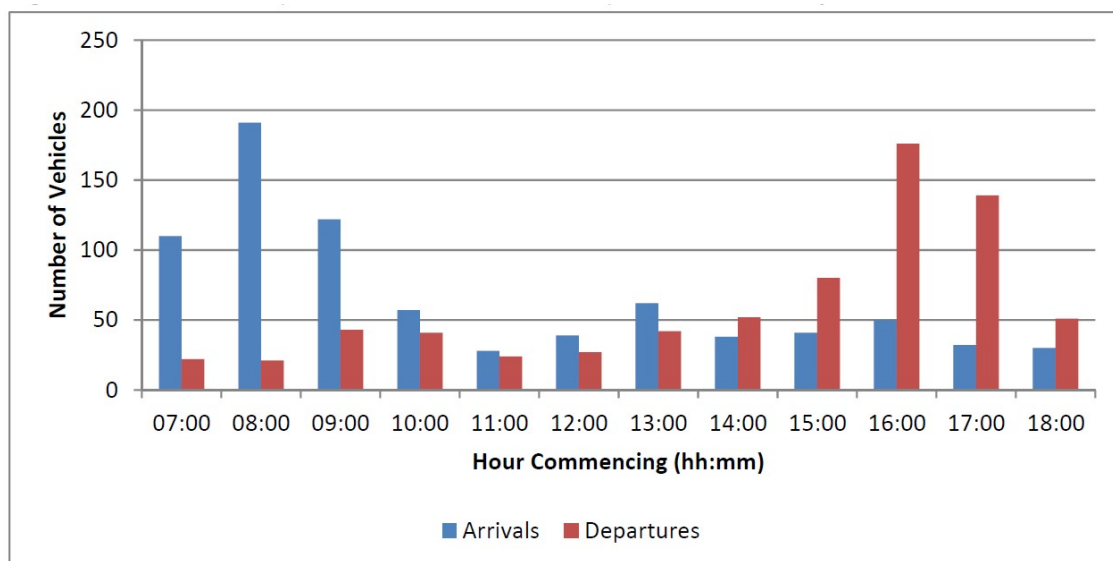
Destination	Typical Daily	Typical Weekly
Gloucester	19	133
Cheltenham	23	161

**D.1.7 Other Vehicular Access to Ullenwood**

D.1.7.1 Given the rural location of National Star’s Ullenwood site, staff are dependent on individual personal transport (mainly cars, some motorbikes, a few cyclists), car-share journeys and the staff minibus service outlined earlier.

D.1.7.2 There are an average of 1518 vehicle movements per day (7am-7pm) accessing the Ullenwood site with a relatively even spread between arrivals (800) and departures (718) and a peak between 7am-9am and 3pm-5pm. Due to the 24 hour/7 day nature of the provision, care and nursing staff work shift patterns and there is also access to the site by night staff (e.g. typically 10pm/11pm arrivals) that is not included in this analysis. However, the night -time access by night staff and on call staff is an important factor for the 24 hour continuity of access consideration, as is the ease of unencumbered access by emergency services. The site is also dependent on daily attendance from supplier deliveries, fuel supplies (woodchip district heating system), pharmacy and medical attendance, etc.

