

A66 Northern Trans-Pennine Project TR010062

3.10 Equalities Impact Assessment

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3.10 EQUALITIES IMPACT ASSESSMENT

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CONTENTS

1	Introduction	1
1.1	Purpose	1
1.2	Project context	2
1.3	Approach to the EqIA	2
1.4	Project management assurance – compliance with the PSED	3
2	Equality Impact Screening and Assessment	5
2.1	Overview	5
2.2	EqIA screening analysis and monitoring template	5
2.3	Project aims and purpose	5
2.4	Programme	8
2.5	Stakeholders	8
2.6	Equalities baseline	11
2.7	Consultation and engagement 2019 - 2022	20
2.8	Screening evidence conclusions	28
2.9	Assessment of potential impact on equalities groups	30
2.10	Summary of impacts by equality group	39
2.11	Desk-based research and demographic analysis	45
2.12	The EDIT Tool	45
2.13	Mitigating Action	46
2.14	Monitoring action	48
3	Glossary and Abbreviations	0
APP	PENDICES	
Α	References	
В	Figures	
B.1	Equality baseline study area	
B.2	Map of equalities receptors	
С	EDIT tool	
TAB	BLES	
Table	e 1: Project objectives	6
Table	e 2: Programme for delivery	8
	e 3: Baseline profile geographical scope	
Table	e 4: Age baseline of study area	13
Table	e 5: Where Appleby Horse Fair attendees live for most of the year (by region	າ) .14
Table	e 6: Race baseline of study area	15



Table 7: Equalities receptors	18
Table 8: Groups representing those with protected characteristics actively engage with during the consultation period in 2021	-
Table 9: Local authority responses relevant to equalities	25
Table 10: General public responses relevant to equalities	26
Table 11: Mitigation table	46
FIGURES	
Plate 3.10-1: EqIA process diagram	3
Plate 3.10-2: Project map	7



1 Introduction

1.1 Purpose

- 1.1.1 This report sets out the Equality Impact Assessment (EqIA) for the A66 Northern Trans-Pennine Project. An EqIA is a predictive assessment tool which has been undertaken to support National Highways in meeting its statutory requirements under the Public Sector Equality Duty (PSED), as set out in the Equality Act 2010¹. It is designed to ensure that projects do not discriminate against or disadvantage people, and also considers how equality can be advanced.
- 1.1.2 As a public sector organisation, National Highways, in the design and delivery of its projects has a legal duty to give due regard to the need to:
 - a. Advance equality of opportunity between people who share a protected characteristic and those who do not. This includes:
 - Removing or minimising disadvantages suffered by people due to protected characteristics.
 - ii. Taking steps to meet the needs of people with protected characteristics where these are different from the needs of other people.
 - Encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.
 - c. Foster good relations between people who share a protected characteristic and those who do not. This includes:
 - i. Tackling prejudice.
 - ii. Promoting understanding.
 - iii. Eliminating unlawful discrimination, harassment and victimisation.
- 1.1.3 This EqIA considers the potential effects of the proposed project on 'protected characteristic groups' (PCGs) defined as having 'protected characteristics' under the Equality Act 2010. These protected characteristics relate to age, sex, race, religion or faith, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, and sexual orientation.
- 1.1.4 National Highways guidance on EqIA has been used for the preparation of the assessment² which is submitted as part of the application for development consent for the Project. A range of evidence sources have been used to identify potential impacts for this EqIA including the Environmental Statement (ES) chapters for Air Quality, Cultural Heritage, Noise and Vibration and Population and Human Health.
- 1.1.5 In addition to identifying potential equality effects, the assessment also provides information on embedded mitigation for the Project that will help to minimise or eliminate potential adverse equality effects. Further actions required to reduce adverse impacts and enhance equality of opportunity for

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¹ Section 149 of the Equality Act 2010.

² National Highways (2017) Equality Impact Screening and Assessment (EqIA) Overview and Guidance: Helping You to Consider the Needs of People



equality groups are also set out. In doing so, this EqIA demonstrates National Highways' due regard to the Equality Act 2010 and the associated PSED.

1.2 Project context

- 1.2.1 The existing A66 is a key national and regional strategic link for a range of travel movements. It carries high levels of freight traffic and is an important route for tourism and connectivity for nearby communities. There are no direct rail alternatives for passenger or freight movements along the corridor.
- 1.2.2 Despite the strategic importance of the A66, the route between the M6 at Penrith and the A1(M) at Scotch Corner is only intermittently dualled and has six separate sections of single carriageway. The route also carries local slow moving agricultural and other traffic making short journeys, which can have an impact on other users, especially on the single carriageway sections. The variable road standards, together with the lack of available diversionary routes when incidents occur, affects road safety, reliability, resilience, and attractiveness of the route.
- 1.2.3 If the existing A66 route is not improved, it will constrain national and regional connectivity and may threaten the transformational growth envisaged by the Northern Powerhouse agenda and the achievement of the Government levelling up agenda.

1.3 Approach to the EqIA

- 1.3.1 National Highways guidance on EqIA² has been used for the preparation of the EqIA report. The EqIA is considered to be a live document for the Project and is updated throughout the development of the Project from conception to operation stages.
- 1.3.2 Plate 3.10-1 shows the process followed for the EqIA starting with the screening of equality impacts. An EqIA screening was initially completed at the options stage of the Project development and identified that equality impacts were likely to be a consideration in the development of the Project. As such, the decision to carry out a full Equality Impact Assessment was made.
- 1.3.3 National Highways EqIA screening, analysis and monitoring template has been completed and is included as section 2 of this document. This includes evidence gathered to inform the screening and overall assessment. Sources of evidence used to assess potential equality impacts for the EqIA include relevant information within the Environmental Statement (Application Document 3.1-3.4), the Consultation Report (Application Document 4.4) and the Environmental Management Plan (Application Document 2.7) for the Project.



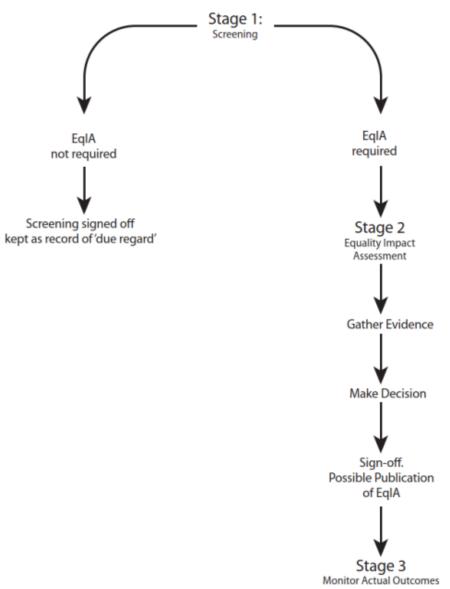


Plate 3.10-1: EqIA process diagram

1.4 Project management assurance – compliance with the PSED

- 1.4.1 Due regard has been paid to the PSED in relation to the Project, including, but not limited to, the management of the workforce, the design of the Project and the development consent order process. Evidence of this includes:
 - Use of Design Manual for Roads and Bridges (DMRB) guidance, with reference to Vol. 0 (Introduction) which contains advice on Equality, Diversity and Inclusion³.
 - b. The design of the Project follows the ten principles set out in National Highways 'The Road to Good Design⁴'. This centres on the themes of

Planning Inspectorate Scheme Reference: TR010062 Application Document Reference: TR010062/APP/3.10

³ National Highways. Design Manual for Roads and Bridges

⁴ National Highways (2018) The Road to Good Design



- connecting people, places and processes, encouraging better design and providing a basis for road projects to be objectively reviewed at key stages of development.
- c. Regular meetings, communication and reviews with National Highways Equality, Diversity and Inclusion (EDI) advocate for major projects.
- d. Continued interaction between the stakeholder engagement team, the lands engagement team and the EqIA authors.
- e. Development of an Inclusion Action Plan for the Project. This is reviewed and updated on a quarterly basis providing evidence to support National Highways reporting requirements with regards to equalities.



2 Equality Impact Screening and Assessment

2.1 Overview

2.1.1 This section incorporates the screening, assessment, mitigation and monitoring of equality effects of the Project using National Highways standard EqIA, Screening Analysis and Monitoring template. The assessment considers how the Project could directly impact and contribute to equality effects for PCGs.

2.2 EqIA screening analysis and monitoring template

Equality Impact Assessment (EqIA) Screening Analysis and Monitoring Template

Before carrying out an Equality Impact Screening or Assessment familiarise yourself with National Highways' 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									
Name of Practice/Policy	A66 Northern Trans- Pennine Project	Proposed or Current Proposed								
Person(s) Completion	ng the Assessment	Kate Hardy (Arup)								
		Kieron Hyams (Arup) Alice Bennett (Arup)								
Directorate		Major Projects								
Date: April 2022		Eql Register Ref No: (Obtained from the EDI Advocate)	MPS88							

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.

2.3 Project aims and purpose

The existing A66 is a key national and regional strategic transport corridor and link for a range of travel movements. It carries high levels of freight traffic and is an important route



for tourism and connectivity for nearby communities. There are no direct rail alternatives for passenger or freight movements along the corridor.

Despite the strategic importance of the A66, the route between the M6 at Penrith and the A1(M) at Scotch Corner is only intermittently dualled and has six separate sections of single carriageway. The route carries local slow moving agricultural and other traffic making short journeys, which impacts road speeds and capacity, detrimentally impacting on other users, especially on the single carriageway sections. The variable road standards, together with the lack of available diversionary routes when incidents occur, affects road safety, reliability, resilience and attractiveness of the route.

Despite several upgrades to the route since the 1970s, the A66 still suffers from congestion, unreliable journey times and a higher-than-average number of accidents. Poor weather can severely impact conditions on the road, resulting in closures which are frustrating for road users, including hauliers, missing key connections.

If the existing A66 route is not improved, it will constrain national and regional connectivity and may threaten the transformational growth envisaged by the Northern Powerhouse initiative and the achievement of the Government levelling up agenda.

The A66 is the most direct route between the Tees Valley, north, south and west Yorkshire, the East Midlands, eastern England, north Cumbria, and the central belt of Scotland and Cairnryan (for access to Ireland).

The need for improvements to the A66 corridor was identified in the Northern Trans-Pennine Routes Strategic Study Stage 3 Report (NTPRSS) announced as part of the first Road Investment Strategy (RIS1) in December 2014 (Department for Transport, 2015) ('DfT'). The study was one of six national strategic studies. Funding for the A66 corridor improvements was committed to in the Road Investment Strategy 2 (RIS2) in March 2020 (DfT, 2020).

The objectives of the Project are set out in Table 1 below.

Table 1: Project objectives

Theme	Project Objectives
Economic	Regional: Support the economic growth objectives of the Northern Powerhouse and Government levelling up agenda.
	Ensure the improvement and long-term development of the SRN through providing better national connectivity including freight.
	Maintain and improve access for tourism served by the A66.
	Seek to improve access to services and jobs for local road users and the local community.
Transport	Improve road safety, during construction, operation, and maintenance for all, including road users, Non-Motorised Users (NMU), road workers and local residents.
	Improve journey time reliability for road users.
	Improve and promote the A66 as a strategic connection for all traffic.



Improve the resilience of the route to the impact of events such as incidents, roadworks, and severe weather events.					
		Seek to improve NMU provision along the route.			
	Community	Reduce the impact of the route on severance for local communities.			
		Minimise adverse impacts on the environment and where possible optimise environmental improvement opportunities.			

The Project is made up of a number of schemes. The location of these is shown on the project map below. A full description of the works for each scheme can be found in the ES (3.02 Environmental Statement, Volume 1 (Main Report), Section 2.6):

- M6 Junction 40 to Kemplay Bank
- Penrith to Temple Sowerby
- Temple Sowerby to Appleby
- Appleby to Brough
- Bowes Bypass
- Cross Lanes to Rokeby
- Stephen Bank to Carkin Moor
- A1(M) Junction 53 Scotch Corner

Overall Project Map

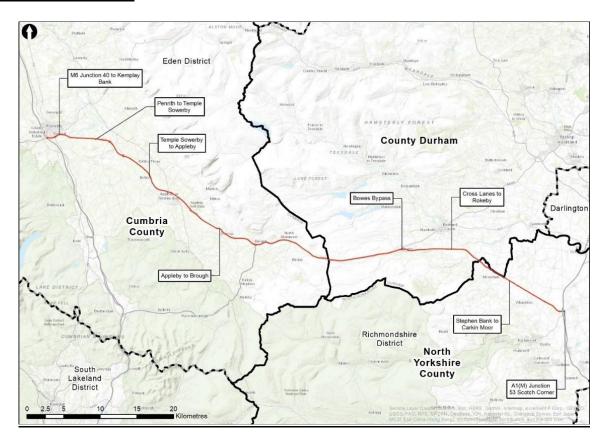


Plate 3.10-2: Project map



2.4 Programme

The following programme has been established for delivery of the Project:

Table 2: Programme for delivery

Milestone	Indicative programme			
DCO submission	Mid- 2022			
Site establishment	Late 2023			
Start of main works	Early 2024			
Full Project open to traffic	2029			

2.5 Stakeholders

Key stakeholders that have been identified and engaged with to date across the Project include:

- Local Authority officers (including representatives from Cumbria County Council, Eden District Council, Durham County Council, North Yorkshire County Council, and Richmondshire District Council)
- Business, Freight & Ports (including representatives from the Federation of Small Businesses, the Road Haulage Association, Logistics UK and local enterprise partnerships and chambers of commerce along the route)
- Landowners
- Non-Motorised Users (including representatives from Sustrans, Cycling UK, the British Horse Society and local and regional walking, cycling and horse-riding organisations along the route)
- Emergency and public services (including representatives from the local authorities and police and ambulance services along the route)
- MPs and Local Authority Councillors
- Town & Parish Councils
- Local Businesses
- Strategic environmental bodies (Environment Agency, Historic England, and Natural England)
- Environmental interest groups (including representatives from the Forestry Commission, the North Yorkshire Area of Outstanding Natural Beauty (AONB), Yorkshire Dales National Park Authority), the National Farmers Union, and wildlife trusts and river trusts along the route
- Equalities interest groups (including representatives from the local authorities, access groups, youth groups and representatives of the gypsy and traveller communities).

Early engagement 2019

Early engagement started in March 2019 to better understand any constraints as well as priorities for local people and road users around the proposed options for potential dualling. This work built on engagement in previous stages of the Project. A planned and focused approach was adopted to ensure high quality and meaningful engagement. This



provided opportunities for sharing complex and technical information and facilitated relationship building with key stakeholders.

From the outset, the team recognised the need for early engagement and undertook a number of meetings with key stakeholders prior to the consultation period. These included the local authorities along the Project, the strategic environmental bodies, and other national, regional and local bodies and interest groups (such as Tees Valley Combined Authority, Transport for the North, Freight Transport Authority).

Meetings were held with landowners that would be affected by the Project and focus groups were held with stakeholders spanning business, freight and ports, local authorities, emergency services and environmental interest groups.

B: SCREENING (Stage 2) Questions considered to establish impacts from the outset for new or changing policies/practices	Sex	Religion or Belief	Age	Disability	Race	Sexual Orientation	Gender Re-assignment (include transsexual and transgender)	Pregnancy & Maternity	Marriage & Civil Partnership
1: Is there any indication or evidence that different groups have different needs, experiences, issues, or priorities in relation to the practice/policy?	N	N	Y	Y	Y	N	N	Y	N
2: Is there evidence or an indication of higher or lower uptake by different groups?	N	N	Y	Y	Y	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	Y	N	N	Y	Z
4: Is there an opportunity to advance equality or foster good relations by altering the policy/practice?	N	N	Y	Y	Y	N	N	Y	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	Y	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	Y	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	N	N	Y	Y	Y	N	N	Y	N



harm good relations between different groups?									
8: Is there any potential for, or evidence that any part of the policy/practice could discriminate indirectly or directly? (Consider those who implement it on a daily basis).	N	N	Y	Y	Υ	N	N	Υ	N



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

Sections 2.6 to 2.8 below outline the evidence on which the screening decision in Section B is based on and include evidence from:

- An equalities baseline drawn from:
 - National Highways' EDIT (Equality, Diversity Inclusion Tool)
 - existing published data sets
- Findings from the Environmental Impact Assessment
- Feedback received through engagement and consultation activities

2.6 Equalities baseline

Introduction

The equalities baseline provides a profile of residents living in the area surrounding the proposed Project. It draws upon the Census 2011 and other datasets from the Office for National Statistics (ONS), as well as survey work undertaken for the A66 project to identify, in particular, the level and distribution of people with protected characteristics living within the area.

Certain areas along the Project, including locations at Appleby and Brough/Warcop are of national importance for the gypsy and traveller community. Although the baseline data profile below indicates that this population is generally transient in the community, rather than resident, this baseline profile also takes into consideration the protected characteristics of this group.

Equality, Diversity and Inclusion Tool (EDIT)

The EDIT tool uses hot spot mapping, project type and design information to identify whether it is likely that equality, diversity and inclusion issues are likely to be a factor in the effective delivery of a highways project. An overall score is calculated based on the information provided, with a score of over 60% recommending consideration for the need to undertake an EqIA. An overall EDIT score of 78% was generated for the Project at the screening stage in April 2018. This meant that equality, diversity and inclusion issues were likely to be a factor in the effective delivery of the Project and that an EqIA should be considered.

The EDIT exercise highlighted that the majority of the A66 corridor has low numbers and proportions of people from equality groups (groups of people with protected characteristics), and low levels of access by people from equality groups. However, there are small pockets of higher numbers of equality groups in locations such as Penrith, Appleby, Barnard Castle and Scotch Corner which will be monitored and reviewed as we progress throughout the Project development in accordance with our ongoing PSED and will continue following the DCO process. This will ensure that the Project considers equality, diversity and inclusion issues during the detailed design and delivery of the Project.



Study area

The geographical scope of the baseline data for the protected characteristic group analysis has included the following areas and scales:

Table 3: Baseline profile geographical scope

Geographical scale	Area
National	England
Regional	North East and North West
County	Cumbria, North Yorkshire
Unitary Authority	County Durham,
Local Authority District	Eden, Richmondshire
Lower Super Output Areas (LSOAs)	County Durham 065B, Eden 001D, Eden 003B, Eden 003C, Eden 003D, Eden 004A, Eden 004B, Eden 004G, Eden 005B, Eden 006A, Eden 006B, Eden 006C, Eden 006D, Eden 006E, Eden 007A, Eden 007E, Richmondshire 001C, Richmondshire 001E, Richmondshire 001F

A figure showing the baseline study area is provided in Appendix A.1

Data used for the baseline analysis has consisted of data provided by the Office for National Statistics (ONS) via the UK government's National Online Manpower Management Information System (NOMIS). NOMIS is a service provided by the ONS to give free access to the most detailed and up-to-date UK labour market statistics from official sources and 2011 census data.

Protected characteristic groups

Age

The study area is characterised by a more elderly population, with a generally higher than national, regional, county, unitary and local authority district average percentage of residents over 65 years old. At the time of the 2011 census, communities along the Project with particularly high averages of residents over 65 years old included clusters in and around the settlement of Penrith and an area in Appleby-in-Westmorland and Middleton Tyas (settlement adjacent to Scotch Corner). These include Lower Super Output Areas (LSOAs) Eden 003B (southern edge of Penrith town centre – which may be linked to the presence of the Winters Park retirement home in this LSOA), Eden 004A (south of Penrith), Eden 004G (south corner of Penrith), Eden 005B (west of Penrith), Eden 006A (Appleby-in-Westmorland) and Richmondshire 001E (Middleton Tyas) at 29%, 29%, 30%, 25%, 32% and 32%, respectively, in comparison to the national average of 16% (see Table 4 below).

Within the study area the communities tend to have much lower than national, regional, county, unitary and local authority district averages of residents aged under 16-year-olds. At the time of the 2011 census, the communities with a younger age profile tended to be associated with more urban areas such as the settlements of Penrith and Kirkby Thore.



These include LSOAs Eden 003D and Eden 006D both at 20%, slightly higher than the national average of 19% (see Table 4 below).

Table 4: Age baseline of study area

	Unde	r 16	16 - 64		Ove	r 65
	total	%	total	%	total	%
England	10,022,836	19%	34,329,091	65%	8,660,529	16%
North East	462,437	18%	1,684,964	65%	449,485	17%
North West	1,324,548	19%	4,556,474	65%	1,171,155	17%
Cumbria	83,499	17%	313,470	63%	102,889	21%
North Yorkshire	103,705	17%	371,472	62%	123,199	21%
County Durham	87,984	17%	332,913	65%	92,345	18%
Eden	8,588	16%	32,447	62%	11,529	22%
Richmondshire	9,267	18%	33,622	65%	9,076	17%
County Durham 065B	202	15%	920	66%	268	19%
Eden 001D	264	17%	995	64%	303	19%
Eden 003B	208	15%	789	56%	401	29%
Eden 003C	178	16%	711	63%	245	22%
Eden 003D	297	20%	1,043	69%	182	12%
Eden 004A	192	13%	837	58%	418	29%
Eden 004B	237	15%	931	60%	372	24%
Eden 004G	227	17%	733	54%	402	30%
Eden 005B	216	15%	863	60%	359	25%
Eden 006A	176	14%	704	54%	413	32%
Eden 006B	315	18%	1,051	60%	389	22%
Eden 006C	250	18%	868	62%	278	20%
Eden 006D	306	20%	1,000	64%	257	16%
Eden 006E	193	16%	727	60%	282	23%
Eden 007A	381	17%	1,420	62%	492	21%
Eden 007E	220	16%	814	60%	318	24%
Richmondshire 001C	173	15%	739	62%	272	23%
Richmondshire 001E	174	15%	627	53%	382	32%
Richmondshire 001F	197	15%	866	66%	246	19%



Gender

Across the study area, the communities are characterised by a gender split which is equal to that of the national average where the female to male population average is 51% to 49%. At the time of the 2011 census, the community with the highest percentage of females was located within the southern edge of Penrith town centre, LSOA Eden 003B at 55% compared to males at 45%. Eden 003B is also amongst the LSOAs described above to have a higher percentage of over 65 years old, which may describe the higher percentage of females, as females tend to outlive males.

Race

In terms of race, the study area is predominantly 'White', with all the communities in the LSOAs averaging between 98% - 100% 'White'. As a comparator, this is significantly higher than the national average of 85% but is similar to the north-east and north-west region averages at 95% and 90%, respectively. Similar to the LSOAs, county, unitary and local authority district averages range between 95% - 99% 'White'.

At the time of the 2011 census, a small number of 'White: Gypsy or Irish Traveller' residents were located to the west of Penrith, east of Appleby-in-Westmorland and Middleton Tyas (settlement adjacent to Scotch Corner), at LSOAs Eden 005B, Eden 007E and Richmondshire 001E. However, it must be noted that these small numbers only represent 2-3 people in real terms. It should also be noted that as the 2011 census data is a point in time snapshot of the population, and due to the nomadic lifestyle of the Gypsy and Traveller community, the data may not be representative of actual spatial distribution and movement patterns of the community. Additionally, given their nomadic lifestyle, the Gypsy and Traveller community may not have completed the census.