**Pattern of Typical Day Arrivals and Departures at Ullenwood Site**

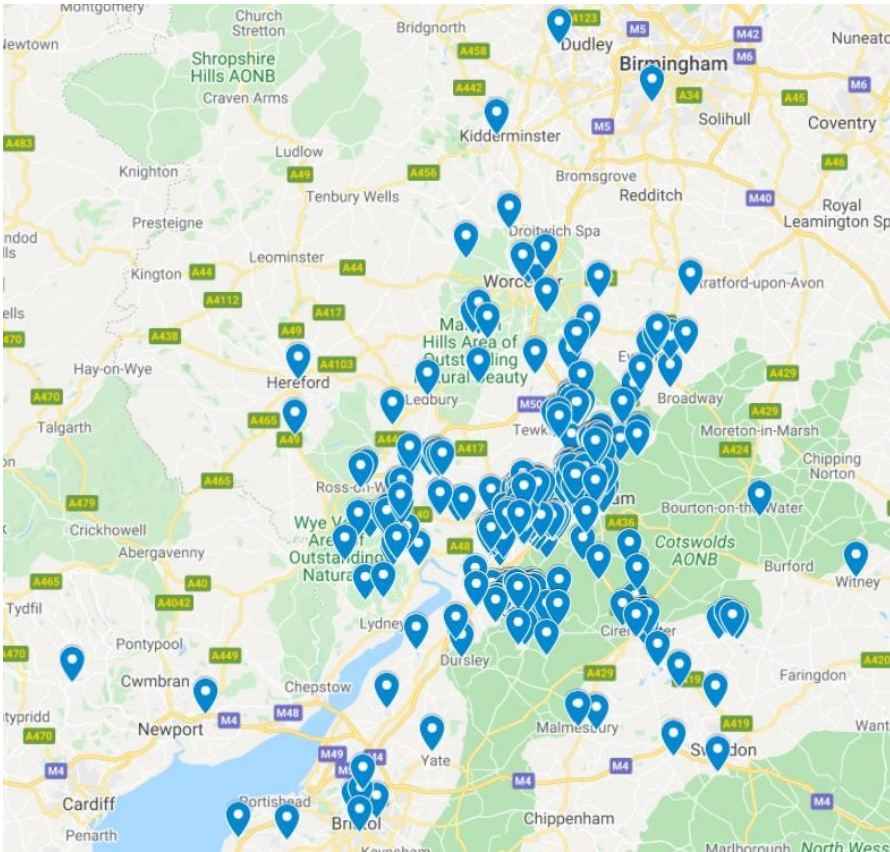


D.1.7.3 Of those daily vehicle movements, the majority will be critical staff attendance (i.e. those care, therapy, nursing, education staff and other support functions). Typically, the staff cohort who access the Ullenwood site to deliver services on a daily basis attend from a radius reaching from Birmingham to Bristol and Welsh

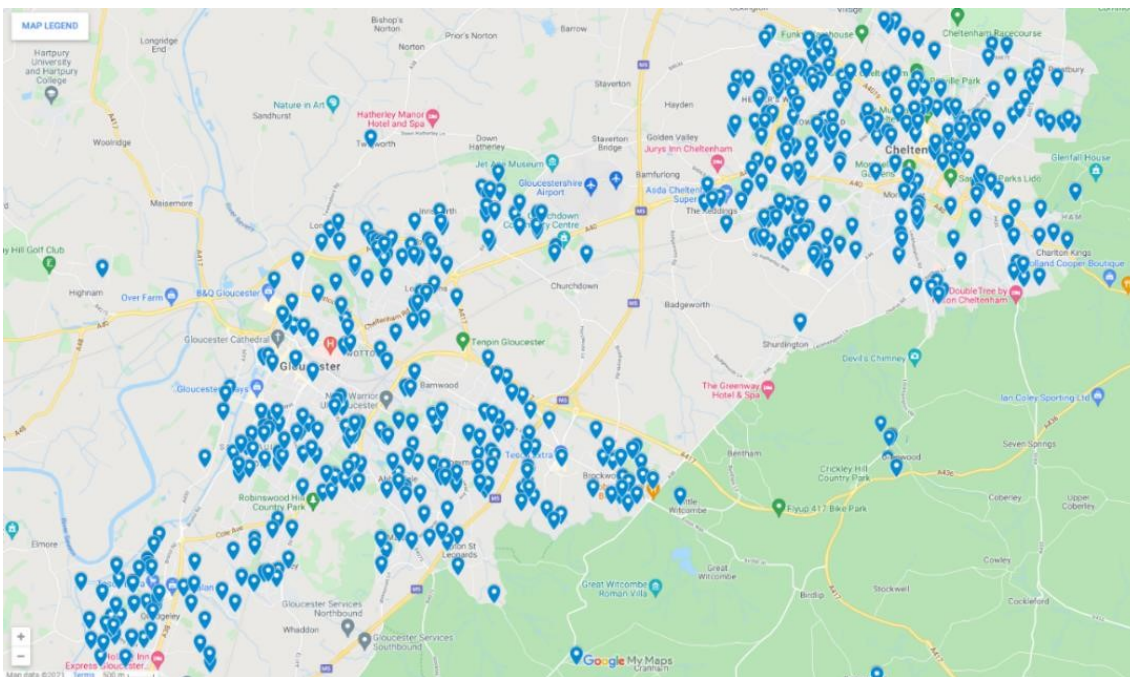


borders to Oxford, with the largest numbers being from surrounding towns (Cheltenham, Gloucester, Cirencester, Stroud, Tewkesbury, etc.).