Appleby Horse Fair, a historic gathering of Gypsies and Travellers, takes place within the study area at Appleby-in-Westmorland. It traditionally takes place in the first week of June. It is believed to be the largest Horse Fair in Europe attracting up to 10,000 Gypsies and Travellers and over 20,000 visitors each year⁵. For the Gypsy and Traveller community, Appleby Horse Fair is a major cultural event with attendees from all over the UK and abroad coming to show and trade horses, meet family and friends, and sustain traditions. The fair was originally held in Appleby-in-Westmorland Town Centre, but as it grew, it moved out to a site known as Fair Hill, which is located to the north of the A66, and immediately adjacent to it.

During 248 face-to-face surveys carried out at Appleby Horse Fair in 2007⁶, most respondents came under the broad ethnic category of Romany Gypsy (English) but also included a broad range of different groups including Irish Travellers, Welsh and Scottish Gypsies/Travellers, New Travellers and Show people. During the same survey, 167 respondents gave information on where they live for most of the year, with the majority coming from the North-West and the East Midlands region (see Table 5 below). The survey also found the most common method of travelling to Appleby Horse Fair to be with a touring caravan (63%), followed by car/van only (27%) and traditional horse drawn caravan (13%). With regards to route taken, a large number of people use the M1 or M6, then the A66.



Table 5: Where Appleby Horse Fair attendees live for most of the year (by region)

Region	No.	%
North West	53	31
East Midlands	38	22
Yorkshire and	18	11
Humberside		
North East	15	9
East	13	8
South East	10	6
West Midlands	8	5
Ireland	6	4
Scotland	6	4
Total	167	100

(Source: Cumbria Gypsy and Traveller Accommodation Needs Assessment)

Brough Hill Fair is an annual Gypsy and Traveller fair held in September at a site approximately 1.2km to the east of Warcop and adjacent to the southern edge of the A66. A horse Fair has been held in the local area for over 700 years and the Gypsy Community have has a long-standing historic association with the fair. Attendance at the current Fair though is low. Last year approximately 10 caravans attended, but this was during the pandemic and the weather was poor. Conversations with a representative of the Gypsy community suggest that this is due to the poor accessibility and location of the current fair site adjacent to the A66, coupled with the increasing popularity of the Appleby Horse Fair.

An authorised Gypsy and Traveller site is located approx. 500m to the south of the Scotch Corner junction where the A66 and the A1(M) meet. The site is identified in the Richmondshire District Council 'Gypsies and Travellers Accommodation Assessment (Oct 2012)⁷ as the Blue Anchor site. In 2013 the site had 8 pitches and was privately owned and managed by a family member.

Compared to national and regional averages, there are minimal numbers of other races across the study area. A small pocket of the population identifies as 'Mixed' and are located to the north-east of Penrith within Langwathby (LSOA Eden 001D) and to the north of Richmond (LSOA Richmondshire 001C). Within the centre of Penrith, there is a small population with a higher percentage of the population who identify as 'Asian' (LSOA Eden 003C) than across the rest of the Project. Across the study area, those who identify as 'Black' in the population is particularly low, a small group of 'Black' residents live in Middleton Tyas (settlement adjacent to Scotch Corner) in LSOA Richmondshire 001E. See Table 6 below for further information.

Planning Inspectorate Scheme Reference: TR010062 Application Document Reference: TR010062/APP/3.10

⁵ Multi-Agency Strategic Co-ordinating Group (2019) Appleby Fair Strategy 2019-2022

⁶ University of Salford (2008) Cumbria Gypsy and Traveller Accommodation Needs Assessment'

⁷ Richmondshire District Council (2013) Gypsies and Travellers Accommodation Assessment



Table 6: Race baseline of study area

rable 6: R	ace baseliı	ne of Study								
	White		White: Gypsy or Irish Traveller		Mixed		Asian		Black	
	Total	%	Total	%	Total	%	Total	%	Total	%
England	45,281, 142	85.42	54,895	0.10	1,192,8 79	2.25	4,143,4 03	7.82	1,846, 614	3.48
North East	247,55 67	95.33	1,684	0.06	22,449	0.86	74,599	2.87	13,220	0.51
North West	6,361,7 16	90.21	4,147	0.06	110,89 1	1.57	437,48 5	6.20	97,869	1.39
Cumbri a	492,25 7	98.48	315	0.06	2,504	0.50	4,066	0.81	579	0.12
North Yorkshir e	582,47 5	97.34	588	0.10	5,043	0.84	7,356	1.23	2,424	0.41
County Durham	503,76 9	98.15	467	0.09	3094	0.60	4,856	0.95	701	0.14
Eden	51,999	98.93	15	0.03	211	0.40	292	0.56	22	0.04
Richmo ndshire	49,556	95.36	19	0.04	502	0.97	1,247	2.40	496	0.95
County Durham 065B	1,377	99.06	0	0.00	6	0.43	7	0.50	0	0.00
Eden 001D	1,550	99.23	0	0.00	11	0.70	1	0.06	0	0.00
Eden 003B	1,385	99.07	0	0.00	7	0.50	6	0.43	0	0.00
Eden 003C	1,112	98.06	0	0.00	3	0.26	19	1.68	0	0.00
Eden 003D	1,502	98.69	1	0.07	6	0.39	14	0.92	0	0.00
Eden 004A	1,427	98.62	0	0.00	6	0.4	12	0.83	0	0.00
Eden 004B	1,524	98.96	0	0.00	8	0.52	5	0.32	1	0.06
Eden 004G	1,353	99.34	0	0.00	3	0.22	3	0.22	1	0.07
Eden 005B	1,424	99.03	3	0.21	3	0.21	10	0.70	0	0.00
Eden 006A	1,279	98.92	0	0.00	5	0.39	9	0.70	0	0.00



Eden 006B	1,741	99.20	0	0.00	7	0.40	5	0.28	2	0.11
Eden 006C	1,387	99.36	0	0.00	5	0.36	1	0.07	2	0.14
Eden 006D	1,556	99.55	1	0.06	3	0.19	4	0.26	0	0.00
Eden 006E	1,194	99.33	1	0.08	5	0.42	3	0.25	0	0.00
Eden 007A	2,281	99.48	0	0.00	3	0.13	7	0.31	2	0.09
Eden 007E	1,343	99.33	2	0.15	4	0.30	3	0.22	1	0.07
Richmo ndshire 001C	1,176	99.32	1	0.08	7	0.59	0	0.00	1	0.08
Richmo ndshire 001E	1,154	97.55	2	0.17	3	0.25	9	0.76	6	0.51
Richmo ndshire 001F	1,289	98.47	0	0.00	7	0.53	11	0.84	2	0.15

Religion/belief

The study area is characterised by a population who predominantly identify as 'Has religion', with the prevailing religion being 'Christian' which sits slightly above the national average. At the time of the 2011 census, communities in the vicinity of the Project with particularly high averages of residents who identify as 'Christian' included clusters in and around the settlement of Penrith, an area in Appleby-in-Westmorland, an area to the north of Richmond and an area to the south-east of Barnard Castle. These include LSOAs Eden 003B (southern edge of Penrith town centre), Eden 004B (eastern edge of Penrith), Eden 004G (south corner of Penrith), Eden 005B (west of Penrith), Eden 006B (Appleby-in-Westmorland), Richmondshire 001C (north of Richmond) and Richmondshire 001F (south-east of Barnard Castle at 75%, 76%, 76%, 75%, 75%, 80% and 77% respectively, in comparison to the national average of 59%.

Disability

In terms of disability, the population within the study area with 'Long-term health problem or disability' and reporting 'Day-to-day activities limited a lot' is low. At the time of the 2011 census, one community in Penrith had a particularly high percentage of the population reporting their 'Day-to-day activities limited a lot' (LSOA Eden 003B) at 16% compared to the national average of 8%. This higher percentage is most likely linked to the higher-than-average percentage of over 65-year-olds located in this community (as reported above) and the propensity for health problems and disability associated with older age.

Benefit claimant for disability living allowance information from November 2018 reveals that within the study area, claims are on average lower than the national average. As



above, claims for the same population in Penrith (LSOA Eden 003B) are higher than all the other LSOAs in the study area at 3.22%. Interestingly, of these total claims in Eden 003B, male claims are higher at 2.15% compared to 1.07% for females.

Pregnancy and maternity

No data is available on pregnancy and maternity in the study area.

Deprivation

In terms of deprivation, the study area is characterised by a population who fall towards the least deprived in the Index of Multiple Deprivation (IMD) decile. The IMD is the official measure of relative deprivation in England and is part of a suite of outputs that form the Indices of Deprivation (IoD). At the time of the most recent IMD update in 2019, one community in the centre of Penrith (Eden 003C) was ranked amongst the 30% most deprived LSOAs. In comparison, three communities within Penrith are ranked as some of the least deprived LSOAs in the country (LSOAs Eden 004A, Eden 004B and Eden 004G).

Across the study area, one of the deprivation indices with a high number of communities ranked amongst the most deprived 10% is 'Barriers to Housing and Services'. These communities include areas to the south of Barnard Castle (County Durham 065B), south of Kirkby Thore (Eden 006C), Brough and the surrounding countryside (Eden 007A), Warcop and the surrounding countryside (Eden 007E), north of Richmond (Richmondshire 001C) and south-east of Barnard Castle (Richmondshire 001F). A common theme between these communities is their rural nature, which is likely a key cause for barriers to housing and services.

Another deprivation index with a high number of the study area communities ranked amongst the most deprived 10% is 'Indoors Living Environment'. The 'indoors' living environment measures the quality of housing. Communities in the most 10% deprived include areas to the south of Barnard Castle (County Durham 065B), north east of Penrith within Langwathby (Eden 001D), centre of Penrith (Eden 003C), west of Penrith (Eden 005B), south of Kirkby Thore (Eden 006C), outskirts of Penrith and the centre of Kirkby Thore (Eden 006D), south east of Kirkby Thore (Eden 006E), Brough and the surrounding countryside (Eden 007A), Warcop and the surrounding countryside (Eden 007E) and north of Richmond (Richmondshire 001C). Again, as above, most of these communities are more rural in nature.

Other Groups with Protected Characteristics

Having considered the likely impacts of the project, it is considered unlikely that the proposed Project would result in any differential impacts on groups with the following protected characteristics; gender reassignment, sexual orientation and marriage/civil partnership and as such, these groups have not been included in the baseline.

Potential equalities receptors

A baseline review has identified certain locations where there are groupings of individuals with protected characteristics that may be more likely to experience disproportionate or differential equalities effects. These receptors are listed in Table 7 below, shown on Figure 3.10.3 in Appendix A.2.



Group	Location
Group	Location
Race – Gypsy and Traveller	Appleby Horse Fair, fairground at Fair Hill (adjacent to the existing A66)
community	Brough Hill Fair ground at Warcop, to the immediate south of the A66 (directly affected).
	Scotch Corner Gypsy and Traveller site (approx. 500m to the south of Scotch Corner and unlikely to be directly affected)
Age - Elderly	Winters Park Residential Care Home at Penrith (approx. 150m to the north of the A66). The home caters for those with dementia. Dementia can worsen the effects of sensory changes by altering how the person perceives external stimuli, such as noise and light.
Age – Young	Various Primary Schools throughout the Project. Schools within the 500m study area of the Project include:
	North Lakes Primary School at Penrith
	Hunter Hall School at Penrith
	Temple Sowerby Church of England Primary School
	Kirkby Thore Primary School
	Appleby Primary School
	Brough Primary School
	Bowes Hutchinson Church of England Primary School
	A number of children's nursery's including:
	Kiddlywinks nursery at The Old Stables, Penrith
	Kiddlywinks nursery at Eamont House, Penrith
	Kiddlywinks nursery's provide care and education for children aged 3 months to 5 years and holiday care for children up to 8 years of age.
	Secondary Schools including:
	Ullswater Community College at Penrith
	Appleby Grammar School
	The Happy Hooves Riding Centre at Penrith (approx. 150m to the south of the A66 and directly affected by land take) hosts the Changing Lives Through Horses Programme, under the auspices of the British Horse Society (BHS). This is a programme for people who are disengaged from school. Children learn the skills they would otherwise learn in a classroom at Happy Hooves. Activities like weighing feed are used to teach children mathematics, for example. The programme is aimed at young people in secondary school education.
Religion	Various churches and religious centres throughout the Project, including:



	Kingdom Hall of Jehovah's Witnesses at Penrith (adjacent to area of direct impact)
	St James Church at Temple Sowerby
	St Michaels Church at Kirkby Thore
	Methodist church at Kirkby Thore
	St Giles Church at Bowes
	St Mary's Church at Rokeby
Those with disabilities	Happy Hooves riding Centre (approx. 150m to the south of the A66 and directly affected by land take) which has Riding for the Disabled Association (RDA) provision and caters for riders with a range of disabilities, including cerebral palsy, learning difficulties and autism and across a wide range of ages. As well as the real-life horses they offer the Mr Williams RDA programme simulator, which allows people with disabilities to reap the benefits of horse riding in a safe environment. It is suitable for users aged from 4+ years and can be used by people affected by cerebral palsy, autism and a wide range of other conditions.
	Llama Karma Café, Brougham, that previously provided animal assisted therapy for disabled or disadvantaged adults or children (this business is directly affected by land take). The venue has been closed since autumn 2021, having been purchased by agreement with the owners following early consultation with National Highways. It has been confirmed that the majority of the previous customers and clients are now served by a mobile animal therapy service.
	Sunbeams Music Trust at Stoller House, Penrith (This lies approximately 500m beyond the western extent of the defined study area for the 'M6 Junction 40 to Kemplay Bank' scheme, but adjacent to the A66 junction with the A592). The centre provides Community Music to children and adults with a wide range of disabilities and complex medical needs including physical disabilities and mental health problems, Alzheimer's and senile dementia, cerebral palsy, autism, Down's Syndrome, sensory impairments, emotional and behavioural disturbance and profound multiple disabilities. People on the autistic spectrum particularly can be very sensitive to change, particularly in the sensory environment (noise, visual etc), and changes to routines may cause distress.
Deprivation	No notable receptors identified

2.7 Consultation and engagement 2019 - 2022

Engagement with key stakeholders has been ongoing for many years, with the Project team extensively engaging with a wide range of stakeholder groups, including landowners, local communities, and representatives of seldom heard groups such as the Gypsy and Traveller community in order to share evolving designs, understand feedback and amend the emerging design. The section below provides a summary of the key engagement and consultation undertaken over the period 2019-2022, with particular regard to issues raised in relation to potential equality impacts.



Early Consultation 2019

In March 2019, prior to the pre-election period, a period of awareness raising was undertaken to alert local people to the forthcoming consultation events. This activity took the form of advertisements in local newspapers Northern Echo, Teeside Gazette and the Cumberland and Westmorland Herald and flyers distributed through deposit points in publicly accessible buildings along the Project.

The options consultation period ran from 16 May 2019 – 11 Jul 2019.

In total, 21 consultation events were held during the consultation period to allow the local community to speak with the project team. Twenty of these events were open to the public and one targeted event was held for the members of staff at Center Parcs as a major local employer. Further details can be found in the Consultation Report (Application Document 4.4).

Engagement activity between May 2020 and September 2021

An announcement and consultation on the Preferred Route happened in Spring 2020, having considered various factors including the response to the consultation on options.

Ongoing engagement was undertaken between May 2020 and September 2021(prestatutory consultation engagement). Further detail can be found in Chapter 3 of the Consultation Report (Application Document 4.4). Ongoing engagement included the following:

- Strategic Stakeholder Group engagement
- Engagement with landowners and agents
- Community Liaison Groups and engagement with parish councils
- Engagement with focus groups and other special interest groups groups representing equality groups, in attendance at these meetings, included the Multi Agency Strategic Coordinating Group (Eden District Council); Local Access Forum – Cumbria and Lakes Joint; Local Access Forum – Durham; North Yorkshire Local Access Forum; and the Appleby Traveller Lead.
- Engagement with statutory environmental bodies, including the technical working groups
- Engagement with local authorities Meetings on Equality and Diversity were held with representatives from Cumbria County Council, Eden District Council and Durham County Council in July 2021 ahead of the statutory consultation. These meetings were used to identify key Seldom Heard Groups in their local area and ensure that these groups were suitably engaged with during consultation. A full list of those equality groups engaged with is provided at Table 6 below.
- Engagement with Councillors and MPs
- Engagement with the Planning Inspectorate

A project update activity was held from 16 November to 15th December 2020 to provide further information about the emerging design and, especially, the new junctions along the route. Ongoing social distancing measures following the initial Covid-19 lockdown period meant activities were predominantly online. To maximise accessibility over the update period, we also had a phone number for those who wanted to speak to the project team



and posted hard copies of the brochure, on request, to those without internet access who requested a copy. An awareness-raising leaflet was sent to households within 2.5km of the whole route to publicise the upcoming Project update. Posters were also sent to local public and community facilities to be displayed. An email was sent to stakeholders and statutory consultees to inform them of the upcoming Project update. A virtual consultation room was set up, with information, videos and a live chat function for visitors to ask questions to the project team

Ongoing engagement with Kirkby Thore School

Engagement with Kirkby Thore Primary School has been ongoing throughout the development of the project, from 2019 through to 2022. Engagement has included:

- Engagement/education sessions with pupils including a session on how drones are used in remote site surveying.
- Responding to queries and questions raised by parents of pupils.
- Active engagement with the head teacher including direct communication by email and phone, to keep them up to date on current design developments.

Ongoing engagement with the Gypsy and Traveller communities

The project team have worked hard to engage with the Gypsy and Traveller community in the local area, in recognition of the cultural importance of the Appleby Horse Fair and Brough Hill Fair. Consultation with the *Shera Rom* or Head Gypsy who represents the interests of the Gypsy and Traveller community in the local area has been ongoing throughout the life of the Project.

A full summary of the consultation that has taken place with the community is provided in the 'Statement of Common Ground with representatives of the Travellers Community'⁸ (Application Document 4.5). Engagement has included:

- Correspondence by email, letter, phone calls and face-to-face meetings have been
 ongoing throughout the Project. The aim has been to make the community aware
 of consultation events (locations and timings); directly provide literature and
 information around project proposals; assist with questions on completing feedback
 forms; and ensure a response to statutory consultation was received from the
 Gypsy and Traveller community.
- Ongoing engagement around any potential impacts on the Appleby Horse Fair site.
 The outcomes of these conversations have directly influenced the development of Project design.
- Ongoing engagement around the relocation of Brough Hill Fair, including detailed discussions and on-site meetings around proposed alternative sites and ensuring that any alternative site meets the requirements and needs of the Gypsy and Traveller population.

Statutory Consultation 2021

Statutory consultation on the Project, in compliance with the requirements of the Planning Act 2008, was undertaken between the 24^{th of} September and the 6th of November 2021.

Planning Inspectorate Scheme Reference: TR010062 Application Document Reference: TR010062/APP/3.10

⁸ It should be noted that this a draft document that is still to be signed off by the affected parties.



Careful consideration was given to ensure there was a full opportunity to engage with the Project and the environmental information, in a way that allowed people to understand, influence and contribute to its development. As part of the consultation, we provided a number of avenues to share information with and listen to and gather feedback from the local community including but not limited to digital consultation and face-to-face events, virtual Q&A events and local community visits.

How the views of stakeholders have been taken into account has been explained in the Consultation Report (Application Document 4.4). The Consultation Report identifies how we have responded to the issues raised at statutory consultation, key topics raised during pre-consultation engagement and where we considered it appropriate to make changes. The methods of engagement are outlined, in full, in the Project's 'Statement of Community Consultation' and included:

- Public consultation events within community spaces along the Project
- Digital Engagement including a virtual consultation room
- Digital communication tools including a fly through animation of the Project; various design and environmental constraints animations; and talking head videos on the National Highways website. We also had the Sound Lab tool available at all event venues except Kirkby Thore.
- Engagement van to visit local communities
- Virtual Q&A events
- Project webpage
- Exhibition boards
- Public consultation brochure and map booklet
- Project leaflet notification
- Letter/email notification
- Statutory notice and letter notification
- Email alert
- Poster and leaflet -shared with local community facilities. This included shops, medical centres, libraries, garden centres, schools and cafes.
- Landowner engagement
- Community liaison group briefings
- Stakeholder focus groups

In order to ensure that protected characteristic groups were represented during public consultation, it was important to ensure the accessibility of locations used, both in terms of physical access, but also geographical access in what is a predominantly rural area.

Seldom Heard groups

The term 'seldom-heard groups' refers to under-represented people who use or might potentially use health or social services and who are less likely to be heard by these service professionals and decision-makers. These groups used to be described as hard to reach – suggesting that there is something that prevents their engagement with services. Seldom heard emphasises the responsibility of agencies to reach out to excluded people, ensuring that they have access to health and social care services and that their voices can be heard, and is preferred for those reasons.



As stated above, the stakeholder and EqIA teams worked with the local authorities to identify a range of Seldom Heard Groups and individuals, including representatives of local Seldom Heard Groups to ensure that we consulted with as many people as possible who could be affected by our proposals. These people were identified as being unlikely to participate in or respond to traditional consultation techniques. They may find it harder to get involved in consultation and need additional support to access materials. Examples include Gypsy and Traveller communities, the ageing population, the younger population, the disabled and tourists. A list of those groups representing those with protected characteristics that were actively engaged with during the consultation period in 2021, is provided in Table 8 below.

Table 8: Groups representing those with protected characteristics actively engaged with during the consultation period in 2021

Category	Group
People with disabilities	DCC Disability Partnership (extensive membership)
	Eden Access Forum
Young People	Durham Youth Council (up to 19yrs)
	Teesdale AAP young people's forum/young people's groups via AAP co-ordinator for Teesdale
	Durham Students Union
	Durham Works (16+)
	Investing in Children (ages up to 21yrs)
	Cumbria 24
	Eden Youth Hub
	Eden Youth Council
	Inspira
Isolated, elderly or vulnerable people	Age UK
	Association of Teesdale Day Clubs
Ethnic minorities	Traveller Times

To encourage these groups to get involved in the consultation, materials were prepared to be accessible and clear. Our consultation also included measures to ensure we communicated effectively with these groups and provided an opportunity for them to have their say. Some of our methods included but were not limited to:

- Utilising a range of awareness-raising methods such as newspapers, social media, posters and flyers.
- Using posters and leaflets publicity at community facilities and hubs that Seldom Heard Groups may frequent. For example, we shared posters and flyers with several tourist centres such as Appleby Tourist Information Centre, Penrith Tourist Information Centre and Center Parcs.
- We contacted key community group representatives for them to share information about the consultation with their wider network.



- We ensured that our phone number and email address were available on materials for those who had questions or found it difficult to submit comments.
- Accessible versions of consultation materials could be requested on 0333 090 1192
- We selected venues and sought to set the timing of events with a view to their accessibility and Covid safe protocols.