### Home Locations of Staff Accessing Ullenwood on a Daily Basis



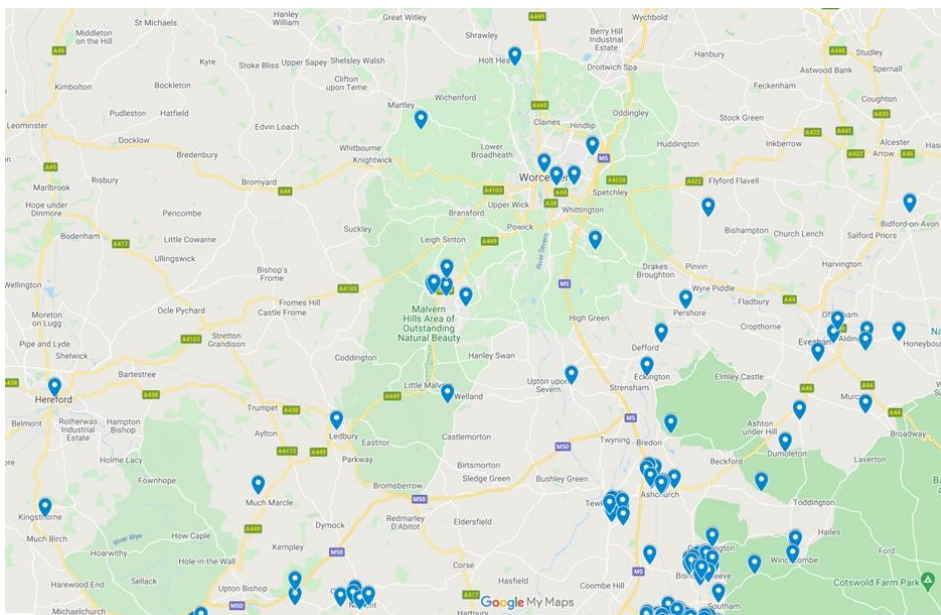
### Sub-Analysis of Cheltenham & Gloucester Staff Home Locations



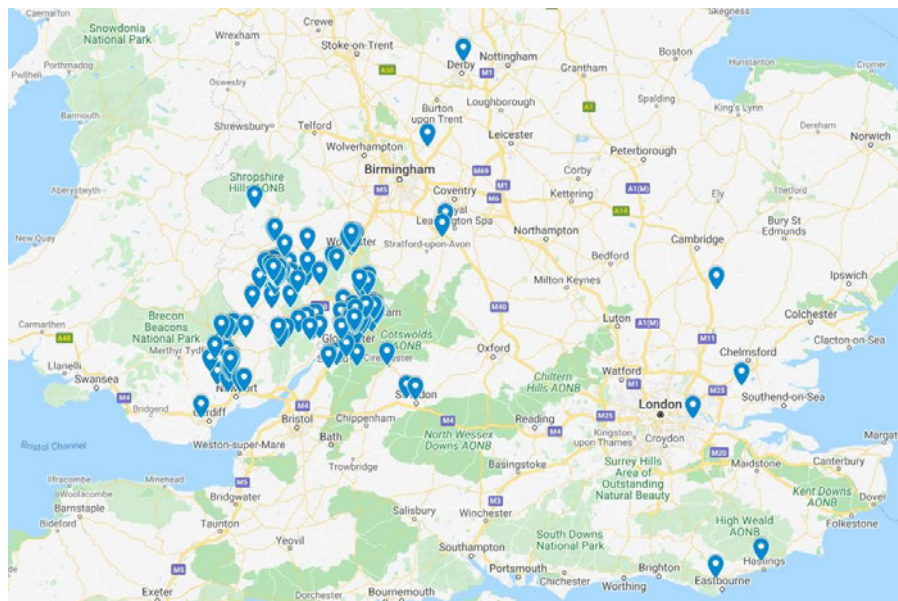
### Sub-Analysis of Cirencester / Stroud Staff Home Locations



### Sub-Analysis of North Glos/Worcestershire Staff Home Locations



### Other National Star Staff Accessing Ullenwood Site Occasionally/Ad Hoc





## **D.1.8 Conclusion**

- D.1.8.1 The information provided in this briefing paper serves to highlight the critical and vulnerable nature of the provision at National Star's Ullenwood campus. Those who access National Star's accommodation and services have protected characteristics and the location of the Ullenwood site is particularly susceptible to impact from the proposed development.
- D.1.8.2 For those people with disabilities and their families, who rely on the continuity of provision at National Star, it is vital that their provision continues to be sustainable and without detriment to their ease of access, quality of experience, opportunity and environment.
- D.1.8.3 For National Star, any detriment to quality, continuity or sustainability of provision will not only translate to a catastrophic loss of provision for the individual, but also the associated financial loss of income to the charity (individual placements vary from c.£50k-£400k p.a.), which would then translate into a necessary reduction of staffing and threaten the charity's organisational viability.
- D.1.8.4 The proximity of the proposed development to the site leads to the concerns previously outlined, particularly relating to noise, air and environmental impact (especially due to the nature of the disabilities, behaviours and medical conditions of students and residents).
- D.1.8.5 The reliance on unimpeded access to the site for those accessing provision and for the staff who provide it is evident from the data provided in this paper.
- D.1.8.6 It is incumbent on National Highways and its project team to ensure that it has given full in depth consideration and due regard for those people with disabilities who are dependent on the continuity of provision at National Star and to fully assess, prevent and mitigate all areas of concern and impact.

# Appendix E Record of Engagement with National Star College

**Table E1: Record of engagement with National Star College**

Date	Form of correspondence	Key Topics Discussed and Key Outcomes
27/09/2019	Land Interest Consultation Invitation - Letter	Meeting arranged for the 10 October 2019.
10/10/2019	Meeting	At the meeting with NSC, the following issues were discussed: <ul style="list-style-type: none"> <li>• Blight and compensation</li> <li>• Construction works mitigation.</li> <li>• Environmental impact</li> <li>• Land access</li> <li>• Noise impacts; and</li> <li>• Public Right of Way routes.</li> </ul>
09/11/2019	Statutory Consultation Response	NSC submitted a Section 42 response letter for the statutory consultation for the scheme.
10/01/2020	Meeting	Site meeting to discuss consultation. The meeting began but it was agreed that further work was required to help inform discussions. Meeting date rearranged for the 30 <sup>th</sup> January 2020.
13/01/2020	Land Interest Consultation Invitation - Letter	Meeting arranged for the 30 January 2020.
30/01/2020	Meeting	The main concerns raised by the NSC at the meeting were: <ul style="list-style-type: none"> <li>• Construction impacts and mitigation required.</li> <li>• Land impact on NSC's land</li> <li>• The schemes impact on the College's existing drainage infrastructure.</li> </ul> <p>It was agreed that an additional meeting was to be arranged between Arup and National Highways specialists to cover Air Quality, Noise, Construction, Traffic Management and Drainage.</p>
23/03/2020	Meeting	Meeting cancelled due to Covid-19.
09/06/2020	Meeting	A project team meeting was arranged with NSC but was cancelled due to key scheme design changes occurring resulting in landowner meetings being rescheduled.
28/07/2020	Email Correspondence	Meeting invite issued to NSC. Meeting date requested by NSC was the 10th September 2020.
08/09/2020	Email correspondence	Updated Land Interest Plans and meeting agenda shared.

10/09/2020	Meeting (Virtual)	<p>The purpose of the meeting was to review the recent design changes for the scheme.</p> <p>It was explained that the green bridge has been removed as part of the scheme design. Two separate crossings; at the Air Balloon Cottages and connecting to the Gloucestershire Way, will be constructed instead.</p> <p>Issues relating to noise, drainage, traffic, air quality, landscape and access were discussed.</p> <p>An action from the meeting was for a call to be arranged between the District Valuer Services, Arup, National Highways and the College to discuss accommodation works, land acquisition and compensation.</p> <p>The College requested that communication between the project team and National Star is improved.</p>
13/10/2020	Meeting (Virtual)	<p>Financial support available for land agent fees was explained to NSC. It was agreed that National Highways will provide financial support for two land agents if sufficient justification that two land agents are required. NSC agreed to provide justification in writing.</p>
13/10/2020	Statutory Consultation Notification	<p>Correspondence issued to NSC notifying them of the beginning of the statutory consultation.</p>
11/11/2020	Meeting (Virtual)	<p>The purpose of this meeting was to review the recent design changes for the scheme and the issues discussed at the landowner meeting on the 10th September.</p> <p>NSC submitted a statutory consultation response outlining concerns relating to the scheme including air quality, noise, traffic management, drainage, disabled access, landscape, compensation, land take and the European Convention on Human Rights.</p> <p>Issues relating to drainage was the key focus of the meeting, but other concerns were also discussed including construction works, disabled access and landscape proposals.</p> <p>A number of actions were taken at the meeting for the project team. Follow up discussions are to be arranged when the relevant technical specialist guidance has been sought.</p>
04/12/2020	Email Correspondence	<p>Consultation Response and Drainage Note issued to NSC for comment.</p>
09/12/2020	Meeting	<p>An in-person site walkover of NSC's site took place to discuss the drainage design proposed. The alternative drainage designs at the College were discussed. It was agreed that infiltration testing will be completed to determine the viability of the 100% highway infiltration design option.</p> <p>NSC stated that the permanent easement proposed as part of the current drainage design was the main reason for their objection. The College raised concerns that the</p>