Consultation responses, 2021, relating to equalities issues

A review has been undertaken of the responses from the 2021 statutory consultation, and a summary of the key issues in relation to equality impacts, divided by protected characteristics, is provided below. This has been divided into the key issues raised by the local authorities along the Project and those raised by the general public.

Local Authorities

The five Local Authorities within the study area of the proposed Project, Cumbria County Council, Eden District Council, County Durham, North Yorkshire County Council, and Richmondshire District Council, all provided written consultation responses to the proposed Project.

Table 9: Local authority responses relevant to equalities

Protected Characteristic	Comments
Age	Some Local Authority responses included reference to the impact of the proposed route on the young and elderly. A common comment was that of the negative impact of construction and operation of the route on noise quality and air quality for both young and elderly people in the community. For the young, the proximity of the proposed route to Kirkby Thore primary school and possible air quality issues for the children at the school was specifically mentioned. Additionally, comments were raised regarding the need for opportunities for young people to access training, skills and jobs through the Project.
Disability	Similar comments were raised to that of age relating to the negative impact of construction and operation of the route on noise quality and air quality for disabled people.
Race	A comment was raised by Eden District Council relating to the Gypsy and Traveller community and the annual Appleby Horse Fair and Brough Hill Fair. Specifically, the comment noted the need for provision of a continuous eastwest route for non-motorised transport connectivity as the dualling of the A66 is modelled to increased traffic along the route, which will make the route less desirable and safe for non-motorised users travelling to and from the annual Appleby Horse Fair and Brough Hill Fair.
Others	In addition to comments directly relevant to protected characteristic groups, numerous comments were made relating to accessibility for other non-motorised users. Comments referenced the need for more east-west off road routes to be considered for dedication as Public Rights of Way (PRoWs), enhancing active travel links and ensuring walking, cycling and horse-riding routes and crossing points are fully considered.



General Public

In total, 960 responses were received from the consultee category 'Section 47 general public, local communities and other stakeholders', which formed the majority of consultation responses.

Table 10: General public responses relevant to equalities

able 10: General public	responses relevant to equalities
Protected	Comments
Characteristic	
Age	Numerous comments were raised by the public relating to the impact of the proposed route on the young and elderly. A recurring comment was that of the negative impact of construction and operation of the route on noise quality, air quality and visual impact for both young and elderly people in the community. For the young, comments were also raised in relation to the proximity of the road to schools and the impact of this on the air quality, with particular reference made to Kirkby Thore primary school. Additionally, comments related to the pedestrian safety of young people along pavements, particularly for children walking to school and the impact of increased traffic. Comments were also raised regarding the need for opportunities for young people to access training, skills and jobs through the Project, as well as the need for enhancements to the wider cycle, footpath and bridleway network to benefit young people. For the elderly, comments were raised in relation to possible interpretation and navigation difficulties of the new road layout for elderly drivers, the need for safety in design for elderly drivers such as more laybys, and pedestrian safety of the elderly when crossing the proposed route and adjaining in petions.
	safety of the elderly when crossing the proposed route and adjoining junctions (particularly between Stephen Bank to Carkin Moor).
Disability	Similar to age, comments were raised in relation to the negative impact of construction and operation of the route on noise quality, air quality and visual impact for disabled people in the community. Comments were also made relating to current accessibility issues for disabled people due to narrow pavements and the associated road safety issues this brings.
	Additionally, for disabled people driving along the proposed route, comments were raised around the need for suitable layovers and laybys.
Race	Comments were made regarding the Gypsy and Traveller community in the area and wider community cultural gatherings held annually at Appleby Horse Fair and Brough Hill Fair. Appleby Horse Fair comments referred to the possible negative impact of the proposed route on the Gypsy and Traveller community attending the Fair. Additionally, strong safety and congestion concerns were raised regarding horse drawn carriages arriving at Appleby Horse Fair along the A66 and the junctions, with the public suggesting that a safer local network route should be provided. Comments were also raised relating to facilities for the Gypsy and Traveller community including the need for dedicated facilities for those attending the event and more stop over points and grazing land along the A66 route for those travelling to the event. A number of comments were raised in relation to Brough Hill Fair. Comments
	raised particular concern with regard to the impact of the proposed route on the Fair, noting the event's medieval origin and cultural significance to the



	Gypsy and Traveller community. Other comments suggested that the proposed route be amended so that Brough Hill Fair site need not be relocated whilst other comments commended the proposal for the site being moved to a site with better access and facilities.
Other	In addition to comments directly relevant to protected characteristic groups, numerous comments were made relating to accessibility for non-motorised users. In particular, for walking, cycling and horse-riders it was noted that there are not enough proposed dedicated routes for non-motorised users across and adjacent to the Project area and that some existing PRoWs were severed by the proposals. Additionally, it was noted that crossing points over the A66 were limited, local connectivity between villages severed and pavements along the route currently being too narrow.

Engagement with the Local Authorities 2022

Further consultation, in regard to the EqIA, was undertaken with the Local Authorities in early 2022, through a series of meetings.

- 13 January Cumbria County Council and Eden District Council
- 14 January Durham County Council
- 22 January North Yorkshire County Council and Richmondshire District Council

The Local Authorities were provided with information on the proposed approach and methodology; a summary of the equality groups identified in the study area; and a high-level summary of the key issues identified. The local authorities were asked for feedback and verbally agreed that they were content with the proposed approach.

Engagement with Happy Hooves 2022

Following Statutory consultation in Autumn 2021, the location of the proposed construction compounds was moved. As a result, supplementary consultation was undertaken between Wednesday 16 February to 20 March 2022, to seek views of individuals on the proposed location of the revised compounds. The owner of the Happy Hooves Riding Stables was contacted as part of this consultation.

Throughout early 2022, the Project team has been engaging directly with the business owner and land agent for Happy Hooves Riding Stables at Penrith in relation to potential impacts on the businesses and activities operating there as a result of the location of a construction compound in the locality in which this business operates. This engagement has identified the nature of the activities taking place at this business, and in terms of the equality impact assessment, the equalities groups potentially disproportionately or differentially affected by any impacts in relation to the construction or operational phases of the Project.

Discussions with the owners of the Happy Hooves Riding Stables will be ongoing through the next phases of the project, in particular during the detailed design stage, to explore how any impacts may be mitigated.



Brough Hill Fair Supplementary Consultation 2022

Supplementary consultation was undertaken on a suitable replacement site for the Brough Hill Fair between 18th March to 3rd of April. Two alternative sites were consulted on:

- The Central Site this site lies to the immediate west of the existing site and is currently used by the MoD as a 'bivvy' or camping site and training area.
- Proposed alternative eastern site This site is to the south of the A66, approximately 1.6 miles east from the current site.

Further detail on these two sites is provided in Section 2.9 below.

A review has been undertaken of the responses to this consultation. A summary of the issues raised is provided in the Consultation Report (Application Document 4.4, Chapter 7). This feedback has informed the choice of replacement site taken forward.

2.8 Screening evidence conclusions

The equalities baseline, alongside the evidence gathered from ongoing engagement and consultation has been used to inform the conclusion as to whether further assessment of potential equality impacts should be undertaken.

The equalities baseline identified that the study area is characterised by a larger than average elderly population. This sector of the population may be more vulnerable to the negative effects of construction impacts including noise, dust, and visual impacts. This could be the result of a number of factors including being likely to be around the home more in the daytime and more likely to have a long-term health problem. Clusters of elderly persons, such as at the Winters Park Care Home on the eastern edge of Penrith may be particularly susceptible to the adverse effects of construction impacts. Particularly those with dementia that can worsen the effects of sensory changes. The elderly may also be more vulnerable to any increase in HGV movements on local roads, being more likely to have both sensory and mobility impairments that affect the ease with which they are able to cross the road.

The young may also be more susceptible to the adverse effects of construction impacts; particularly any increase in HGV movements on local roads. The route passes close to a number of primary schools. Children, in particular younger children, are generally considered to be more sensitive than adults to the potential effects of noise on their concentration and ability to learn, with implications for educational attainment. Noise during construction and when the Proposed Project is operational therefore has the potential to differentially and disproportionately affect children engaging in indoor or outdoor learning at any affected schools. Children are also more likely to be involved in road traffic accidents for a number of reasons, including lower perceptual abilities affecting their ability to judge speed of vehicles, greater likelihood of distraction and their small size meaning they are more likely to sustain serious injury. As a result, any increase in vehicle movements may increase the risks to road safety.

The baseline identified a number of churches and religious centres within the study area. Construction or operational noise affecting places of worship has the potential to result in disproportionate or differential effects on those using these facilities for more noise



sensitive activities such as worship, quiet prayer or contemplation, or for social and cultural uses.

The proposals may impact on bus services in this predominantly rural area. This may include negative effects during construction as a result of route diversions, congestion, and delays. But it could also result in positive effects at the operational phase as a result of improvements in journey times along the A66. Those groups with lower levels of access to private vehicles, which is more likely to include, the young, the elderly, and those from more socio-economically deprived backgrounds are likely to be disproportionately affected.

A number of receptors in the area cater for the needs of those with disabilities, including the Happy Hooves stables which provides Riding for the Disabled Association facilities (RDA) and the former Llama Karma café which previously provided animal assisted therapy for disabled children and adults. The loss of, or impact on, these facilities or changes to the services that they provide may disproportionately impact on those with disabilities, if there are no suitable alternative venues in the local area.

Although the baseline identifies that the resident population in the area has low levels of racial diversity, along the Project there are several locations that are of cultural importance for the Gypsy and Traveller community, and host significant numbers of this protected characteristic group at certain times of the year. These locations include the site of Appleby Horse Fair at Appleby-in-Westmorland and the Brough Hill Fair site near Warcop. It will be important to ensure that the proposed works and construction activities do not disproportionately or differentially negatively impact on this community and their cultural activities in the area. Liaison with the *Shera Rom* (or Head Gypsy) has been ongoing throughout the development of route options.

Having considered the likely impacts of the project, it is considered unlikely that sexual orientation, gender reassignment (Inc. transgender) or marriage/civil partnership are likely to be disproportionately of differentially affected by the Project.

As a result of the above screening outcome, it is concluded that further evidence is required to understand the potential effects of the Project on equality groups. Therefore, a full EqIA has been undertaken at the preliminary design stage and is set out in Section D of this report.

Confirmation – State whether a full equality impact assessment is required (Tick box as appropriate)									
Yes	` ' ' '								
	√	practice and to remove barriers to equality of opportunity. • Further evidence/consultation required to enable a sound equality decision. Proceed to Sections D – H							
No		The policy/practice is robust in terms of equality.							



 The impact on different groups is considered to be 'neutral' with no risk of discrimination and any minor impacts can be justified.

Proceed to Section E1 and Sign-off at H

D: ASSESSMENT (Stage 2)

The level of impact on protected characteristics gauged from available information, research, consultation

2.9 Assessment of potential impact on equalities groups

Overview

This section sets out the potential impacts of the proposed Project on protected characteristic groups during construction and operation. The assessment of potential equalities effects is based on assessment outputs from the following ES chapters for the proposed Project (as found in Application Document 3.2 Environmental Statement Volume 1 (Main Report)):

- Air Quality (Chapter 5)
- Noise and Vibration (Chapter 12)
- Population and Human health (Chapter 13)

The outcomes from the following Application Documents have also been reviewed to aid in the identification of any further impacts on protected characteristic groups:

- 2.4 Walking, Cycling and Horse-Riding (WCH) Proposals report
- 2.7 Environmental Management Plan (EMP)
- 2.8 Environmental Mitigation Maps
- 2.9 Environmental Mitigation Schedule
- 3.07 Transport Assessment

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 are 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; or
- 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.

The assessment identifies embedded mitigation for the proposed Project that assists with minimising potential equality effects. Any additional mitigation or activities to address any potential negative effects or risks, or to deliver positive effects is provided in Table 11.

Potential construction effects

Noise impacts

The proposed Project is likely to result in temporary adverse noise effects as a result of construction activities for equalities receptors within close proximity to the proposed works. Although most of these impacts are assessed, in the Noise and Vibration assessment (Application Document 3.2 Environmental Statement Volume 1 (Main Report), Chapter 12 Noise and Vibration), to result in noise impacts below the Lowest Observed Adverse Effect Level (LOAEL), some receptors may experience noise impacts between the LOAEL and the Significant Observed Adverse Effect Level (SOAEL), and a small number may experience noise impacts in exceedance of the SOAEL. There is the potential for differential noise effects on a number of protected characteristic groups. Children, in particular younger children, are generally considered to be more sensitive than adults to the potential effects of noise on their concentration and ability to learn, with implications for educational attainment. Noise during construction therefore has the potential to differentially and disproportionately affect children engaging in indoor or outdoor learning at any affected schools in close proximity to construction areas. The elderly are also more vulnerable to the negative effects of noise. This could be the result of a number of factors including being likely to be around the home more in the daytime and more likely to have a long-term health problem.

Places of worship, such as churches and faith centres are also likely to experience differential effects of any noise impacts, often being used for more noise sensitive activities such as worship, quiet prayer or contemplation, or for social and cultural uses, however services generally fall on a Sunday, outside of the projects core working hours and are therefore unlikely to be affected.

Noise impacts should be reduced to acceptable levels through measures outlined in the EMP, but some residual differential or disproportionate effects may remain for those receptors that are more sensitive to changes in the noise environment including schools, children's nurseries and faith centres in close proximity to the route.

Impacts on the Llama Karma Café

The Llama Karma Café at Brougham previously provided animal assisted therapy for disabled and disadvantaged adults and children. This venue has been closed since autumn 2021, having been purchased by agreement with the owners following early consultation with National Highways. Consultation with the owners has confirmed that the majority of previous customers and clients are now served by an alternative mobile animal therapy service that operates from the Penrith area. It is therefore considered that there will not be any differential or disproportionate effects on those with disabilities as a result of the closure of this facility. The buildings that the business operated from have been



repurposed as a National Highways Project Hub for the A66 and now provide a point for information and ongoing engagement and consultation within the heart of the community.

Impacts on Happy Hooves Riding Centre

The population and health assessment has identified that the Project will require land that is currently used by the Happy Hooves Riding Centre at Penrith. This land is currently identified as being required for a construction compound for the M6 Junction 40 to Kemplay Bank works and for landscape integration works. During the construction of the Project, it has been assessed in the Population and Health assessment (Application Document 3.2 Environmental Statement Volume 1 (Main Report), Chapter 13 Population and Human health) that there will be a permanent very large adverse impact on the Happy Hooves Riding Centre due to the associated noise, disruption, visual impact and loss of land that may impact on the operational activities of the Happy Hooves stables and its associated business. As outlined above, the centre currently provides 'Riding for the Disabled' and 'Changing Lives' services and as a result, construction impacts could result in a disproportionate or differential effect on those with disabilities and young people who may not be able to access alternative resources or riding facilities in the local area due to lack of provision or difficulties with physical access. According to the RDA website the next nearest RDA facility is only 20 minutes-drive to the west of Penrith at Troutbeck although it is not clear at this stage what capacity, if any, this facility has.

Construction measures to control dust and noise during construction as described in Annex B4 and B5, respectively, within the EMP (Application Document 2.7) will seek to reduce impacts related to noise and air quality. National Highways is engaging with the business to explore the extent to which it can facilitate its relocation should the business be minded to do so. Table 11 provides detail on further measures being undertaken to address any potential negative effects on the existing operational activities and services at Happy Hooves.

Kirkby Thore school

Kirkby Thore Primary School, at Kirkby Thore, provides education for children aged 4-11. During construction, a portion of the Kirkby Thore Primary School sports pitch will be required to facilitate works to an existing overhead cable. The detailed design for these diversion works is not yet completed, so the exact nature and duration of the works cannot currently be confirmed but it is currently anticipated that the works would require the existing overhead electricity line to be increased in height as it crosses the playing field due to the realignment and raising of a local road to pass over the new A66.

The land take equates to approximately 0.15ha which is approximately 35% of the outdoor space available to the school. No alternative provisions will be provided during construction of the utility diversion. Works will be planned to be outwith the school opening hours. The playing field will be reinstated to its existing condition upon completion of the works. The replacement lines will be higher than the current provision, thus increasing the vertical clearance above the school playing field.

The Land Plans (Application Document 5.13) show the land in pink denoting that National Highways seek a power to acquire the land. The Statement of Reasons (Application Document 5.8) explains that the permanent acquisition power is sought in relation to land



over which it will be necessary for National Highways to grant rights to third parties, such as to statutory undertakers to allow them to construct, operate and maintain utilities apparatus diverted by the Project. National Highways would hope that the affected landowners would be prepared to grant the required rights to statutory undertakers without it being necessary for National Highways to acquire the land, grant the necessary rights and offer the land back to its former owners. Irrespective of the position in relation to the ownership of the land (whether it is owned by its current owner or National Highways for a short period), once the diversion works are completed the land would revert to its current use. Consequently, it is considered that the effects of the diversionary works to the school would be temporary in nature.

The population assessment has identified this as a temporary large significant effect on this community asset. The health assessment has also assessed that there will be a temporary negative effect on health as a result of a temporary reduction in opportunities for children to take part in sport and outdoor exercise.

In addition, construction is anticipated to lead to temporary indirect minor adverse impacts including dust, noise and vibration and landscape impacts on Kirkby Thore School. The presence of Kirkby Thore Primary School means that a large number of children are present in the study area. Children are particularly vulnerable as effects can have lasting impacts on longer term health.

It is therefore considered that there will be a temporary disproportionate effect on young people during construction as a result of temporary land use at Kirkby Thore School. Construction measures to control dust and noise during construction as described in Annex B4 and B5, respectively, within the EMP (Application Document 2.7) will reduce impacts related to noise and air quality.

Impacts on routes used by Walkers, Cyclists and Horse-Riders

The proposed Project is likely to result in temporary impacts on a number of routes used by walkers, cyclists and horse-riders (WCHs) potentially resulting in changes to journey times and travel patterns, loss of routes, temporary closures and diversions, changes to noise and visual environment, and changes to crossing points and safety aspect. The full detail of impacts on routes for WCH's is provided in Chapter 13 Population and Human Health. The majority of the routes are rural routes generally used for recreational walking, and therefore differential or disproportionate effects on equalities groups are likely to be more limited. Annex B6 of the EMP (Application Document 2.7) provides a Public Rights of Way Management Plan. The Plan details the proposed diversions and new routes to be put in place before and during construction, which seek to mitigate impacts on the PRoW network. It also sets out a hierarchy of mitigation to help maintain access across the PRoW network during construction, for example using appropriate signage, diversions and/or public liaison where necessary. The preparation and delivery of the detailed Public Rights of Way Management Plan will involve the local community through the appointed Public Liaison Officer (or similar) to ensure their needs are met.



Impacts on bus services

The A66 is utilised by public transport and there are multiple bus stops along the highway. The Transport Assessment (Application Document . 7 Transport Assessment) provides a summary of bus routes and stops within the vicinity of the Project.

The construction of the proposed Project is likely to impact on both general service bus routes and school bus services. This may include effects during construction as a result of the temporary relocation of bus stops, route diversions, and delays caused by temporary traffic management controls and congestion.

It is likely that without mitigation it may disproportionately affect non-car users which are more likely to be those with disabilities, mobility issues, the young, the elderly and those from socio-economically deprived backgrounds.

Any potential impacts will be managed through measures set out in the Construction Traffic Management Plan will (see Annex B14 of the EMP, Application Document 2.7). The temporary relocation of bus stops will be discussed with the Local Planning Authorities and public transport operators before the commencement of the construction phase to make sure that these are suitably relocated in terms of access. Temporary traffic management arrangements for construction and maintenance roadworks will be designed to achieve the following:

- Sufficient capacity to accommodate traffic demands.
- Journey times that do not increase significantly from existing conditions.
- Minimal duration, length and frequency of temporary traffic management phases, carriageway closures and diversions.
- Advanced warning of roadworks in the calendar and on the road network, to allow drivers to re-route and to minimise traffic disruption.

With mitigation in place any disproportionate or differential effects on equalities groups should be limited.

Dust and air quality impacts from construction traffic and activities

Overall, the Project is considered to have a large construction dust risk potential. It has the potential to affect receptors during the construction phase, and the potential to differentially or disproportionately impact on the young and old; with children and the elderly being more susceptible to the health impacts of poor air quality. Mitigation measures will be required to reduce the frequency and intensity of potential dust impacts.

Mitigation to reduce construction dust impacts to a negligible level will be included in the Air Quality and Dust Management Plan (see Annex B4 of the EMP, Application Document 2.7). This includes development of a dust management plan with measures to monitor effectiveness of mitigation, daily on-site and off-site inspections and keeping a record of complaints and exceptional dust events. Suitable haul routes will be identified to mitigate impacts of moving any material required for construction or needing to be removed after excavation on stakeholders and the environment.

Due to the nature of the Project, large quantities of material will be required during construction and therefore transportation of these materials will be necessary on the local road network and designated haul routes. There is the potential that the movement of



construction-related vehicles may cause a deterioration in air quality along transport routes for human receptors, however, the Air Quality Assessment (Application Document 3.2 Environmental Statement Volume 1 (Main Report)), Chapter 5 Air Quality) concludes that there are 'no likely significant adverse effects anticipated in relation to human health'.

With appropriate best practice mitigation measures in place the potential impacts from construction activities and construction traffic movements are considered to be not significant and there should be no disproportionate or differential effects on equalities groups.

Increased HGV movements

There is the potential for impacts on mental wellbeing due to a perceived reduction in the quality of the living environment and concerns about air quality and road safety. This is likely to disproportionately affect the young, elderly and those with disabilities including mobility, hearing, or sight issues who are more sensitive to changes in the living environment or more at risk of road traffic accidents. Measures to manage the movement of construction vehicles, including routing HGVs away from sensitive receptors such as schools, will be outlined in the Construction Traffic Management Plan (see Annex B14 of the EMP, Application Document 2.7). Appropriate measures in the CTMP should remove any differential of disproportionate effects.

Layby closures

Layby closures and restrictions during construction and operation have the potential to impact on disabled travellers, gender/pregnancy, and age adversely and differentially as a result of decreased space and or uncertainty over location due to removal or temporary or permanent relocation. Impacts are likely to be temporary during construction and would be mitigated through appropriate signage and provision to be outlined in the Traffic Management Plan. At operation a replacement layby will be provided on the eastbound carriageway between the M6 Junction 40 and Kemplay Bank Roundabout. The existing layby on the westbound carriageway between Kemplay Bank Roundabout and M6 Junction 40 will be removed and will not be replaced. At Stephen Bank to Carkin moor, new "Type A" layby facilities (which incorporates a segregation island) will be provided on the proposed mainline in both eastbound and westbound directions to replace existing provision which is lost due to the implementation of the Project. With upgraded layby provision provided, there are unlikely to be any disproportionate or differential effects on equality groups.

Impacts on the Gypsy and Traveller community

Following feedback on the proposals presented at Statutory Consultation in 2021, the proposed Project has been re-designed to avoid direct impacts on the Fair Hill site at Appleby-in-Westmorland which is currently used by the Gypsy and Traveller community for the Appleby Horse Fair. As a result, the design proposals no longer directly impact on access to, or loss of land from this site.

Construction activities along the route of the A66, and particularly in the area of Appleby-in-Westmorland have the potential to impact on journeys to and from Appleby Horse Fair as a result of diversions, congestion, and delays. The Appleby Horse Fair and the Appleby Horse Fair Multi-Agency Strategic Coordinating Group (MASCG) will be liaised with



around the timing of works, adequate diversions, and routing of Fair traffic away from the A66 to minimise impacts on journeys to and from the Fair. This principle is set out in the EMP and will be incorporated into Construction Traffic Management Plans.

There will be a direct loss of the Brough Hill Fair site which will be required for construction of the proposed Project (Scheme 6 - Appleby to Brough (Warcop)).

Two alternative sites were identified as possible replacement sites for the Brough Hill Fair site.

- The Central Site this site lies to the immediate west of the existing site and is currently used by the MoD as a 'bivvy' or camping site and training area. The access to the site is from Station Road which provides safer access and egress than the current site which is currently accessed by a small turning off the A66. The consultation feedback explained that the proposed MoD site has challenging land levels, is close to other residential properties and near to the A66. As a result of former land uses on this site, it may also require further work.
- The proposed alternative eastern site This site is to the south of the A66, approximately 1.6 miles east from the current site. This site has an access from Musgrave Lane which would allow access for horses and horse-drawn vehicles. It would also allow users of the site to park their caravans further from the road. This site is smaller than the alternative central site.

Supplementary consultation was undertaken on these two sites between 18th March to 3rd of April 2022. Representatives of the Gypsy and Traveller population were engaged with directly during this consultation process and although they had reservations about both sites it is anticipated that these could be managed with appropriate mitigation and management measures.

Following consultation, it has been concluded that the Central Site is the preferred replacement site for the Brough Hill Fair site. The site may include additional works to make it suitable for its intended use. The details of this will be confirmed at detailed design but could possibly include re-profiling and remediation of the land and screening planting along the boundaries.

Employment Opportunities

A Skills and Employment Strategy has been prepared (Annex B12 of the EMP, Application Document 2.7) in consultation with the Local Planning Authorities to outline how the Project will support training and upskilling of the local workforce to maximise employment opportunities across a wide range of roles in the construction phase. This includes measures to ensure a diverse workforce and promote opportunities to people who are currently unemployed and/or with a low level of qualifications.

The strategy outlines how the Project will work with local schools and colleges to ensure relevant training is available to local people, to utilise them on the Project and develop their skills and qualifications, including through work experience, apprenticeships, on-job and on-site training. At the same time, wider government objectives relating to increasing student interest in Science Technology Engineering and Maths (STEM) subjects to raise awareness of careers in scientific and engineering-based fields (which will include civil



engineering and construction), will be met through our Education Plan which will target engagement with local schools.

The strategy also sets out how the Project will seek to employ a more diverse workforce through engagement with key stakeholders including those representing people with disabilities and the long-term unemployed.

Operational effects

Impacts on Walkers, Cyclists and Horse-Riders (WCHs) using Public Rights of Ways (PRoWs)

It is anticipated that the proposed Project could result in both positive improvements and adverse effects to walking, cycling and horse-riding routes as a result of changes to the standards of existing routes, changes to journey times, potential loss of routes, changes to the noise and visual environment, and changes to crossing points and safety aspects. The full detail of impacts on population and health in relation to the Project's effects on WCH is provided in the Environmental Statement, Chapter 13 Population and Human Health.

In the urban areas such as at the M6 J40, Kemplay Bank roundabout and the A1(M) Scotch Corner junction, the new road layouts will include controlled crossing facilities for pedestrians. The toucan crossings will have tactile paving and tactile cones for partially sighted users. Gradients will be such that wheelchair users can use crossings and the paths at those junctions. However, in the rural areas, it is likely that the paths will not cater directly for wheelchair or partially sighted users and will be more in keeping with the existing public rights of way network.

Across the Project, the pedestrian, cyclist and horse-rider facilities that are severed by the dualling works will be reconnected via grade-separated crossings resulting in safer crossings of the A66. This will be particularly beneficial for the elderly who are more at risk of being involved in road traffic incidents due to sensory and mobility impairments that affect the ease with which they are able to cross the road; and the young who are more likely to be involved in road traffic accidents for a number of reasons, including lower perceptual abilities affecting their ability to judge speed of vehicles, greater likelihood of distraction and their small size meaning they are more likely to sustain serious injury. However, this may potentially increase the length of some routes which may have negative impacts for those with mobility impairments, the young and pregnancy and maternity. These crossings will occur either at grade-separated junctions, or at standalone bridges and underpasses. Some accommodation underpasses may be used as shared-use facilities for walkers, cyclists or horse-riders as required. Equality considerations such as the gradient of slopes down to underpasses, step free access to overbridges, paving finishes to ensure accessibility for wheelchair users or those with mobility issues will be considered at detailed design.

Improved road safety

The proposed Project will result in a reduction in road traffic accidents and casualties for motorised users travelling along the A66, and accessing/egressing from villages along the route, with anticipated positive effects for all PCG's. This reduction will result from the following measures:



- Upgrading of the road to dual carriageways, which is expected to reduce the number of collisions.
- Closure of gaps in the central reservation and the provision of grade separated junctions.
- At-grade junctions have been designed as left in, left out only where grade separation or all movements have not been required.
- Closure of the gaps in the central reservation has been designed to prevent those hazards relating to vehicles drifting onto the opposite carriage and removes the need for right turn manoeuvres across oncoming traffic.
- Dualling of the single carriageway sections has been designed to prevent overtaking manoeuvres occurring in the opposite carriageway
- All severed public rights of way, plus those terminating at the new dualled sections of the A66, have been re-routed to the nearest grade-separated crossing facility. This has been provided at either a new grade-separated junction, accommodation underpass, or designated WCH bridge or underpass.

The above improvements in safety will result in a reduction of risk or the likelihood of that hazard occurring post Project opening for all schemes (except Scheme 11 A1(M) Junction 53 (Scotch Corner).

Assessment of project impacts on accidents as detailed in the Transport Assessment (Application Document 3.07) concludes that the A66 improvements will not only reduce the number of accidents on the A66 itself, but also on the surrounding road network as a result of the increased flow on the A66, thereby removing traffic from other rural links.

Reduced severance

In certain villages, where the proposed route will now bypass the village, such as at Kirkby Thore and Crackenthorpe, this is likely to result in reduced severance and improved road safety for local residents. This is likely to be disproportionately beneficial to the young and the elderly who are generally at greater risk of road safety accidents.

Noise impacts

During operation the new route is predicted to generally not result in significant noise impacts on schools in proximity to the route. Kirkby Thore School is predicted to experience significant beneficial effects as a result of the Project. This is due to the existing road network being by-passed, in particular, Priest Lane and the effect of embedded mitigation. As a result, traffic noise levels at Kirkby Thore Primary School would be lower with the Project. The only school predicted to experience any adverse impacts is Bowes Hutchinson C of E school, which is predicted to experience a minor adverse noise impact in the short term, but this would reduce in the long term.

Minor adverse noise impacts in the short term are predicted on Stoller House as a result of changes in traffic flows on the A66 which runs close by to the north of the building. The Sunbeams Music Trust operates out of Stoller House, providing Community Music to children and adults with a wide range of disabilities and complex medical needs including physical disabilities and mental health problems, Alzheimer's and senile dementia, cerebral palsy, autism, Down's Syndrome, sensory impairments, emotional and behavioural disturbance and profound multiple disabilities. Due to their complex needs, certain users, such as those on the autistic spectrum, can be very sensitive to change,



particularly in the sensory environment (noise, visual etc), and experience differential or disproportionate effects as a result. Such changes in the noise environment though are predicted to be short term and reduce to negligible in the long-term.

Noise impacts on the Winter Park Care Home are predicted to be negligible due to adequate screening from buildings and vegetation between it and the A66.

During operation, noise impacts on churches and religious centres are predicted to be 'not significant' or 'beneficial'. The new by-pass section at Kirkby Thore is predicted to result in beneficial effects for churches and places of worship in Kirkby Thore. Similarly, beneficial impacts on noise are also predicted for St Mary's Church in Rokeby.

2.10 Summary of impacts by equality group

The effects of the above identified impacts have been summarised in the table below for each of the equality groups.

Equality Group (Protected Characteristics)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis
Sex			✓	
Religion or Belief		✓		Construction Potential for some effects on services at churches and religious centres in close proximity to construction areas, however services generally fall on a Sunday, outside of the projects core working hours, and are therefore unlikely to be affected.
Age				Construction Disproportionate impacts during construction on young people (schools), and the elderly (care home/retirement villages), resulting from noise and dust impacts, impacts on public transport and road safety resulting from HGV movements. These would be mitigated through appropriate measures in the EMP and particularly the Construction Traffic Management Plans. Temporary adverse and disproportionate impact on young people as a result of the temporary use of 35% of the outdoor space available to Kirkby Thore Primary School to facilitate works to an existing overhead cable.



Potential adverse and differential impacts on disabled travellers, gender/pregnancy, and age as a result of decreased space and or uncertainty over location of laybys due to access issues or removal or temporary relocation during construction.

Potential new job opportunities, with employment measures aimed at ensuring a diverse and inclusive workforce and promoting opportunities to local people. The Skills and Employment strategy (Annex B12 of the EMP, document reference 2.7) outlines how the Project will work with local schools and colleges to ensure relevant training is available to local people, to utilise them on the Project and develop their skills and qualifications. It also outlines how wider government objectives relating to increasing student interest in Science Technology Engineering and Maths (STEM) subjects to raise awareness of careers in scientific and engineering-based fields (which will include civil engineering and construction), will be met through the Projects Education Plan which will target engagement with local schools.

Potential for disproportionate adverse impacts on the young from the loss of the 'Changing Lives' services at Happy Hooves Riding Stables, resulting from noise, disruption, visual impacts and loss of land during construction, that may impact on the operational activities of the Happy Hooves stables and its associated business.

Operation

Potential positive impacts from reduced severance for a number of locations along the route and improved road safety including safer crossing points across the A66 which would be particularly beneficial for the young and the elderly.

Potential positive impacts from improved public transport journey times.

Potential short term negative impacts on the young as a result of increased



		operational noise impacts in close proximity to Bowes Hutchinson CofE school, although this would reduce in the long-term. Positive effects on young people at Kirkby Thore School with noise levels with the project assessed as being lower.
Disability		Construction Impacts on those with disabilities as a result of disproportionate or differential effects on the Riding for the Disabled Association (RDA) group and facilities at Happy Hooves Riding Stables. This results from permanent very large adverse effects during construction related to construction activities and compounds potentially impacting on the continued operation of the Happy Hooves stables and its associated business and functions. Layby closures, and relocations may disproportionately impact on those with disabilities. Potential for disproportionate impacts on those with disabilities and poor mobility from temporary changes to walking routes and public transport routes. During construction those impacts are likely to be negative as a result of disruption and diversion to existing routes. Operation Potential for beneficial impacts on those with disabilities and poor mobility from improved walking routes with safer crossings of the A66 and from improved public transport journeys. Potential short term negative noise impacts for those with disabilities and long-term health conditions accessing music therapy services at Stoller House although these will reduce to negligible in the long-term.
Race	√	Construction



				Potential negative impacts on journeys to and from Appleby Horse Fair during construction. Direct loss of the current Brough Hill Fair site. The loss of which will be mitigated with a replacement site to the immediate west. Operation Potential positive impacts on the gypsy and traveller population as result of the relocation of the Brough Hill Fair site. The proposed replacement site will provide greater separation from the A66, as well as safer access, being accessed from local roads rather than directly from the A66.
Sexual Orientation				None identified
Gender Reassignment (Incl. Transsexual and Transgender)				None identified
Pregnancy & Maternity				Construction The potential for layby disruption along sections of the Project could pose a risk for accessibility or emergency needs. An increase in the length of some PRoWs and walking routes may have negative impacts for pregnancy and maternity.
Marriage & Civil Partnership				None identified
Potential Risks Identified – Including insufficient information to make robust decisions (Yes/No ticked as appropriate)				
No				
shown in Section F)		differential or d	during construction - potential disproportionate effects on equality ding young (schools and nursery's) the	



elderly (care home/retirement villages), and religious groups (churches and religious centres)

Adverse impacts on the Riding for the Disabled facilities at Happy Hooves with lack of certainty over the availability of alternative facilities.

Potential impacts during construction on journeys to and from Appleby Fair. Potential conflicts between the gypsy and traveller population and other road users during these times.

Temporary adverse impact on Kirkby Thore Primary School as a result of temporary land use required to facilitate works to an existing overhead cable, affecting outdoor space.

Potential conflicts between construction vehicle haul routes passing by equalities receptors such as schools, with associated noise, and road safety risks. Insufficient information currently available to evaluate fully.

Ongoing risks around Brough Hill Fair and agreeing a replacement site that the Gypsy and Traveller population and the local resident population will find acceptable

Insufficient information on impacts on emergency service vehicles during construction to evaluate fully.

Operation

No specific risks identified

E: Options: The rationale behind the decision reached.

E1: Proceed with the policy/practice because:

- the decision can be justified (At screening or in Section D)
- there is no reasonable alternative
- the Senior Reporting Officer/Programme Delivery
 Director is content to defend any potential challenge and is willing to sign-off in Section H



(There are no unjustified negative impacts, and the policy/practice is compliant in terms of the equality of E2: Make adjustments	uty)
o to demonstrate how activities will lead to a full (Ensure further evidence is gathered to ensure any barrier removed and referenced in Sections F and G)	
(Opportunities were identified to advance equality, for relations, and prevent discrimination)	ster good made to the Project to address identified risks.
E3: Withdraw it because there is obvious detriment	
(Sign Off in Section H)	
(A negative impact has been identified that cannot be	justified)

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

2.11 Desk-based research and demographic analysis

Desk-based research was undertaken to explore the relevant aspects of the Project 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.

2.12 The EDIT Tool

The Equality, Diversity and Inclusion Tool (EDIT) is designed to enable National Highways 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 EDIT guides the user through a series of questions designed to enable them to make an informed decision about how EDI are relevant to the Project. The EDIT uses



information about the Project, local population data, equality research and any other relevant evidence to identify whether the Project is likely to have an impact on EDI and any actions needed to address this. The EDIT was used to identify areas with high densities of population, vulnerable groups, and travel destinations in the Project area, providing an understanding of the extent to which various aspects of the A66 Northern Trans-Pennine Project might affect equality groups. The tool was used to consider the specific need of different equality groups in relation to the Project. The Stage 3 EDIT assessment produced an overall score of 73%, indicating that equality, diversity and inclusion issues are likely to arise during the delivery of the Project. A copy of the Stage 3 EDIT assessment is provided in Appendix C. Within the EDIT, Sections 2 (Project Information), 3 (Design Information) and 5 (Construction Effects), involve an assessment of the different aspects of the Project to identify whether EDI is relevant and how. The following aspects of the Project were identified as high scoring areas in terms of likely impact on EDI:

- Main effects of the Project;
- Trunk A-Roads;
- Non-motorised user (NMU) impact; and
- Footways.

2.13 Mitigating Action

Table 11: Mitigation table

Activities to address any potential negative impacts or risks to deliver positive impacts	Provide activity completion dates
Ongoing discussions with the owners of the Happy Hooves Riding Stables around potential impacts on activities at the stables, including RDA and Changing Lives activities; mitigation of the potential adverse effects of construction and operation through the measures contained in the Environmental Management Plan and National Highways facilitation of relocation to an appropriate extent should the business be minded to do so.	Ongoing
Ongoing discussions with representatives of Kirkby Thore Primary School around potential impacts on the outdoor space available at the school, including the duration and timings of works to the overhead cable. to seek to avoid school opening hours.	Ongoing
Discussions will also be had around appropriate mitigation of impacts, and awareness raising around safety in relation to construction sites.	Prior to construction
The Delivery Integration Partners will outline measures within an Environmental Management Plan to mitigate noise, air quality, and construction traffic impacts during construction. The EMP will include detailed plans for the following aspects:	Prior to construction
 Air Quality and Dust Management Plan Noise and Vibration Management Plan Public Rights of Way Management Plan Community Engagement Plan 	



Prior to construction
Prior to construction
Prior to construction
Ongoing
During detailed design
Ongoing

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:

This section outlines at a high level how ongoing engagement and consultation has helped to shape both the conclusions of the Equality Impact Assessment and the design development of the project.

 A review was undertaken of the responses from the 2021 statutory consultation, and a summary of the key issues in relation to equality impacts, divided by



- protected characteristic, is provided in Section 2.8 above. This has informed the assessment of equality impacts.
- Targeted consultation and ongoing engagement with representatives of the gypsy and traveller community has been continuous throughout all stages of the Project and has informed both design development and mitigation. Ongoing consultation with the gypsy and traveller population and their Shera Rom has shaped the design response in the vicinity of Appleby-in-Westmorland. It has influenced the design and location of the junction proposals, resulting in the removal of direct impacts on the Fair Hill site for Appleby Horse Fair. It has also helped to shape the form of mitigation/choice of replacement site for Brough Hill Fair.

Only where available and only where appropriate in line with General Data Protection Regulation (GDPR) include photographic evidence or links to the difference made via the EqIA activity. E.g., images of a successful installation of footbridges, shared accessible footpaths. (Ignore if not appropriate or where no permissions to use images could be provided) (For National Highways internal records):

N/A

Where appropriate - Link to evidence of communication/inclusion action plans, environmental assessments or EDIT exercises.

(For National Highways internal records):

EDIT: A completed copy of the EDIT Tool can be found in Appendix C

G: Monitoring (Stage 3)

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

Agreed actions to implement the findings of this assessment.

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



2.14 Monitoring action

Monitoring Action	By Whom	By When
Monitoring of diversity in skills and employment strategy including any impacts on protected characteristic groups.	Delivery Integration Partners (DIPS) as part of the EMP	During construction
Dust monitoring where dust soiling is occurring and where appropriate mitigation measures can be enhanced to reduce soiling. This is secured by commitments in the EMP. This should include monitoring of sensitive locations where there are known equalities receptors.	Delivery Integration Partners (DIPS) as part of the EMP	During construction
Noise monitoring. This should include monitoring of sensitive locations where there are known equalities receptors.	Delivery Integration Partners (DIPS) as part of the EMP	During construction

H: Sign-off by National Highways 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 <u>Directorate's Equality</u>, <u>Diversity and Inclusion Advocate</u>
 http://share/Share/llisapi.dll?func=ll&objaction=overview&objid=33434433 for quality assurance and registration.
- For all MP schemes please contact <u>MP Representative for the National</u> <u>Highways Diversity Group</u>
- 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.



3 Glossary and Abbreviations

Glossary

Term	Definition
Appleby Horse Fair	Appleby Horse Fair is a historic gathering of Gypsies and Travellers which takes place annually at Appleby-in-Westmorland.
Accommodation overpass/underpass/structure	A bridge under or over the A66 that serves an affected area of land or property, not considered a public highway.
Air Quality Management Area (AQMA)	An area within a local authority boundary where the air quality objectives are not likely to be achieved. The local authority is required to declare the area as an air quality management area and to prepare a local air quality action plan.
Application	This refers to an application for a Development Consent Order. An application consists of a series of documents and plans which are submitted to the Planning Inspectorate and published on its website.
Area of Outstanding Natural Beauty (AONB)	An area designated under Section 82(1) of the Countryside and Rights of Way Act 2000 for the purpose of conserving and enhancing its natural beauty.
Assessment	A process by which information about effects of a proposed plan, project or intervention is collected, assessed and used to inform decision-making.
Baseline	Existing environmental conditions present on, or near a site, against which future changes can be measured or predicted.
Brough Hill Fair	Brough Hill Fair is a is a historic gathering of Gypsies which takes place annually at a site approximately 1.2km to the east of Warcop and adjacent to the southern edge of the A66.
Consent	A statutory permission given to an applicant by a statutory authority, such as the local planning authority or the Secretary of State, that allows a development to be carried out within a specific area of land.
Consultation	A process by which regulatory authorities, statutory and non-statutory bodies, local authorities, local communities, and those with an interest in the land are approached for information and opinions regarding a development proposal.
County	England is divided into 48 ceremonial counties, which are also known as geographic counties, used for the purposes of administrative, geographical and political demarcation.
Development Consent Order (DCO)	The means of obtaining consent for developments categorised as nationally significant infrastructure projects under the Planning Act 2008.
Effect	Term used to express the consequence of an impact (expressed as the 'significance of effect'), which is determined by correlating the magnitude of the impact to the importance, or sensitivity, of the receptor or resource in accordance with defined significance criteria. For example, land clearing during construction results in habitat loss (impact), the



Term	Definition
	effect of which is the significance of the habitat loss on the ecological resource.
Embedded mitigation	Design measures which are integrated into a project for the purpose of minimising environmental effects.
Environment Agency	The Environment Agency is responsible for environmental protection and regulation in England and plays a central role in implementing the government's environmental strategy. The Environment Agency is the main body responsible for managing the regulation of major industry and waste, treatment of contaminated land, water quality and resources, fisheries, inland river, estuary and harbour navigations and conservation and ecology. They are also responsible for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.
Environmental assessment	A method and a process by which information about environmental effects is collected, assessed and used to inform decision-making.
Environmental Assessment Report	Documents the findings of an Environmental Assessment.
Environmental Impact	Any change to the environment, whether adverse or beneficial
Environmental Impact Assessment (EIA)	DMRB LA 104 Environmental assessment and monitoring (DMRB LA 104) (Highways England, 2020)² defines EIA as: Statutory process consisting of: 1) preparation of an Environmental Statement 2) consultation 3) examination by the competent authority of the information contained within the Environmental Statement 4) the reasoned (justified or evidenced) conclusion by the competent authority on the significant effects of the Project on the environment 5) the reasoned (justified or evidenced) decision by the competent authority to grant or refuse development consent
Environmental Management Plan (EMP)	Provides the framework for recording environmental risks, commitments and other environmental constraints and clearly identifies the structures and processes that will be used to manage and control these aspects. The EMP also seeks to ensure compliance with relevant environmental legislation, government policy objectives and Project specific environmental objectives. It also provides the mechanism for monitoring, reviewing and auditing environmental performance and compliance.
Environmental Statement (ES)	A statutory report produced by the developer including: 1) a description of the project 2) a description of the likely significant effects of the project on the environment 3) a description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment 4) a description of the reasonable alternatives 5) a non-technical summary 6) any additional information relevant to the characteristics of a project.