		permanent easement would impact future development opportunities on their site.
23/12/2020	Email Correspondence	Comments received from NSC about the Consultation Response and Drainage Note issued.
13/01/2021	Meeting (Virtual)	<p>Meeting to discuss the drainage design at NSC with Gloucestershire County Council (GCC). The drainage technical note issued to NSC was discussed and further detail was provided to address issues identified by the College.</p> <p>NSC stated they would object to the scheme if the permanent easement proposed was not removed. Detail was provided about the proposed 100% infiltration design option.</p> <p>Work to be undertaken to determine the viability of the 100% infiltration design.</p>
29/01/2021	Email Correspondence	Draft accommodation works plans issued to NSC for comment.
29/01/2021	Email Correspondence	<p>Comments provided by NSC about the accommodation works plans.</p> <p>NSC raised concerns that the plans do not contain any accommodation works in relation to the College's land. NSC's understanding is that the works relate to National Highways land that they are proposing to acquire on a permanent basis from the College.</p> <p>NSC requested a post and rail fence on the boundary of the permanent land take and the colleges' retained land. NSC requested that appropriate screening in the form of tree planting needs to be provided.</p>
08/02/2021	Targeted Landowner Consultation	Correspondence issued to NSC notifying them of the beginning of the targeted landowner consultation. NSC were impacted by the targeted landowner consultation as a result of the half width land designated to the College. Letter issued to NSC making the commitment to not require a permanent easement across the Colleges land in response to concerns about the drainage route. Sent 23/03/21.
10/03/2021	Meeting (Virtual)	<p>Meeting to provide an update on the drainage design works at NSC with GCC in attendance. It was explained that the preliminary testing to determine the viability of the 100% infiltration design has been positive.</p> <p>Infiltration design and results to be shared with NSC when available for issue (April/May 2021).</p> <p>Meeting to be arranged when further update on the drainage design is available.</p>
07/05/2021	Site Visit	Site visit to discuss air quality and landscape proposals and impacts as part of the scheme.

		<p>The scheme landscape specialist explained that the trees proposed as part of the landscape works will focus around the boundaries of NSC's land impacted by the scheme and the northern section of the infiltration dip in the landform discussed.</p> <p>The scheme air quality specialist explained that if the scheme mitigation is carried out in accordance with the Environmental Management Plan and construction best practice there is predicted to be no significant effect from dust at any receptors within 200m of the DCO boundary.</p> <p>The scheme air quality and landscape specialist agreed to provide further detail at the Microsoft Teams Meeting on the 19<sup>th</sup> May.</p>
19/05/2021	Meeting (Virtual)	<p>An overview of the DCO process from the point of submission for the application was provided. The DCO was confirmed to be on course to be submitted late May/early June 2021. NSC will have opportunities throughout the DCO process to engage and comment on the application. National Highways confirmed that engagement with NSC will continue post DCO submission.</p> <p>NSC stated that their financial concerns are not about valuation but other matters including but not limited to financial loss under disturbance. It was explained that NSC can submit compensation claims for loss of earnings, but appropriate evidence needs to be provided.</p> <p>Design works for the proposed 100% infiltration for the drainage infrastructure at the College show positive results. Good infiltration characteristics have been found and assessments show that pollution levels are within acceptable limits. Yet, additional treatment is required. No significant changes are proposed to the ponds which differ from the previous design.</p> <p>The planned maintenance and operation of the basins on NSC's land has not changed. This is GCC will maintain and operate basin group 5 and basin group 3a will be maintained and operated by National Highways. NSC requested a conclusive letter stating that a permanent easement will not be provided as part of the scheme and that addresses their comments provided previously to Michael Goddard.</p> <p>The scheme landscape specialist stated that the trees proposed as part of the landscape works will focus around the boundaries of NSC's land impacted by the scheme and the northern section of the infiltration dip in the landform discussed. The ponds on the northern side of the field will not be permanently full of water and will have a parkland like character. 3D imagery to be produced showing the landscape proposals in greater detail. A plan showing the temporary and permanent areas to be pegged out to be shared with NSC.</p>