Term	Definition
Gypsies and Travellers	Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.
Heavy Goods Vehicle (HGV)	A goods vehicle over 3.5 tonnes, including rigid and articulated lorries.
Impact	Change that is caused by an action (for example land clearing (action) during construction which results in habitat loss (impact)).
Legislation	A law or set of laws proposed by a government and given force/made official by a parliament.
Local Authority	An administrative body of local government.
Lowest Observed Adverse Effect Level (LOAEL)	This is the level of noise exposure above which adverse effects on health and quality of life can be detected.
Mitigation	Measures including any process, activity, or design to avoid, reduce, remedy or compensate for negative environmental impacts or effects of a development.
Mitigation measures	Methods employed to avoid, reduce or remedy significant adverse impacts of development proposals.
Monitoring	A continuing assessment of the performance of the Project, including mitigation measures. This determines if effects occur as predicted or if operations remain within acceptable limits, and if mitigation measures are as effective as predicted.
Nationally Significant Infrastructure Project (NSIP)	Large scale developments which require a type of consent known as 'development consent' under procedures governed by the Planning Act 2008.
Natural England	Natural England was established by the Natural Environment and Rural Communities Act 2006. Their purpose is to help conserve, enhance and manage the natural environment for the benefit of present and future generations, thereby contributing to sustainable development.
Operational	The functioning of a project on completion of construction.
Order limits	The extent of land required for the Project
Parish Council	A civil local authority in England, the lowest tier of local government. They are elected corporate bodies, have variable tax raising powers, and are responsible for areas known as civil parishes, serving in total 16 million people.
Planning Inspectorate (PINS)	The government agency responsible for operating the planning process for nationally significant infrastructure projects and for examining applications for development consent under the Planning Act 2008, on behalf of the Secretary of State.
PM ₁₀	Particulate matter with a diameter of 10 microns or less.
Preliminary design	The design on which the application for development consent is based.
Programme	A series of steps that have been identified or series of projects that are linked by dependency.



Term	Definition
Protected Characteristic Groups (PCGs)	A protected group is a group of people sharing a common trait who are legally protected from being discriminated against on the basis of that trait. Under the Equality Act 2010 this includes: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
Public Rights of Way (PRoW)	A way over which the public have a right to pass and repass. The route may be used on foot, on (or leading) a horse, on a pedal cycle or with a motor vehicle, depending on its status. Although the land may be owned by a private individual, the public may still gain access across that land along a specific route
Receptor	A defined individual environmental feature usually associated with population, fauna and flora that has potential to be affected by a project.
Project	This Project comprises of eight individual schemes. Scheme names are (west to east): • M6 Junction 40 to Kemplay Bank • Penrith to Temple Sowerby • Temple Sowerby to Appleby • Appleby to Brough • Bowes Bypass • Cross Lanes to Rokeby • Stephen Bank to Carkin Moor • A1(M) Junction 53 Scotch Corner
Scoping	The process of identifying the issues to be addressed by the EIA process under the EIA Regulations.
Secretary of State (SoS)	The Secretary of State for Transport.
Seldom Heard Groups	The term 'seldom-heard groups' refers to under-represented people who use or might potentially use health or social services and who are less likely to be heard by these service professionals and decision-makers. These groups used to be described as "hard to reach" – suggesting that there is something that prevents their engagement with services. "Seldom heard" emphasises the responsibility of agencies to reach out to excluded people, ensuring that they have access to health and social care services and that their voices can be heard, and is preferred for those reasons.
Sensitivity	The extent to which the receiving environment can accept and accommodate change without experiencing adverse effects.
Significant Observed Adverse Effect Level (SOAEL)	This is the level of noise exposure above which significant adverse effects on health and quality of life occur.
Stakeholder	An organisation or individual with a particular interest in the project.
Statutory	Related to legislation or prescribed in law or regulation.
Statutory consultees	Organisations that must be consulted on relevant projects. Statutory Consultees are listed in Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009
Statutory Environmental Bodies (SEB)	Environment Agency, Historic England and Natural England.



Term	Definition
Unitary Authority	A unitary authority is a local authority responsible for all local government functions within its area or performing additional functions that elsewhere are usually performed by a higher level of sub-national government or the national government.
Walkers, cyclists and horse riders	Walkers, cyclists and horse riders using the network.

Abbreviations

Abbreviation	In full
BHS	British Horse Society
C of E	Church of England
DCO	Development Consent Order
DIPs	Delivery Integration Partners
EDI	Equality, Diversity and Inclusion
EDIT	Equality, Diversity and Inclusion Tool
EIA	Environmental Impact Assessment
ЕМР	Environmental Management Plan
ES	Environmental Statement
EqIA	Equality Impact Assessment
HGV	Heavy Goods Vehicle
loD	Indices of Deprivation
LSOA	Lower Super Output Area
MASCG	Multi-Agency Strategic Coordinating Group
NMU	Non-Motorised Users
NOMIS	National Online Manpower Management Information System
ONS	Office for National Statistics
PCF	Project Control Framework
PCG	Protected Characteristic Group
PDD	Programme Delivery Director
PEIR	Preliminary Environmental Information Report
PRoW	Public Rights of Way
PSED	Public Sector Equality Duty
RDA	Riding for the Disabled Association
SOCG	Statement of Common Ground
SRO	Senior Responsible Owner
WCH	Walkers, Cyclists and Horse Riders
WCHAR	Walking, Cycling and Horse-Riding Assessment and Review



A References

Multi-Agency Strategic Co-ordinating Group (2019) Appleby Fair Strategy 2019-2022

National Highways (2017) Equality Impact Screening and Assessment (EqIA) Overview and Guidance: Helping You to Consider the Needs of People

Richmondshire District Council (2013) Gypsies and Travellers Accommodation Assessment

UK Government (2010) Equality Act 2010

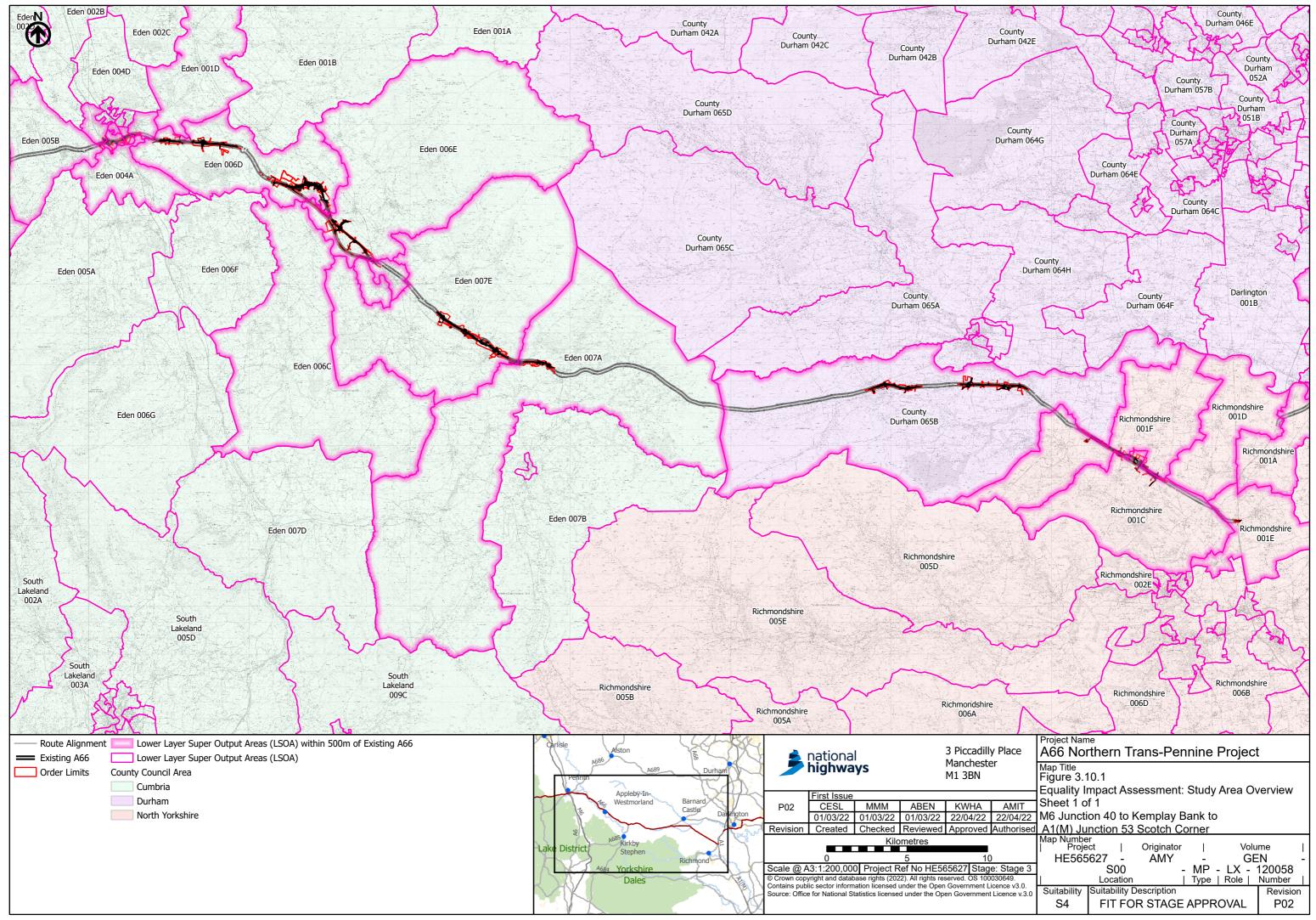
University of Salford (2008) Cumbria Gypsy and Traveller Accommodation Needs Assessment'

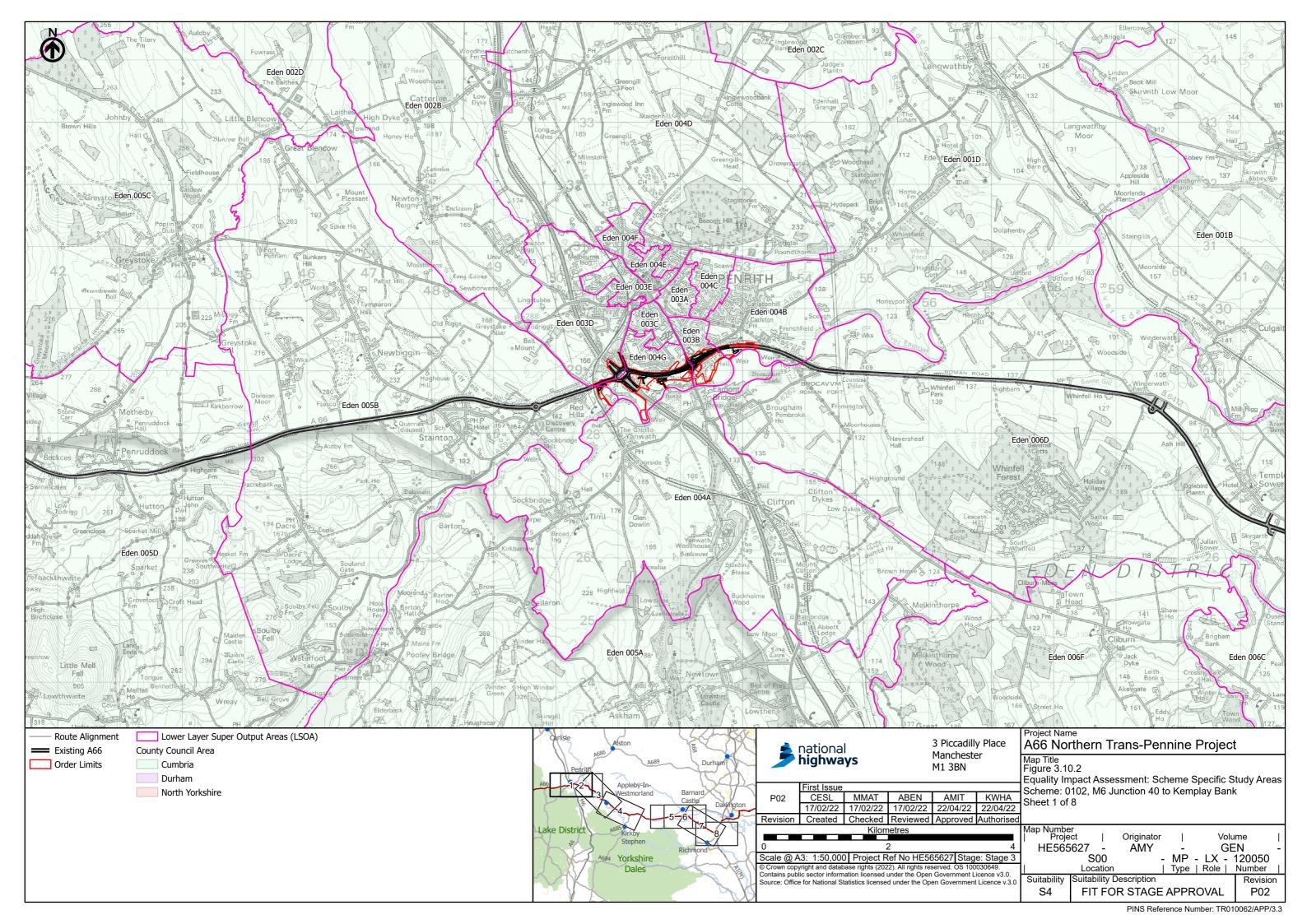


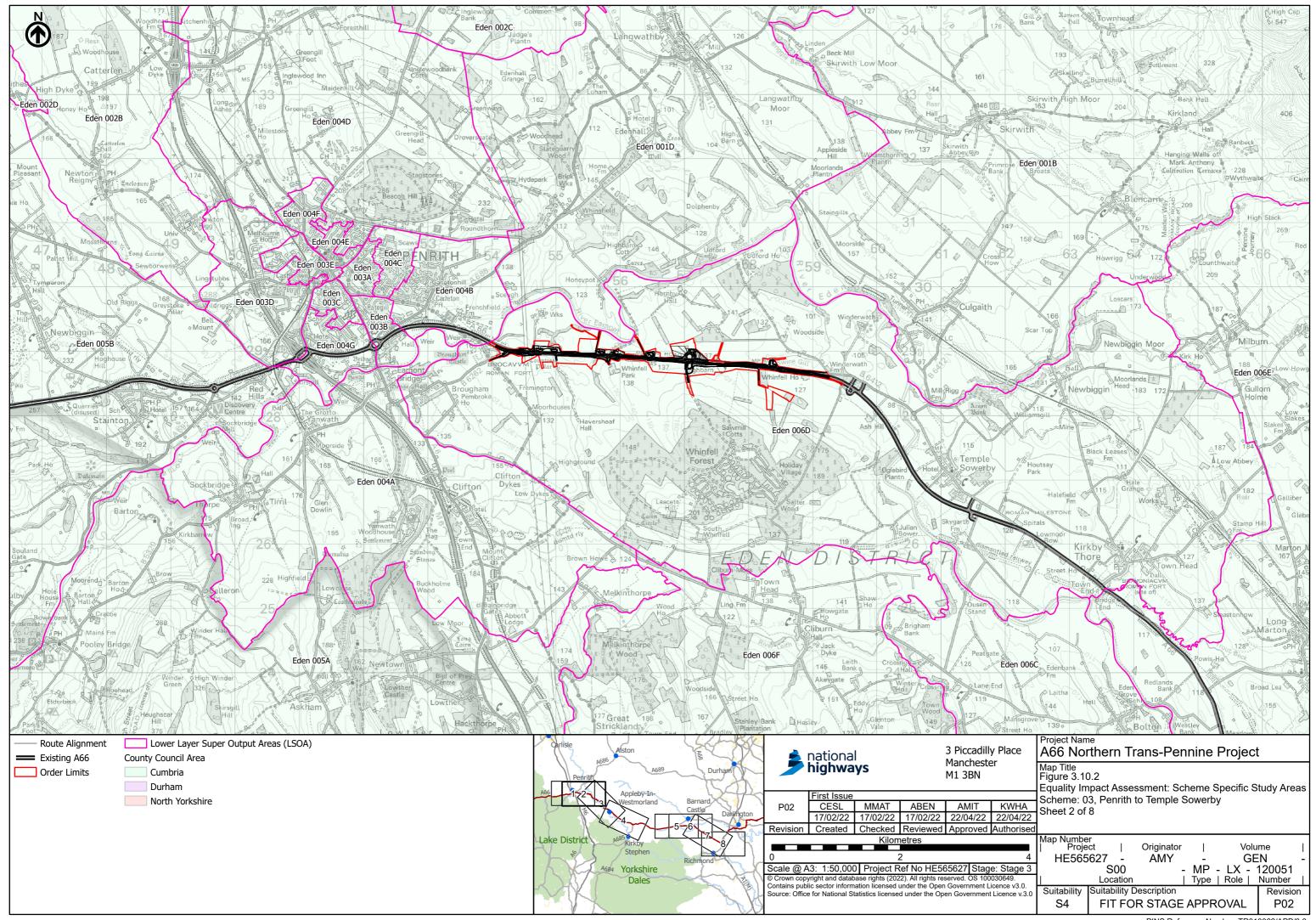
B Figures

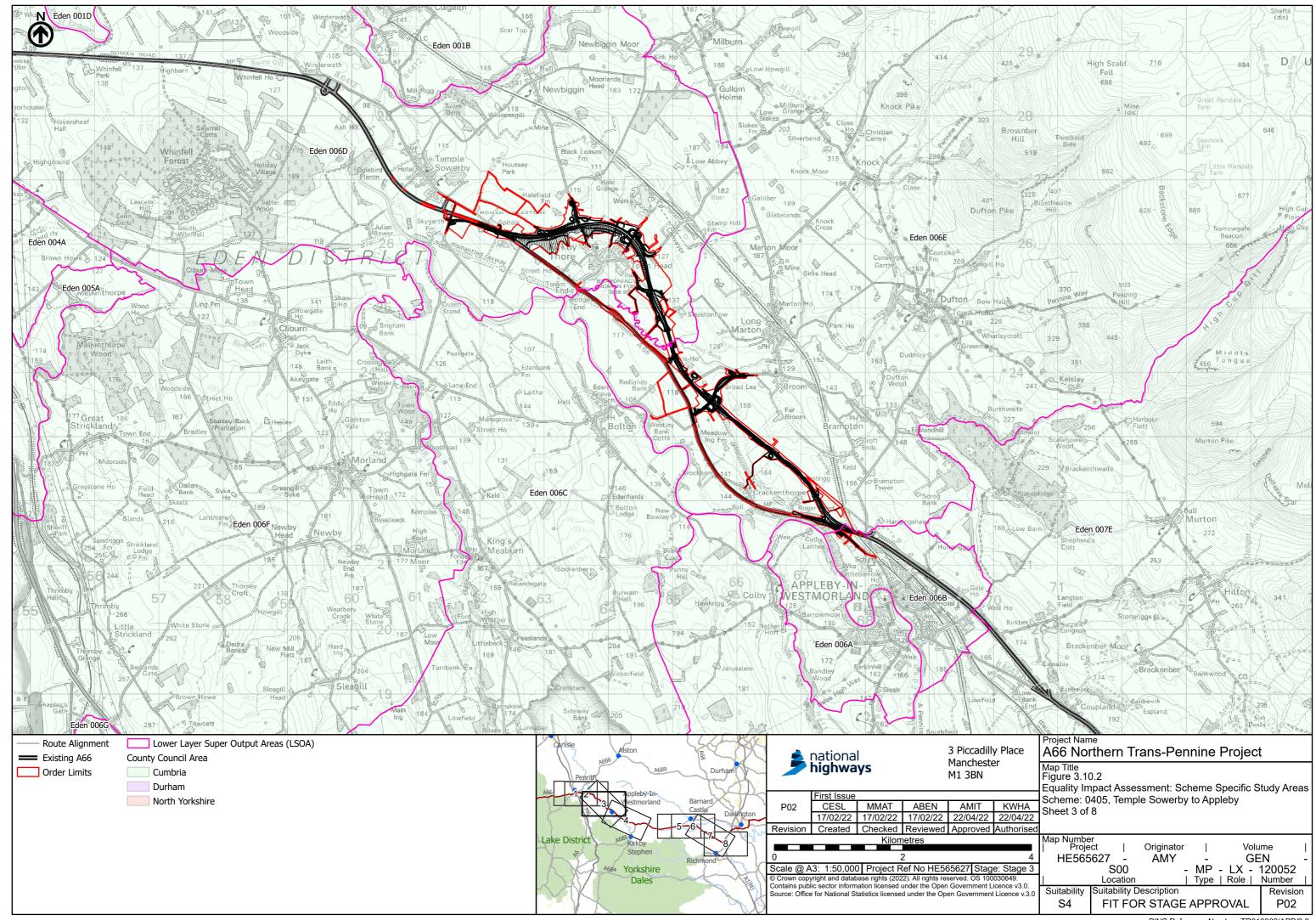


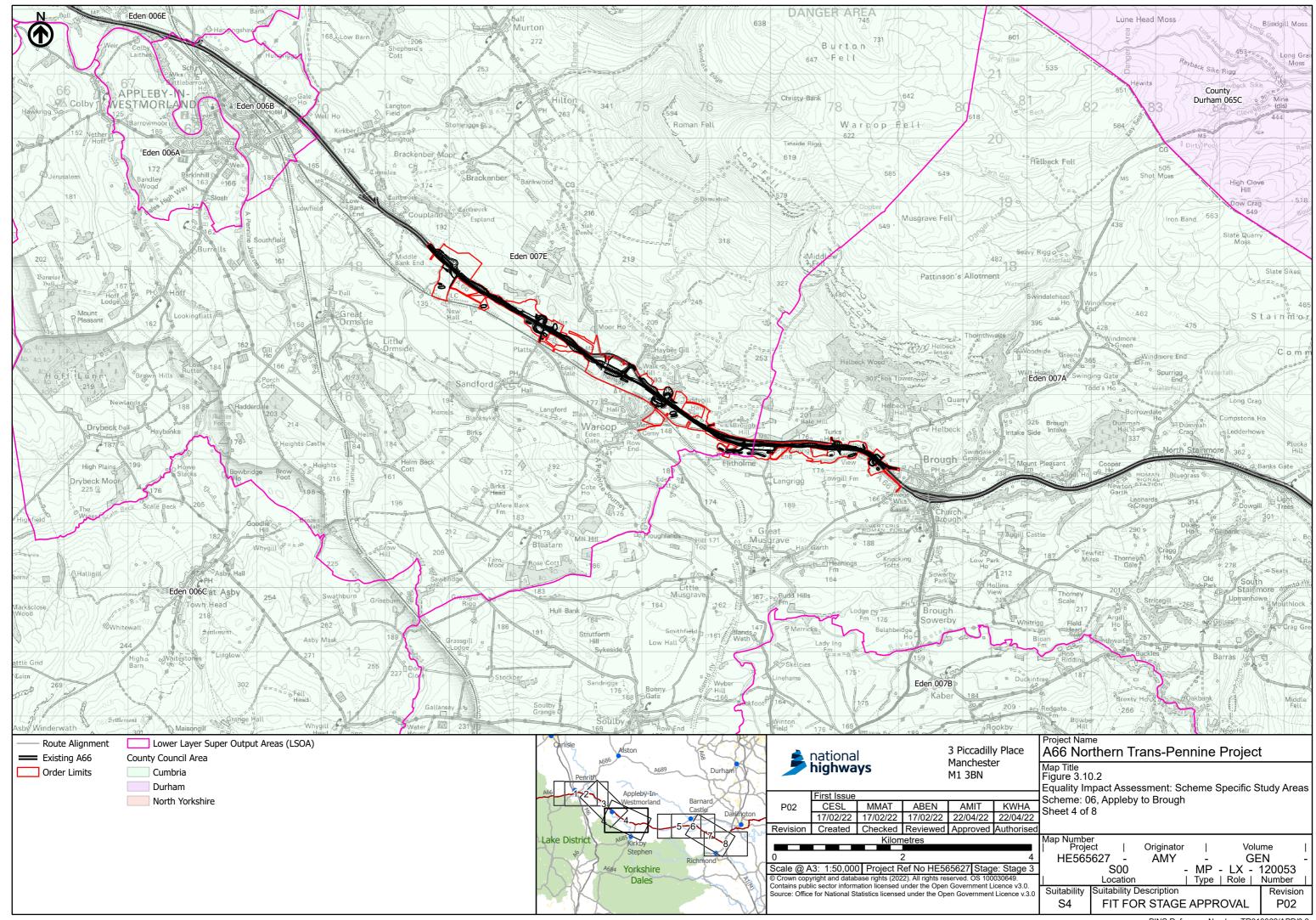
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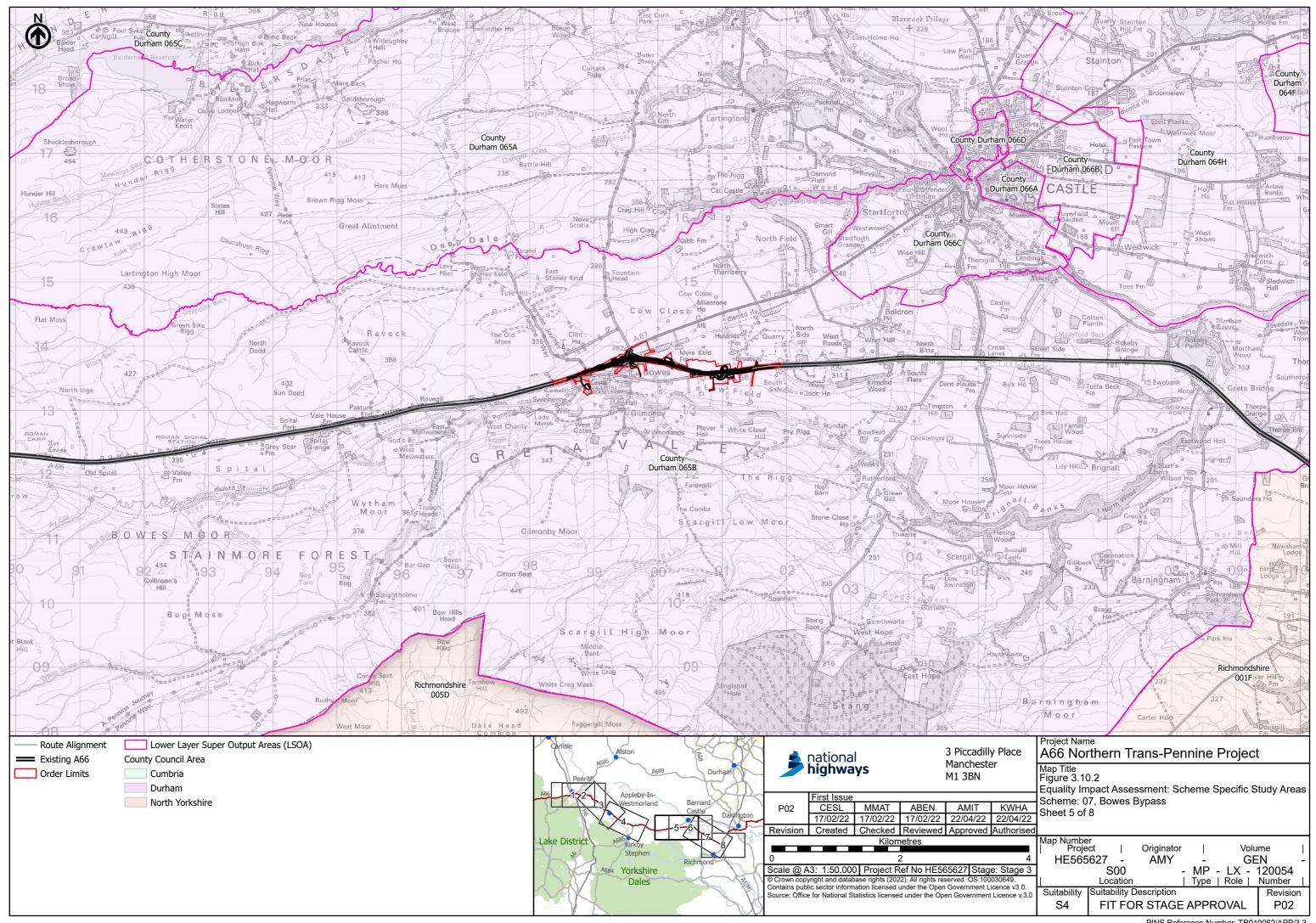