		<p>Air Quality Assessments have been completed at the College which includes a consideration of dust generated from the construction site. National Highways explained that if the scheme mitigation proposed is carried out in accordance with the Environmental Management Plan and construction best practice there is predicted to be no significant effect from dust at any receptors within 200m of the DCO boundary. The DCO will include air quality commitments that National Highways will need to adhere to. NSC raised concerns about the assessments completed. Air quality monitoring (typically used on high impact air quality construction projects in areas where existing air quality levels are poor) is to be provided throughout the duration of the scheme. A commitment for this will be included within the Position Statement which will later be submitted at DCO acceptance.</p> <p>National Highways explained a meeting to discuss the Construction Traffic Management Plan (CTMP) will be arranged when the construction contractor contractually begins working on the scheme. Their appointment is imminent, so a meeting is likely to take place in the next few weeks.</p> <p>National Highways agreed to provide a written response explaining professional fee compensation for the scheme.</p> <p>NSC raised concerns about the Equality Impact Assessment (EqIA) completed for the scheme. Concerns related to the methodology adopted for the assessment and why NSC were not considered in greater detail throughout. National Highways to provide a separate response to the concerns raised.</p> <p>A summary of the Environmental Designated Fund opportunities relating to the scheme were provided. NSC stated they would be interested in reviewing these opportunities further and request a further meeting is arranged to discuss.</p>
27/05/2021	Virtual Noise Demonstration	<p>NSC are considered to be a sensitive receptor for noise during the construction of the scheme in consideration of DMRB guidance, although significant noise effects from construction or operation of the proposed scheme have not been identified in the assessment. However, if there are rooms that the College considers to be particularly critical, such as speech therapy rooms, this can be examined further and, if appropriate, measures taken to allow windows to remain closed during summer months.</p> <p>National Highways provided an overview of what will be heard at the College during construction works as part of an online, virtual noise demonstration. It was explained that the virtual noise demonstration has been organised instead of attending an in-person acoustic sound lab presentation because of Covid safety constraints at the time of the demonstration).</p>

		<p>The sound demonstration has been taken from the most southerly building of the site as it's the closest to the works. The main noise sources that NSC will experience are from the haul road route along the line of the scheme and the cutting excavation works.</p> <p>It was explained that the rock breaker would create the highest noise level in relation to the scheme but the need for the rock breaker would be occasional and may not be required for much of the cutting works. For example, in some instances, it may be used for a week and then not used for several weeks after that, depending on ground conditions encountered deep in the cutting.</p> <p>The noise levels presented at the demonstration were:</p> <ul style="list-style-type: none"> <li>• Ambient level outside of the southern building</li> <li>• Construction noise sources of cutting excavation and haul road.</li> <li>• Occasional breaking noise.</li> <li>• Move listening location inside (with windows open) to hear the same noise sources.</li> </ul> <p>NSC asked if there will be a record that the College accept the noise impact created by the scheme during construction relative to the existing traffic noise in consideration of what was presented in the noise demonstration. National Highways agreed to include a commitment in the Position Statement (see Table 2 below).</p> <p>Noise levels will be monitored throughout the construction of the scheme and, if considered necessary by the College, appropriate mitigation measures will be reviewed, as described above for affected rooms. NSC can contact National Highways at any point during the construction of the scheme if they have any issues with the noise levels created.</p> <p>National Highways to explore possibility of doing face to face noise demonstration in the future when possible in consideration of a reduction in COVID restrictions.</p>
08/06/2021	Meeting (Virtual)	Meeting between the DVS and NSC to discuss blight and compensation. NSC stated they do not feel they are able to continue blight and compensation discussions until other matters outstanding are addressed in relation to the scheme.
05/08/2021	Email Correspondence	Updated Position Statement issued to NSC for review.
01/09/2021	Meeting (Virtual)	<p>Meeting to discuss the EqIA completed for the scheme. Detail about the EqIA methodology, data sets and results were provided.</p> <p>Agreed actions were:</p> <ul style="list-style-type: none"> <li>• HE EDI Lead to attend future NSC landowner meetings where EDI and the EqIA is on the</li> </ul>