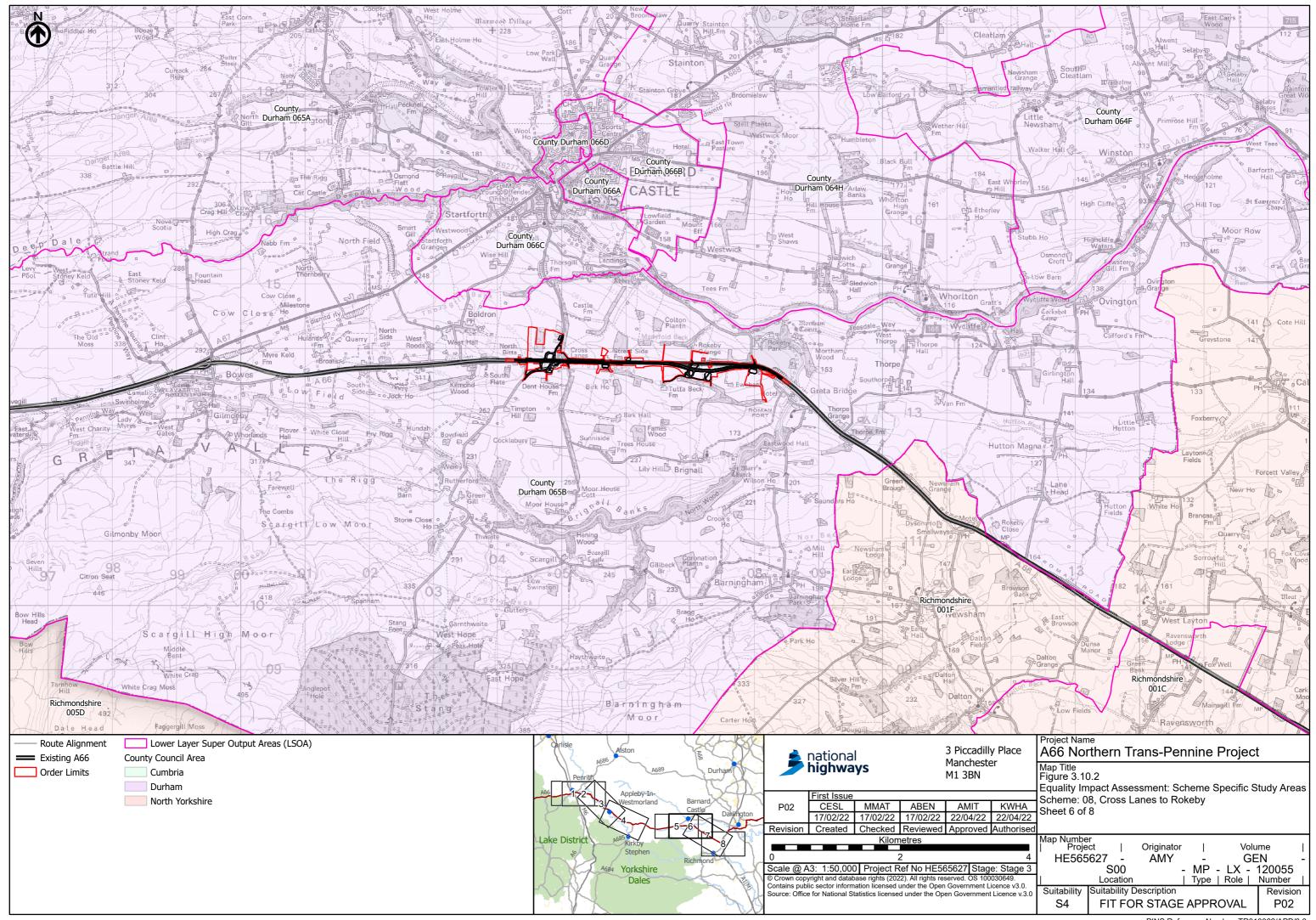


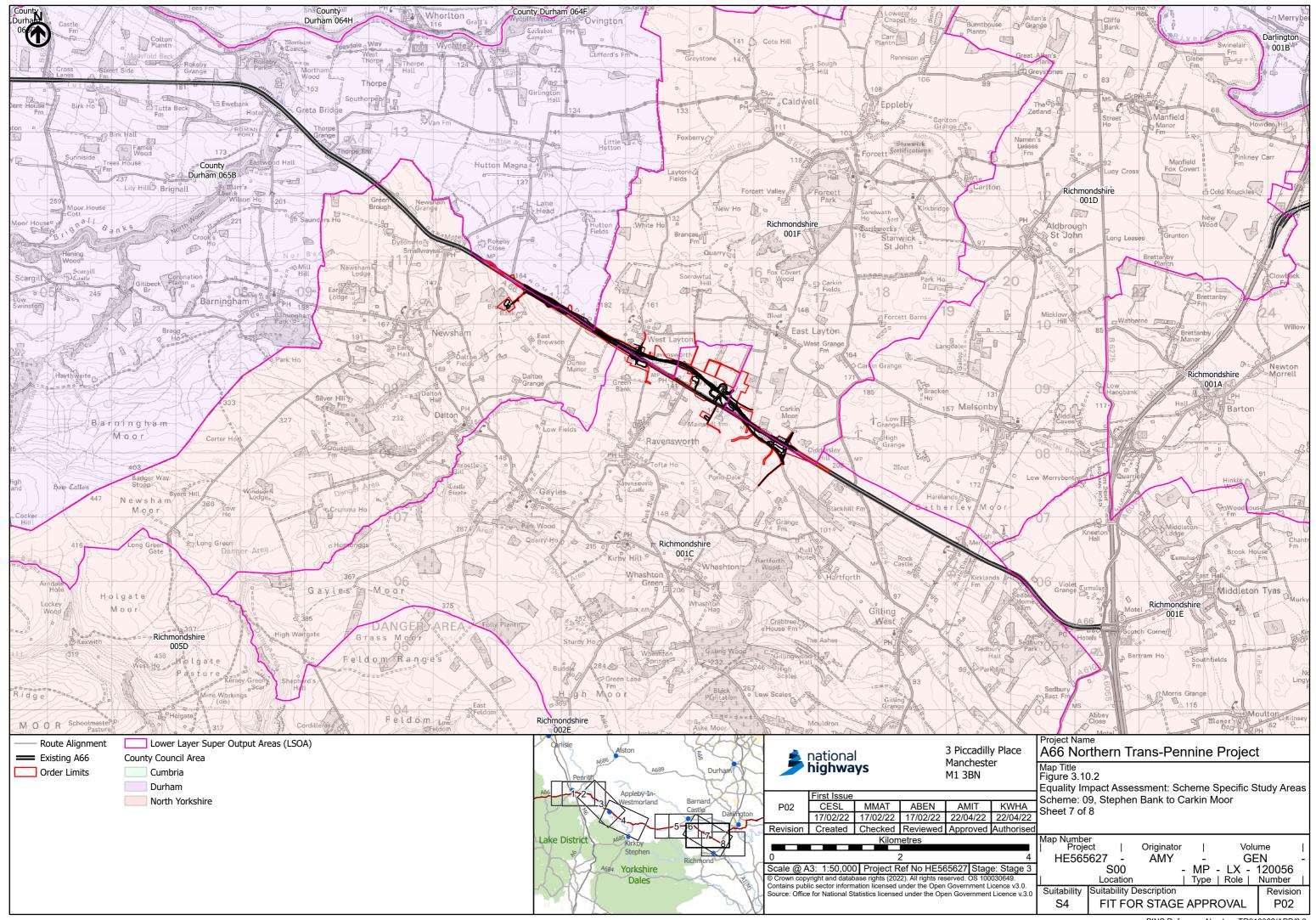


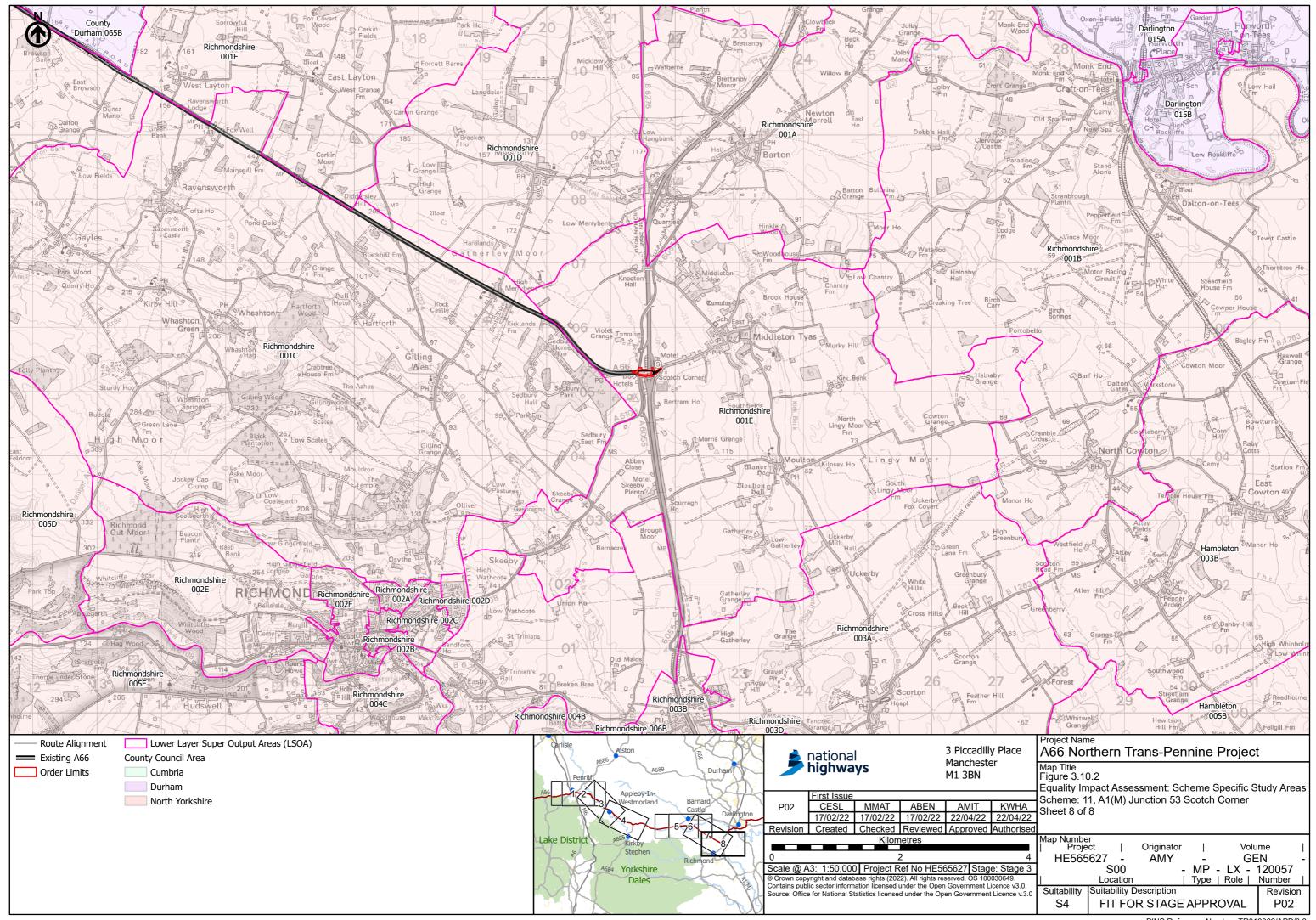






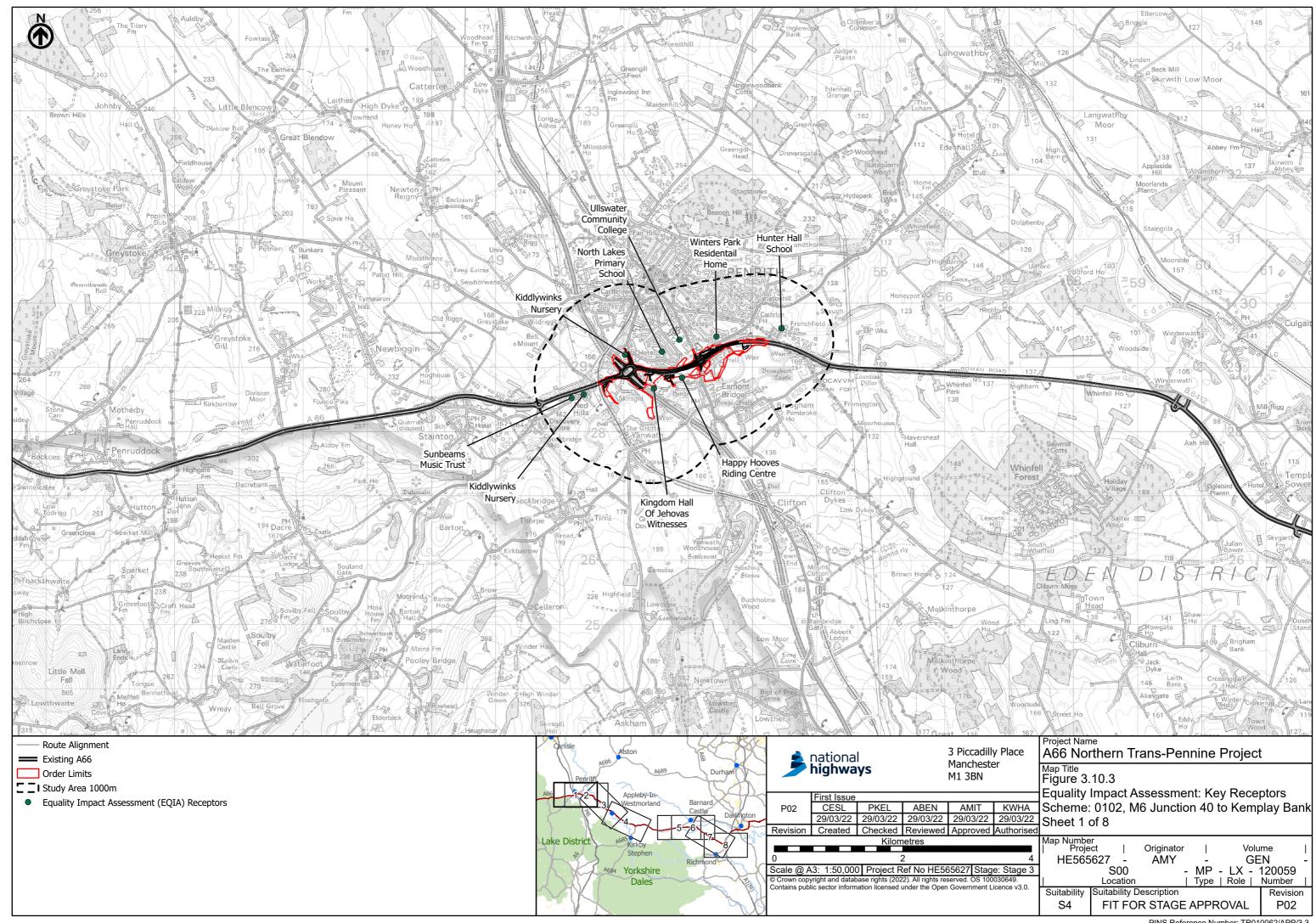


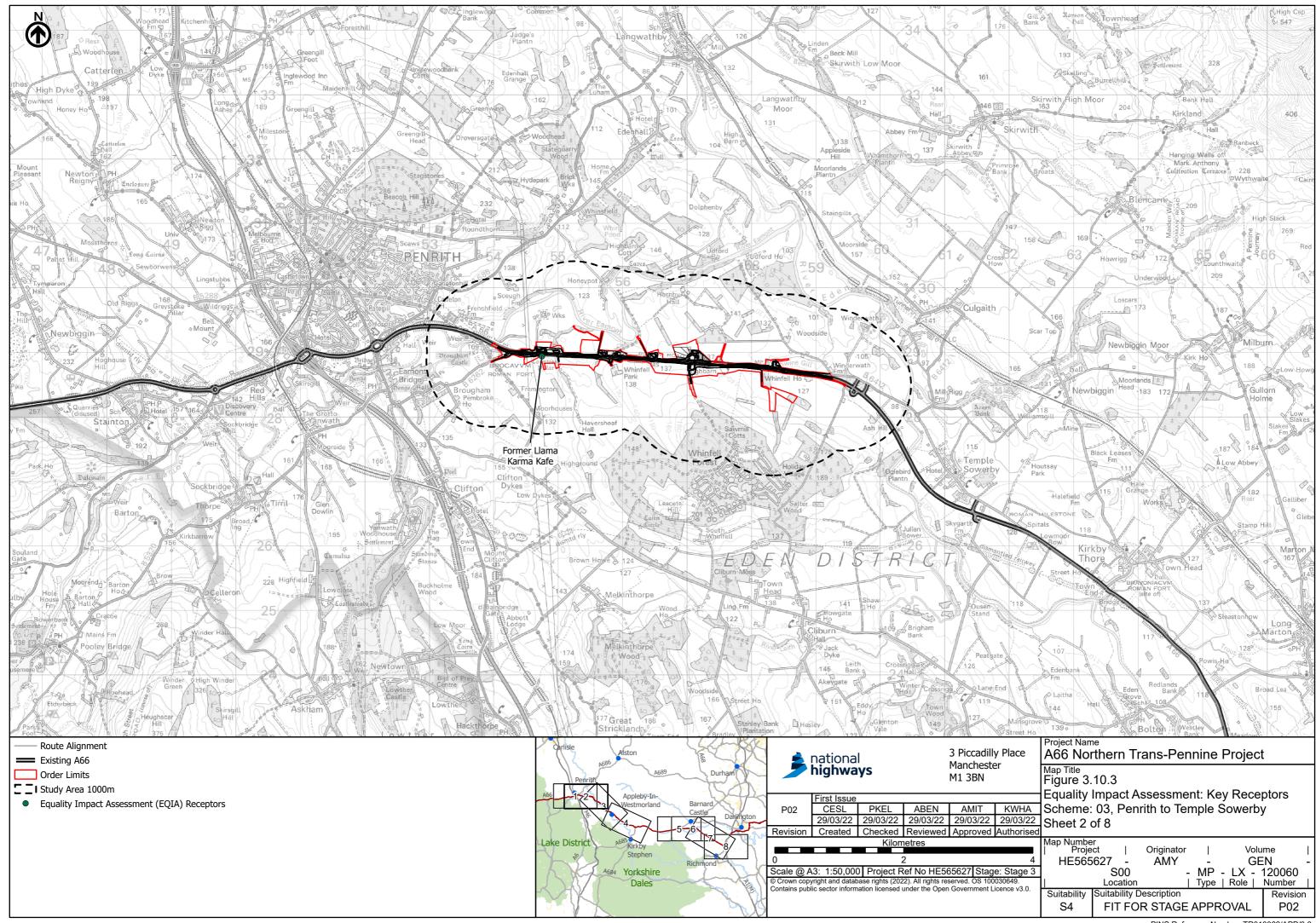


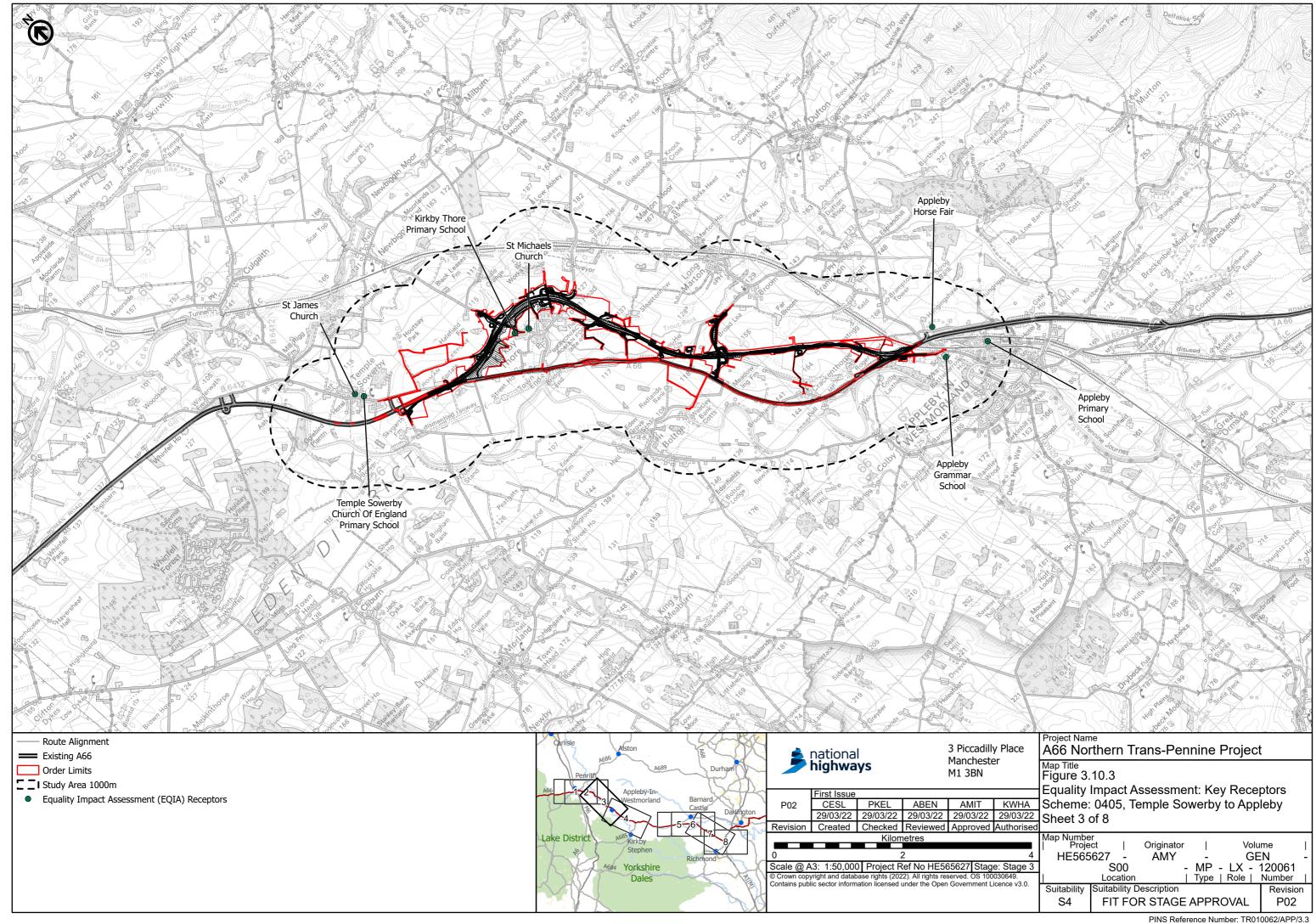


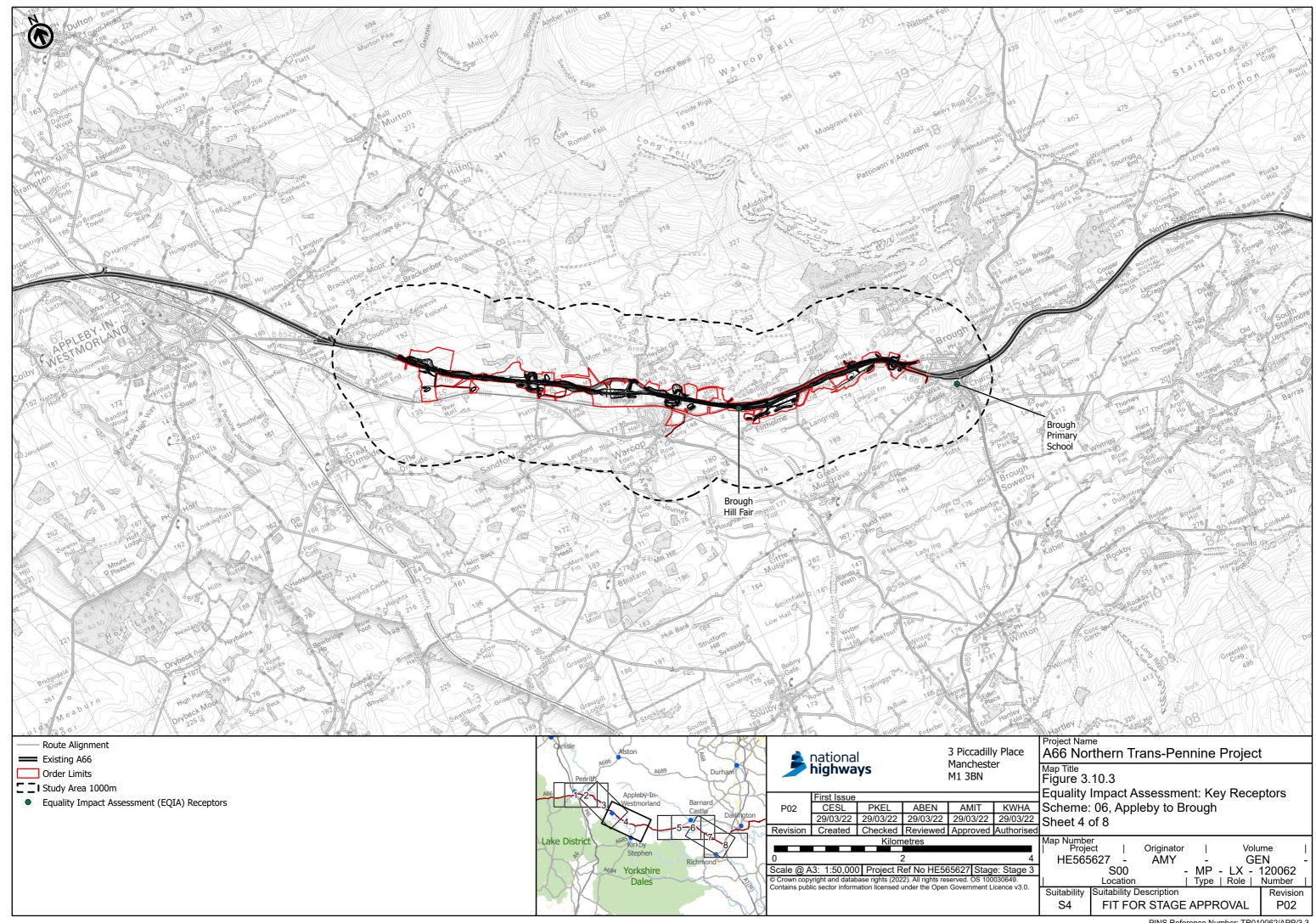


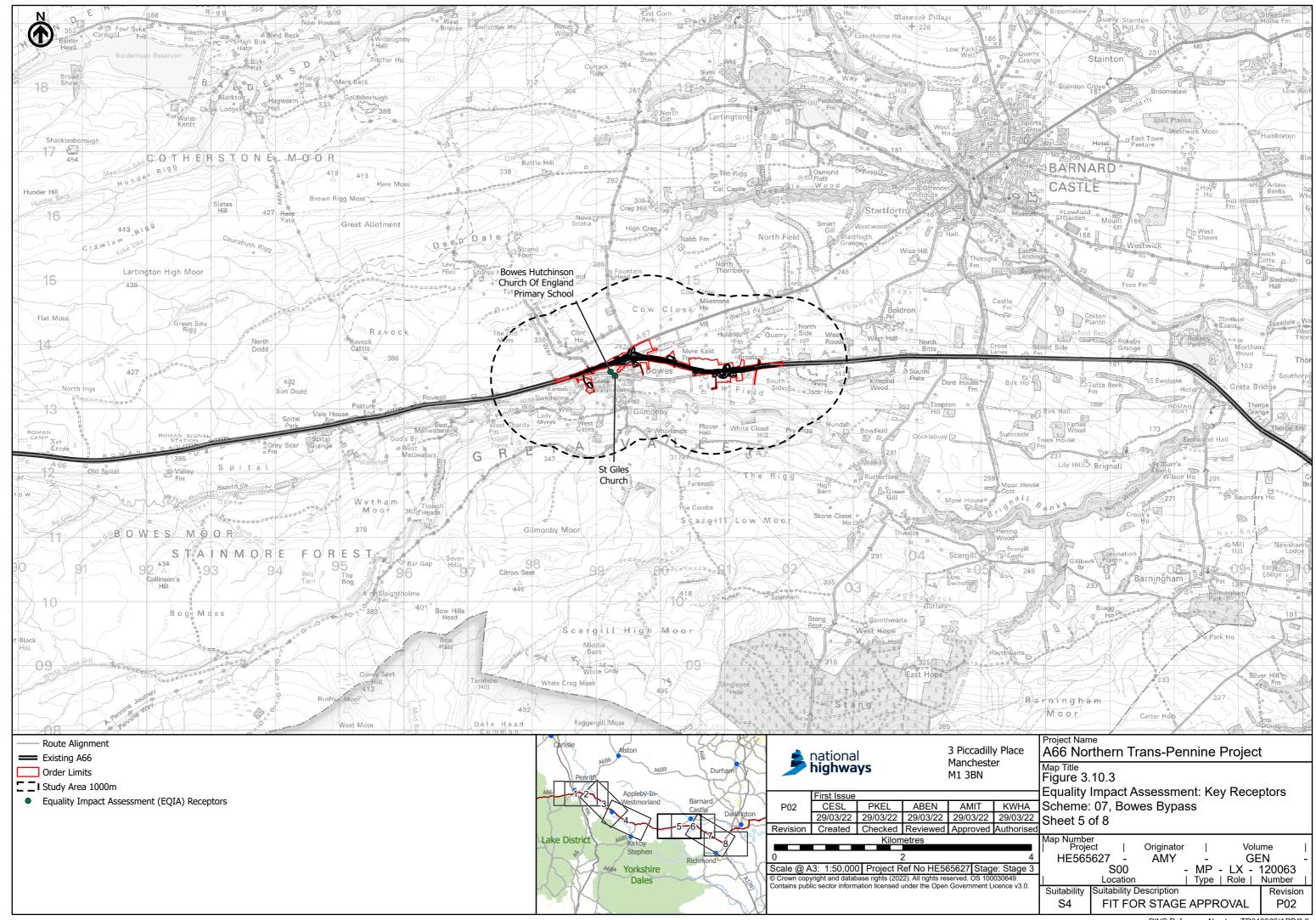
B.2 Map of equalities receptors

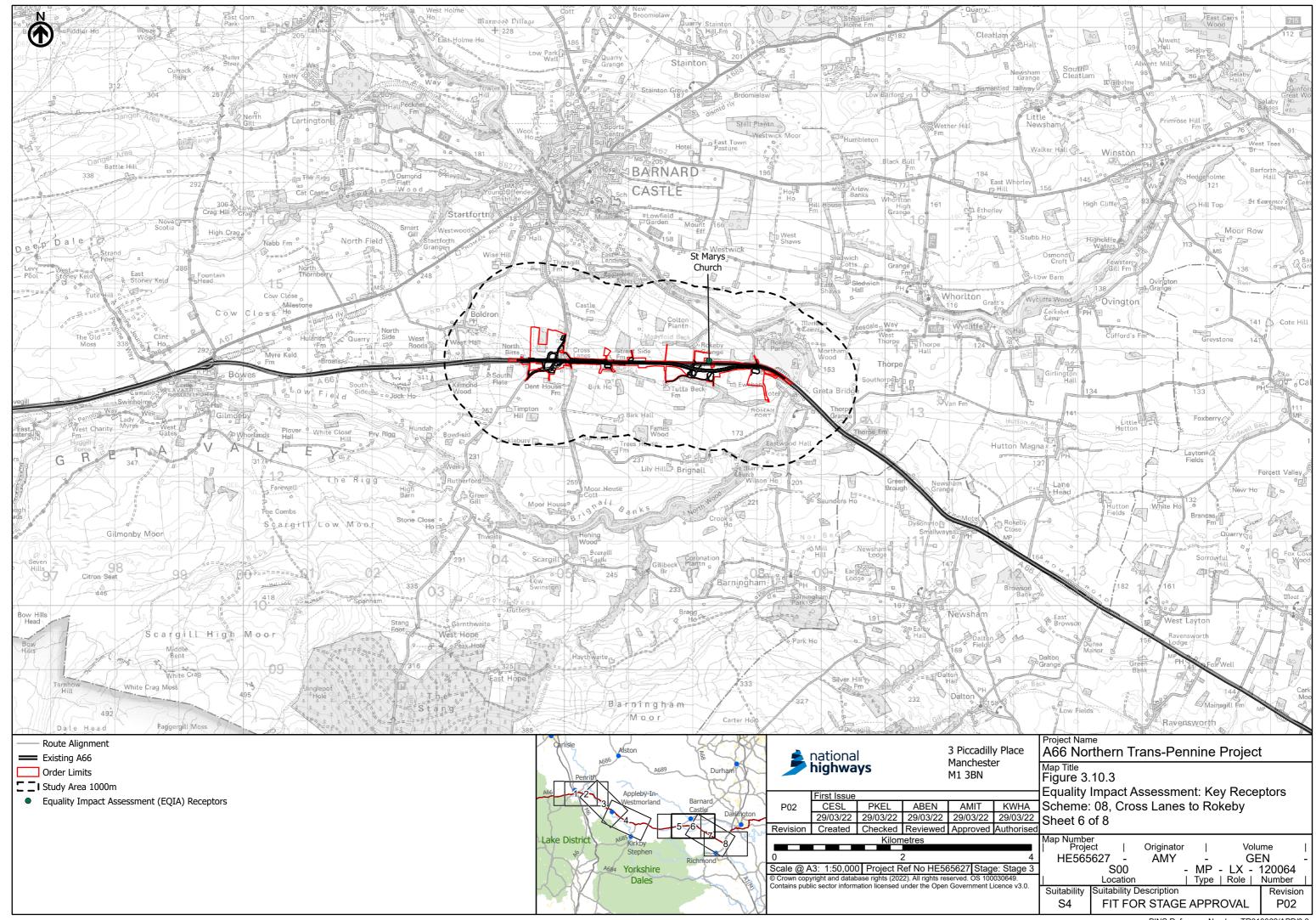


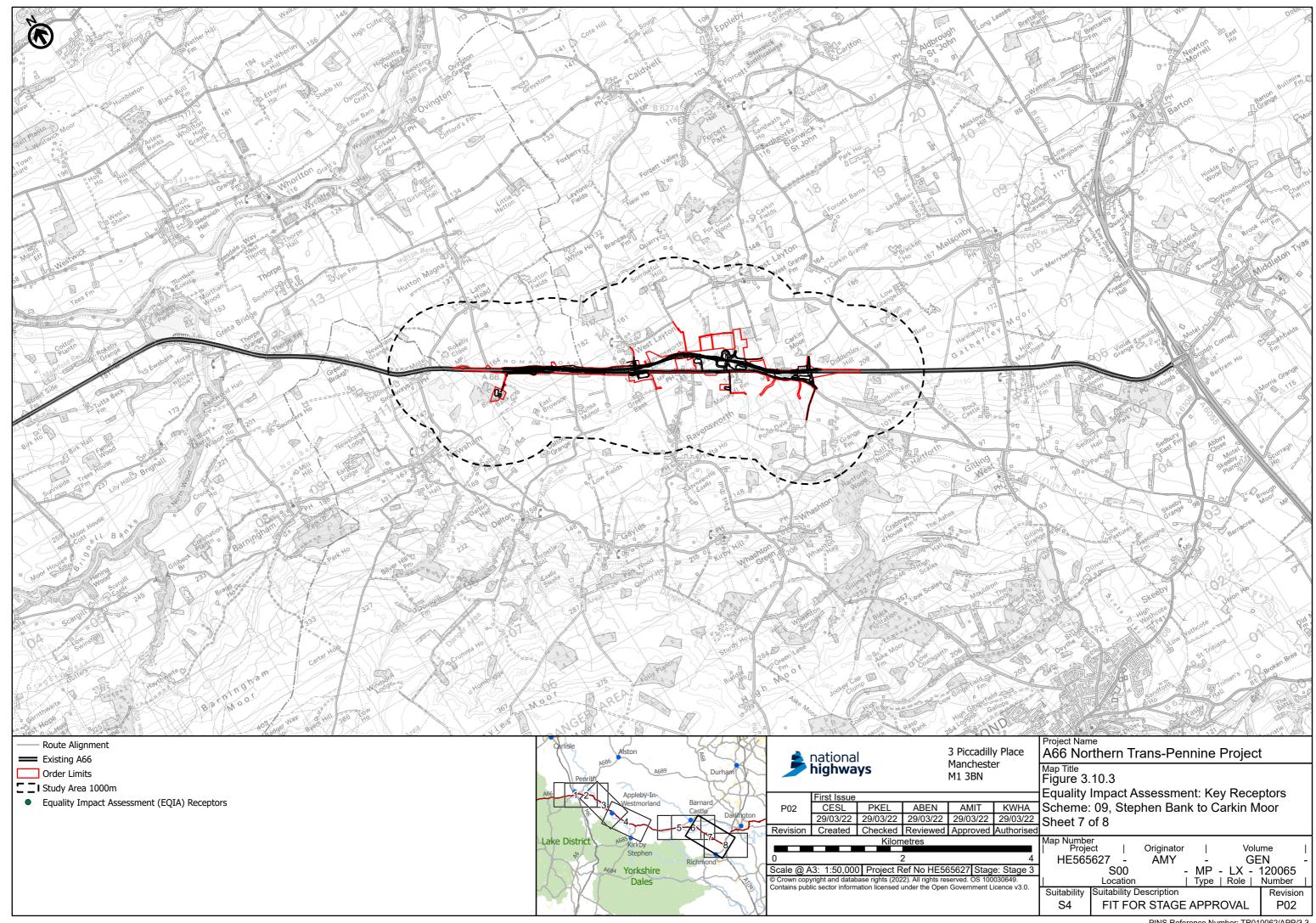


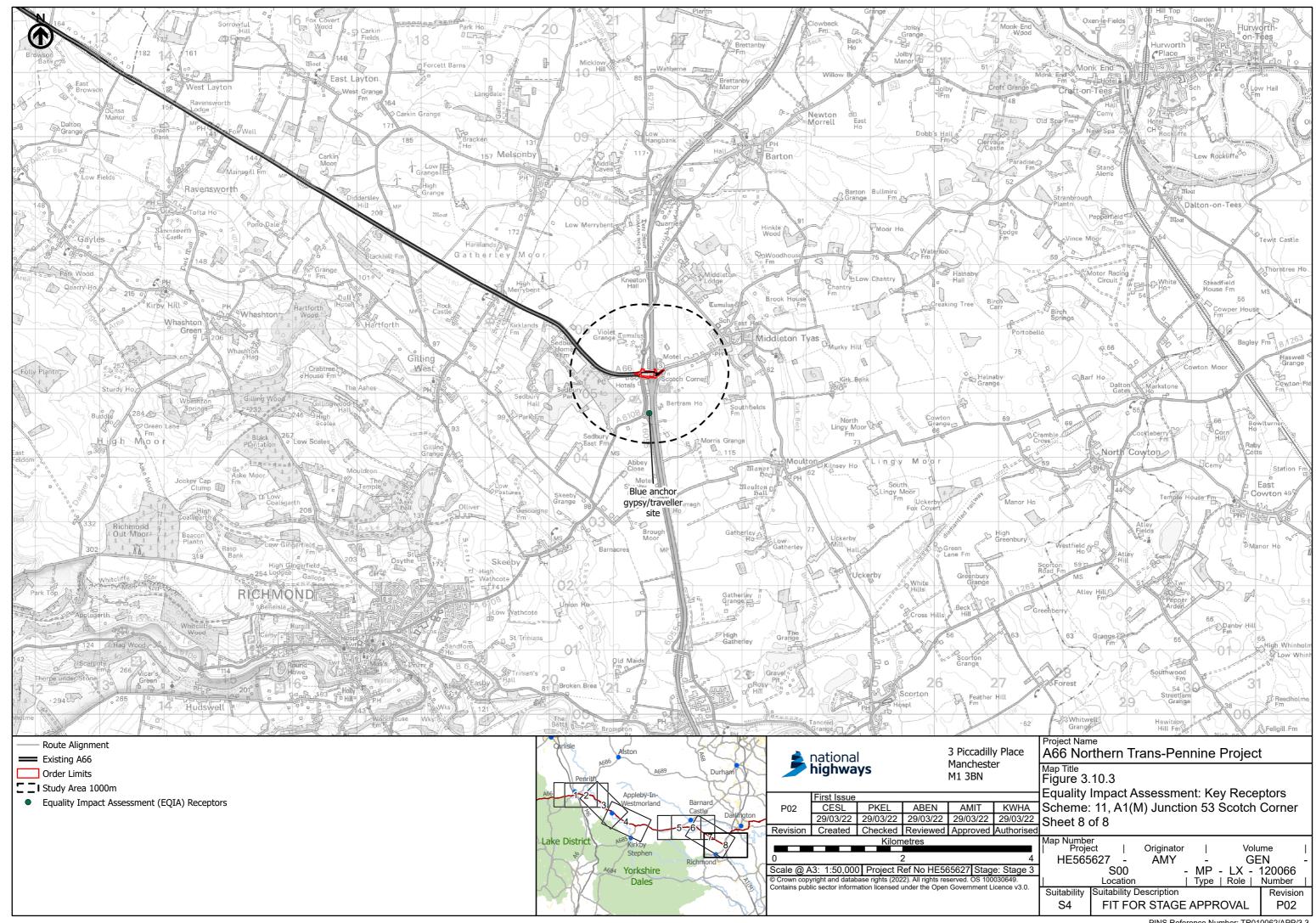














C EDIT tool





E-D-I-T

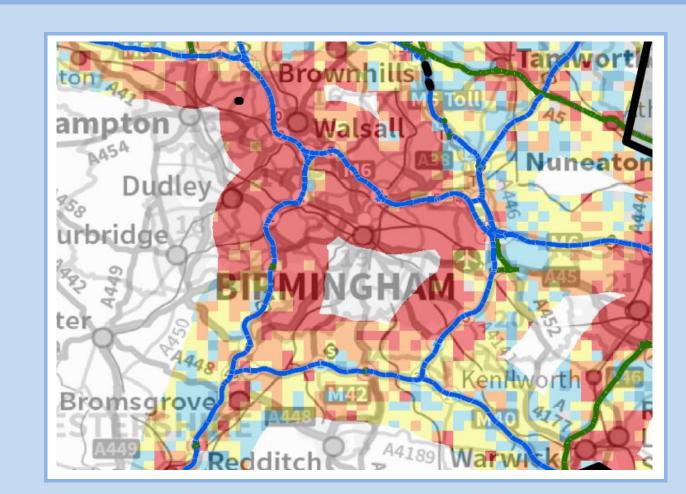
Equality, Diversity and Inclusion Tool

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 '①' 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