		<p>agenda. This will help to support collaboration between the landowner and EDI project teams;</p> <ul style="list-style-type: none"> <li>• NSC to be added as an identified group with protected characteristics in the next iteration of the EqIA;</li> <li>• Data on the College's students to be requested from NSC. This data will be reviewed as part of future iterations of the EqIA. Personal and sensitive data requirements will be considered if this data is used.</li> <li>• Further details about landowner discussions with NSC will be included in future iterations of the EqIA; and</li> <li>• HE EDI Lead to send the Stage 1 and Stage 2 EqIAs to NSC.</li> </ul>
21/09/2021	Email Correspondence	Minutes from the meeting on the 1 <sup>st</sup> September 2021 issued to NSC for review and comment.
06/10/2021	Meeting (Virtual)	<p>Meeting arranged to discuss relevant representation response submitted by NSC.</p> <p>Meeting notes relating to EqIA and a non-vehicular crossing at Leckhampton Hill were issued to NSC on the 5<sup>th</sup> October 2021.</p> <p>NSC requested that the meeting is rearranged for autumn 2021 to allow more time to review the notes produced. Meeting cancelled and to be rearranged.</p>
15/10/2021	Telephone Call	<p>A telephone call to discuss rearranging the meeting that was scheduled for the 6<sup>th</sup> October 2021.</p> <p>It was agreed that the agenda items proposed for the original meeting will be split up and discussed at two separate meetings.</p> <p>Comments on the EqIA minutes and note to be provided by Ian Miles.</p> <p>Verbal agreement made about arranging an in-person noise demonstration to showcase the level of impact the scheme.</p> <p>Concerns about the drainage outfall on NSC's land was discussed and it was agreed that the scheme drainage specialist would provide further detail on this issue at the meeting to be rescheduled (likely to be November 2021).</p>
22/10/2021	Email Correspondence	Comments provided on the meeting minutes issued to NSC on the 21 <sup>st</sup> September 2021.
23/11/2021	Meeting (Virtual)	<p>Meeting arranged to discuss the concerns NSC have about the EqIA.</p> <p>Data to be provided by NSC to help inform future iterations of the EqIA and discussions at the EqIA site visit to be arranged. This includes any data sources NSC believes to be relevant and appropriate to help inform future iterations of the EqIA and DCO Requirement documents (e.g. construction traffic management plans)</p>

		<p>to be produced when a formal contractor is appointed. This includes but is not limited to the following discussed on the call on Tuesday:</p> <ul style="list-style-type: none"> <li>• Traffic data on user journeys;</li> <li>• Data relevant to the nature and needs of the students;</li> <li>• Care Quality Commission Reports;</li> <li>• Roles and functions of NSC; and</li> <li>• Any other relevant information.</li> </ul> <p>A site visit will be arranged in December 2021 to discuss the EqIA.</p> <p>A meeting will be arranged to discuss the other matters outstanding NSC have relating to the scheme after the EqIA site visit takes place.</p> <p>NSC to provide a list of commitments they would like to be included in the Environmental Management Plan.</p> <p>National Highways to provide a response to NSC's request for professional fees to be covered by the scheme.</p>
25/11/2021	Email Correspondence	<p>Ian Miles requested the policy that states that National Highways are unable to provide the professional fees requested by NSC.</p> <p>Actions from the meeting on the 23<sup>rd</sup> November 2021 issued NSC.</p>
13/01/22	Meeting (on site)	<p>Meeting arranged to discuss EqIA, noise, air quality, drainage, construction access, environmental management plan, and land acquisition and compensation. National Highways position statement relating to all these issues was sent to NSC following the meeting.</p>

## Appendix F References

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- <sup>1</sup> These documents are not available in the public domain.
- <sup>2</sup> Department for Transport (March 2015), Road investment strategy: 2015 to 2020, accessed 29 January 2020, <https://www.gov.uk/government/publications/road-investment-strategy-for-the-2015-to-2020-road-period>
- <sup>3</sup> Department for Transport (March 2020), Road investment strategy: 2020 to 2025, accessed 11 March 2020, <https://www.gov.uk/government/publications/road-investment-strategy-2-ris2-2020-to-2025>
- <sup>4</sup> ONS, Mid-year population estimates, 2016
- <sup>5</sup> ONS, Mid-year population estimates, 2016
- <sup>6</sup> The Equality Act, 2010
- <sup>7</sup> ONS, Census 2011
- <sup>8</sup> ONS, Mid-year population estimates, 2016
- <sup>9</sup> National Star College, 2021. Available at: [REDACTED]
- <sup>10</sup> NTS (2015): 'National Travel Survey: England 2014', p.17. See: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457752/nts2014-01.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457752/nts2014-01.pdf)
- <sup>11</sup> Royal College of Physicians (2016) Every breath we take: the lifelong impact of air pollution, available at: [REDACTED]
- <sup>12</sup> Asthma UK, Pollution, available at: [REDACTED]
- <sup>13</sup> Transport for London, What are the implications of policies to improve the road network for local air pollution and greenhouse gas emissions? Available at: <http://content.tfl.gov.uk/technical-note-22-implications-for-local-air-pollution.pdf>
- <sup>14</sup> WHO (undated) Children and Noise, available at: [REDACTED]
- <sup>15</sup> Department for Transport (2014): 'How people travel – walking factsheet'. See: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/458420/how-people-travel-walking.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/458420/how-people-travel-walking.pdf)
- <sup>16</sup> Department for Transport, National Travel Survey: England 2015, available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457752/nts2014-01.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457752/nts2014-01.pdf)
- <sup>17</sup> British Lung Foundation (date unknown): 'How air pollution affects your children's lungs'
- <sup>18</sup> Research from Asthma UK indicates that pollution impacts children with asthma more than other age groups, as children have faster breathing rates, and their lungs are still growing.
- <sup>19</sup> Department for Transport (2015): 'Facts on young car drivers'. See: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/448039/young-car-drivers-2013-data.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/448039/young-car-drivers-2013-data.pdf)
- <sup>20</sup> Department for Transport (2015): 'Facts on young car drivers'. See: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/448039/young-car-drivers-2013-data.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/448039/young-car-drivers-2013-data.pdf)
- <sup>21</sup> Asthma UK, Pollution, available at: [REDACTED]
- <sup>22</sup> Department for Environmental Food and Rural Affairs (2013): 'Guide to UK Air Pollution Information Resources'.
- <sup>23</sup> Older people may be more susceptible to the effects of air pollution than other age groups, particularly if they have another COPD or long-term health condition. Asthma UK, Pollution, available at: [REDACTED]
- <sup>24</sup> Older Drivers Task Force (2016): 'Supporting safe driving into old age: A national older driver strategy'. See: [REDACTED]
- <sup>25</sup> Brake the road safety charity (no date): 'Older drivers'. See: [REDACTED]
- <sup>26</sup> Department for Transport (2018): 'Older car drivers road safety factsheet (2016)'. See: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/706517/ol der-car-drivers-factsheet.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/706517/ol der-car-drivers-factsheet.pdf)

- <sup>27</sup> Department for Transport (2018): 'Older car drivers road safety factsheet (2016)'. See: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/706517/older-car-drivers-factsheet.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/706517/older-car-drivers-factsheet.pdf)
- <sup>28</sup> See: <http://webarchive.nationalarchives.gov.uk/http://www.dft.gov.uk/pgr/roadsafety/research/rsrr/theme1/old-erpedestriansacriticalrev.pdf>
- <sup>29</sup> Department for Environmental Food and Rural Affairs (2013): 'Guide to UK Air Pollution Information Resources'.
- <sup>30</sup> Ofsted (2018) National Star College, available at: <https://reports.ofsted.gov.uk/inspection-reports/find-inspection-report/provider/ELS/131944>
- <sup>31</sup> Interactive Autism Network (2106), What do we know about noise sensitivity in autism? Available at: [REDACTED]
- <sup>32</sup> Interdepartmental Group on Costs and Benefits Noise Subject Group (2010) Noise & Health Valuing the Human Health Impacts of Environmental Noise available at: <http://webarchive.nationalarchives.gov.uk/20130123222346/http://archive.defra.gov.uk/environment/quality/noise/igcb/documents/igcn-noise-health-response100707.pdf>
- <sup>33</sup> I. van Kamp (2013) Noise and health in vulnerable groups: A review, available at: [REDACTED]
- <sup>34</sup> In 2016 The Papworth Trust reported that 60% of disabled people do not have a car available to their households, compared to 27% of the overall population.
- <sup>35</sup> Department for Environmental Food and Rural Affairs (2013): 'Guide to UK Air Pollution Information Resources'. See: [https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1307241318\\_Guide\\_to\\_UK\\_Air\\_Pollution\\_Information\\_Resources.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1307241318_Guide_to_UK_Air_Pollution_Information_Resources.pdf)
- <sup>36</sup> Department for Environmental Food and Rural Affairs (2013): 'Guide to UK Air Pollution Information Resources'.
- <sup>37</sup> Older people may be more susceptible to the effects of air pollution than other age groups, particularly if they have another COPD or long-term health condition. Asthma UK, Pollution, available at: [REDACTED]
- <sup>38</sup> National Star College, (2021). Understanding National Star. A briefing document for National Highways and the A417 'Missing Link' project team. Private communication.
- <sup>39</sup> British Lung Foundation (date unknown): 'How air pollution affects your children's lungs'.