Age

- Children (aged under 16)
- Younger people (aged 16-24)
- Working age people (aged 16-64) Older working age people (age 55 and
- Older people of retirement age (age 65 and over)

Disability

- Mobility impairments (e.g. wheelchair
- Sensory impairments (e.g. blind, deaf)
- Learning disabilities
- Mental wellbeing disabilities
- Serious illness (e.g. cancer, AIDS)

Gender reassignment

- People who consider themselves to be
- Anyone at any stage of gender reassignment
- Holders of gender recognition certificate

Marriage and Civil partnership

- People who are married
- People who are in a civil partnership People who are single (unmarried, divorced, widowed)

Pregnancy and maternity

- Women who are pregnant Women who are on statutory maternity leave (up to six months after their baby
- is born) Women with very young children
- Breastfeeding mothers

Race and ethnicity

- People from Black and Minority Ethnic communities
- (BAME) White British and Non White
- British people Different BAME categories (e.g. black people), and subcategories (e.g. Black Caribbean people)

Religion and belief

- People from religious groups People from minority faiths (such as Buddhism, Hinduism, Judaism, Islam and Sikhism)
- Christians People with no religion and atheists

Sex / gender

Men Women

Sexual orientation

 Heterosexuals Lesbian, gay and bi-sexual people (LGB)

Other groups who would potentially experience disadvantage

Poverty

- People living in income
- deprived areas • People living in employment deprived areas

Accessibility

 People living in access deprived areas

Health inequality

- People living with a Long Term Limiting Illness (LTLI) People claiming Disability
- Living Allowance People from health deprived

Rural communities

 People living in areas defined as very rural or predominantly rural

Car ownership

 People living in households without a car

Other non-motorised and vulnerable users

Pedestrians

- People travelling on foot Including disabled pedestrians
- People using footpaths or public rights of way

Cyclists

- People travelling by bicycle
- People using cycle routes, cycle paths, or the
- National Cycle Network

Equestrians

- People travelling by horse
- People using bridleways





	. ,	Diversity and Inclusion Tool							
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Ly	our proj								
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①	1.1	Project number / code:	565627						
	1.2	Project title:	A66 Northern Tra	ansPennine Pro	oject				
	1.3	Project manager:	Matthew Townse	end					
	1.4	Contact Email: Telephone:	Matthew.townse +44 7849077771	nd@highways	sengland.	co.uk			
	1.5	Project directorate:	Major Projects (N	ЛР)					
	1.6	Project stage:	PCF Stage 1						
	1.7	Project type:	Offline and wider	ning improven	nent				
	1.8	Project cost range:	£62.8 million - £6	35.1 million					
lity	hotspot	t assessment							
	1.9	Highways England Area:	13 & 14		1.10	Scheme lo	cation:	Penrith -	Scotch Corner
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	For each I 1. An equality g 2. A popu 3. An equality g 4. An equality g 5. A destination of the second of the	Highways England Area five maps are available ality 'hotspot' map - which shows those parts of roups and destinations. Ilation map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality religious buildings and care homes. Using the equality 'hotspot' map: Does the scheme densely populated area? Using the equality numbers map: Does the sto an area with a high number of people from Using the equality proportion map: Does the to an area with a high proportion of people for Using the destinations map: Does the scheme area with a high density of trip attractors? Are there any large, seasonal, temporary attractors.	e: of the Area with concentrations rea with the largest numbers of para with the largest numbers of para with the highest proportions. Area with the highest numbers scheme fall within or near to a scheme fall within or near mequality groups? e scheme fall within or near from equality groups? ne fall within or near to an equality groups?	s of all of the above people from particular of people from particular of destinations such people from particular of destinations of dest	ve - people, ular urticular ch as Unknown	The majority of for all maps explocations at Pello (low to Appleby and management) and the second of	The colour coding Description A 'hotspot' area. High number / propo Medium number / p Low number / propo Very low number / p No population or description, we can be equality proportion, the number in the community of the corridor is generally learned to Kirkby Stephen. The colour coding of the corridor are a generally learned in the corridor is generally learned in the corridor in the corridor is generally learned in the corridor in the	ortions roportions ortions ort	Score to input 5 4 3 2 1 0 bers / proportions) of higher numbers in mer. dor is light blue to of higher numbers at ons, Appleby Horse Vestmorland and
	For each I 1. An equality g 2. A popu 3. An equality g 4. An equality g 5. A destination of the second of the	Ality 'hotspot' map - which shows those parts or roups and destinations. Ilation map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality map - which shows those parts of the Areality religious buildings and care homes. Using the equality 'hotspot' map: Does the scheme densely populated area? Using the population map: Does the scheme densely populated area? Using the equality numbers map: Does the scheme area with a high proportion map: Does the scheme area with a high density of trip attractors? Are there any large, seasonal, temporary attraction of your scheme?	of the Area with concentrations area with the largest numbers of para with the largest numbers of para with the highest proportions. Area with the highest numbers Area with the highest numbers scheme fall within or near to a scheme fall within or near mequality groups? e scheme fall within or near from equality groups? ne fall within or near to an equality groups? ne fall within or near to an equality groups?	s of all of the above people from particular of people from particular of destinations such people from particular of destinations of dest	ve - people, ular urticular ch as Unknown	The majority of for all maps explocations at Pello (low to Appleby and management) and the second of	The colour coding Description A 'hotspot' area. High number / propo Medium number / p Low number / propo Very low number / p No population or description, we can be equality proportion, the number in the community of the corridor is generally learned to Kirkby Stephen. The colour coding of the corridor are a generally learned in the corridor is generally learned in the corridor in the corridor is generally learned in the corridor in the	ortions roportions ortions ort	Score to input 5 4 3 2 1 0 bers / proportions) of higher numbers in mer. dor is light blue to of higher numbers at

Step 1 Score:

49%

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





Step 2: Considering scheme type

Step 2:							
Main of	facts	f the scheme					
iviaini ei	rects of	f the scheme					
			Yes	No	Unknowr		
①	2.1	Does the scheme involve reorganisation of the built environment?	•	0	C	The scheme will invole sections of widening to dual carriageway along a 50 mile corridor of the existing A66.	
①	2.2	It the scheme likely to impact upon community severance?	•	C	O	Where the road deviates from the existing alignment, some	
①	2.3	Are there likely to be disproportionate effects on those without access to a car?	•	С	C	people will be nearer to traffic and some people will be	
①	2.4	Will the scheme impact upon the mobility of non-motorised users?	•	C	C	further away. New alignments will also reduce community	
<u>(i)</u>	2.5	Will the scheme increase levels and speed of traffic ?	•	C	C	severance for some communities. De-trunked sections of the	
		Will the scheme impact upon the distance between people and traffic?	(6)	С	C	former A66 route will create new routes for non-motorised users.	
1	2.6	will the scheme impact upon the distance between people and tranic:				users.	
Primary	henefi	ciaries					
T Tillian y	benen						
		Do the primary beneficiaries of the scheme include any of the following:	1				
			Yes	No	Unknowr	1	
①	2.7	Drivers and their passengers?	•	C	C	The primary beneficiary of the scheme is presently the	
①	2.8	Public transport users?	C	C	•	Strategic road user, predominantley private car users but also	
<u>(i)</u>	2.9	Pedestrians?	C	O	•	likely to include public transport users. There are likely to be	
	2.10	Cyclists?	C	O	•	benefits to pedestrians, cyclists and equestrians from safer crossings of the A66 and new routes for non-motorised users	
① •			C	o	•	along de-trunked sections of the former A66 former - the	
①	2.11	Equestrians?	C	C	œ.	exact extent of these benefits is currently unknown.	
①	2.12	Mobility impaired pedestrians?		•			
Key ass	et: Met	orways					
Rey ass	St. IVIUL	orways					
			Yes	No ©	Unknowr		
(i)	2.13	Is the scheme located entirely on a motorway?		•	Ü		
		Is the scheme likely to have an impact on safety or perceptions of safety of the motorway	-	0	6	N/A	
①	2.14	environment?	_	•		IN/A	
①	2.15	Will the scheme impact upon users ability to leave their vehicle independently or safely?	G	C	<u>©</u>		
U	2.13	Will the scheme impact upon ease of use and accessibility of emergency roadside telephones	C	0	6		
①	2.16	(ERTs)?					
		Will the scheme result in changes to the speed, average likely speed or speed limit on the	C	C	œ.		
①	2.17	section of motorway?					
①	2.18	Will the scheme impact upon the level of information available on the motorway?	C	C	©		
		Managed / smart motorways					
①	2.19	Is the scheme a smart motorway scheme?	•	0	<u>©</u>	N/A	
①	2.20	Will the scheme result in temporary or partial loss of the motorway hard shoulder?	C	O	©		
<u> </u>	2.21	Will the scheme increase the distance between refuge areas?	G	C	<u>©</u>		
U	2.21	with the solicine mareuse are distance between relage areas.					
Key ass	et: Trur	nk A Roads					
Key ass	et: Trur	nk A Roads	Vec	No	Unknowr		
			Yes •	No	Unknowr		
Key ass	et: Trur 2.22	Is the scheme located entirely on a Trunk A Road?	7	No C			
	2.22	Is the scheme located entirely on a Trunk A Road? Trunk A-Roads	7	No C			
		Is the scheme located entirely on a Trunk A Road?	•	С	С	There are a number of residential areas both rural and urban adjacent to the existing route. Urban areas include Penrith,	
① ①	2.22	Is the scheme located entirely on a Trunk A Road? Trunk A-Roads Does the location of the scheme include residential areas immediately adjacent to the carriageway? Does the location of the scheme include particular relevant trip attractors in close proximity to	•	С	С	There are a number of residential areas both rural and urban adjacent to the existing route. Urban areas include Penrith, and rural areas include Temple Sowerby, Cross End,	
① ① ①	2.22 2.23 2.24	Is the scheme located entirely on a Trunk A Road? Trunk A-Roads Does the location of the scheme include residential areas immediately adjacent to the carriageway? Does the location of the scheme include particular relevant trip attractors in close proximity to the carriageway?	e e	c	c c	There are a number of residential areas both rural and urban adjacent to the existing route. Urban areas include Penrith, and rural areas include Temple Sowerby, Cross End, Crackenthrope, Appleby-in-Westmorland, Warcop, Brough,	
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① ① ① ① ① ① ① ① ①	2.22 2.23 2.24 2.25 2.26	Is the scheme located entirely on a Trunk A Road? Trunk A-Roads Does the location of the scheme include residential areas immediately adjacent to the carriageway? Does the location of the scheme include particular relevant trip attractors in close proximity to the carriageway? Does the scheme include sections of road used as an alternative to motorway travel? Does the location of the scheme incorporate public transport usage?	•	c c	C C	There are a number of residential areas both rural and urban adjacent to the existing route. Urban areas include Penrith, and rural areas include Temple Sowerby, Cross End, Crackenthrope, Appleby-in-Westmorland, Warcop, Brough, Bowes, Greata Bridge. Wetheriggs Country Park at Penrith, Appleby Horse Fair at Appleby-in-Westmorland, Brough Hill	
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① ① ① ① ① ① ① ① ①	2.22 2.23 2.24 2.25 2.26 pe: Rura 2.27	Is the scheme located entirely on a Trunk A Road? Trunk A-Roads Does the location of the scheme include residential areas immediately adjacent to the carriageway? Does the location of the scheme include particular relevant trip attractors in close proximity to the carriageway? Does the scheme include sections of road used as an alternative to motorway travel? Does the location of the scheme incorporate public transport usage? all and Urban Areas Is the scheme located primarily in a rural area, an urban area or combination of both? Rural areas	Rural	C C C Urban	Both	There are a number of residential areas both rural and urban adjacent to the existing route. Urban areas include Penrith, and rural areas include Temple Sowerby, Cross End, Crackenthrope, Appleby-in-Westmorland, Warcop, Brough, Bowes, Greata Bridge. Wetheriggs Country Park at Penrith, Appleby Horse Fair at Appleby-in-Westmorland, Brough Hill Fair at Warcop and Wetheriggs animal rescue at Greta Bridge	
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① ① ① ① ① ① Area ty	2.22 2.23 2.24 2.25 2.26 pe: Rura 2.27	Is the scheme located entirely on a Trunk A Road? Trunk A-Roads Does the location of the scheme include residential areas immediately adjacent to the carriageway? Does the location of the scheme include particular relevant trip attractors in close proximity to the carriageway? Does the scheme include sections of road used as an alternative to motorway travel? Does the location of the scheme incorporate public transport usage? all and Urban Areas Is the scheme located primarily in a rural area, an urban area or combination of both? Rural areas	Rural Yes	C C C C Urban C	Both	There are a number of residential areas both rural and urban adjacent to the existing route. Urban areas include Penrith, and rural areas include Temple Sowerby, Cross End, Crackenthrope, Appleby-in-Westmorland, Warcop, Brough, Bowes, Greata Bridge. Wetheriggs Country Park at Penrith, Appleby Horse Fair at Appleby-in-Westmorland, Brough Hill Fair at Warcop and Wetheriggs animal rescue at Greta Bridge	
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Step 3: Considering scheme design

MOTT MACDONALD

		ering scheme design				
VOLUMB !	N.C					
otwa	ys					
①	3.1	Will the scheme involve changes to footways (e.g. width)?	Yes	No C	Unknown	In the urban areas i.e. at the M6J40 junction, Kemplay Bank
①	3.2	Will the scheme involve changes to kerbs (e.g. height)?	•	O	C	roundabout and the A1(M) scotch corner junction, the toucan
①	3.3	Will the scheme involve changes to footway gradient and level?	•	C	C	crossings will have tactile paving and tactile cones for partially sighted users. Gradients will be such that wheelchair users
①	3.4	Will the scheme involve use of tactile paving?	•	O	c	can use crossings and the paths at those junctions. However,
(i)	3.5	Will the scheme permanently affect access to footways?	•	O	c	in the rural areas, it is likely that the paths will not cater
①	3.6	Does the scheme provide an opportunity to enhance the pedestrian environment?	•	C	C	directly for wheelchair or partially sighted users, and will be more in keeping with the existing public rights of way. Across
①	3.7	Are specific accessibility measures being included as part of the design? (please specify)	•	C	C	the project, pedestrian facilities that are severed by the
U	3.7	The opening measures as part of the design (presses opening)				scheme shall he reconnected via grade-senarated crossings
ssin	gs, foot	bridges and underpasses				
			Yes	No	Unknown	
①	3.8	Will the scheme result in changes to traffic levels or speed?	•	0	C	The purpose of the scheme is to provide a strategic route and increase speed from 60mph or lower to 70mph. Across the
	3.9	Will the scheme change the number of crossings available?	•	C	C	project, pedestrian facilities that are severed by the scheme
	3.10	Will the scheme change the means by which people cross?	•	0	C	shall be reconnected via grade-separated crossings. Existing at
	3.11	Will the scheme affect identified pedestrian desire lines or existing crossing routes?	•	0	0	grade crossings shall be replaced with grade-separated crossings which means that vulnerable road users are
1	3.12	Does the scheme involve the addition or removal of footbridges?	•	0	0	removed from the dual carriageway environment, providing a
	3.13	Does the scheme involve the addition or removal of underpasses?	•	C	C	betterment for users. Measures to improve the accessibility of footbridges and underpasses will be undertaken at detailed
	3.14	Can measures be implemented to improve the accessibility of the footbridge/underpass?				design
eet f	urnitur	e and bollards				
			Yes	No	Unknown	
①	3.15	Will the scheme involve additional or changes to existing street furniture?	C	•	O	The A66 is a predominantely rural route so street furniture is
	3.16	Will the scheme affect the location of street furniture?	C	•	С	not affected.
	3.17	Can street furniture be combined as part of the design? (I.e. can lighting columns be set into	С	•	C	
①	3.18	grass verges? Can waste bins be combined with planters or seating?) Will the scheme involve the addition or removal of bollards?	C	œ	C	
U	2.10	will the scheme involve the addition of removal of boliards:				
is						
			Yes	No	Unknown	
①	3.19	Will the scheme impact upon the location of taxi ranks?	C	œ	C	There are no known taxi ranks along the A66.
	3.20	Will the scheme impact upon access to existing taxi ranks?	C	œ	C	
	3.21	If taxi ranks are relocated will they be situated at suitable drop off points near key services?	C	•	C	
rking						
			Yes	No	Unknown	
(i)	3.22	Will the scheme change the location or affect the provision of and access to on-street parking?	C	•	C	The A66 is a predominantely rural route so parking is not
U			C	•	C	affected.
	3.23	Will the scheme change the location or affect the provision of and access to disabled parking?				
	2 24			(C)	C	
	3.24	Will the scheme implement red routes, or other measures which prohibit disabled parking?				
			c	œ	C	
	3.24	Will the scheme implement red routes, or other measures which prohibit disabled parking? Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services?	o		C	
	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?	C		С	
vers a		Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services?	c		С	
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(i) alking	3.25 and gra 3.26 3.27 g distan 3.28 3.29 3.30 3.31 3.32 3.33 3.34 3.35	Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services? Will the scheme change the location of covers or gratings? Will the scheme involve the addition of covers and gratings? Will the scheme affect walking distances between key local destinations? Will the scheme change walking distance between residential areas and public services? Do proposed walking routes include rest points such as benches? Will the scheme change signed or natural / intuitive highways routes? Will the scheme change signed or 'natural' pedestrian routes? Will the scheme impact upon Public Rights of Way? Will the scheme change routes to key destinations? Will the scheme disrupt way-finding?	Yes	No o o o o o o o o o o o o o o o o o o	Unknown C C C C C C C C C C C C C C C C C C C	The A66 is a predominantely rural route so any changes to covers and gratings are unlikely to impact on users. The A66 is a predominantely rural route so walkers are likely to be predominantely recreational walkers rather than using footpaths to access services. The scheme includes new junctions and changing the route alignment which are likely to all imapct on natural intuative highway routes, pedestrian routes and navigation/wayfinding along Public Rights of Way.
(i) alking	3.25 and gra 3.26 3.27 g distan 3.28 3.29 3.30 3.31 3.32 3.33 3.34 3.35	Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services? It ings Will the scheme change the location of covers or gratings? Will the scheme involve the addition of covers and gratings? Will the scheme affect walking distances between key local destinations? Will the scheme change walking distance between residential areas and public services? Do proposed walking routes include rest points such as benches? Will the scheme change signed or natural / intuitive highways routes? Will the scheme impact upon Public Rights of Way? Will the scheme change routes to key destinations? Will the scheme disrupt way-finding? ity, surveillance and lighting Will the scheme change the location of street lighting?	Yes	No c c c c c c c c c c c c c c c c c c c	Unknown C C C C C C C C C C C C C C C C C C C	The A66 is a predominantely rural route so any changes to covers and gratings are unlikely to impact on users. The A66 is a predominantely rural route so walkers are likely to be predominantely recreational walkers rather than using footpaths to access services. The scheme includes new junctions and changing the route alignment which are likely to all imapct on natural intuative highway routes, pedestrian routes and navigation/wayfinding along Public Rights of Way.
i) alking inage rsona	3.25 and gra 3.26 3.27 g distan 3.28 3.29 3.30 3.31 3.32 3.33 3.34 3.35 al secur	Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services? It ings Will the scheme change the location of covers or gratings? Will the scheme involve the addition of covers and gratings? Will the scheme affect walking distances between key local destinations? Will the scheme change walking distance between residential areas and public services? Do proposed walking routes include rest points such as benches? Will the scheme change signed or natural / intuitive highways routes? Will the scheme impact upon Public Rights of Way? Will the scheme change routes to key destinations? Will the scheme disrupt way-finding? ity, surveillance and lighting Will the scheme change the location of street lighting? Will the scheme lead to additional pedestrian routes or new roads where lighting should be	Yes Yes Yes Yes	No c c c c c c c c c c c c c c c c c c c	Unknown C C C C C C C C C C C C C C C C C C C	The A66 is a predominantely rural route so any changes to covers and gratings are unlikely to impact on users. The A66 is a predominantely rural route so walkers are likely to be predominantely recreational walkers rather than using footpaths to access services. The scheme includes new junctions and changing the route alignment which are likely to all imapct on natural intuative highway routes, pedestrian routes and navigation/wayfinding along Public Rights of Way.
i) alking inage inage	3.25 and gra 3.26 3.27 3.38 3.29 3.30 3.31 3.32 3.33 3.34 3.35 al secur 3.36 3.37	Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services? It ings Will the scheme change the location of covers or gratings? Will the scheme involve the addition of covers and gratings? Will the scheme affect walking distances between key local destinations? Will the scheme change walking distance between residential areas and public services? Do proposed walking routes include rest points such as benches? Will the scheme change signed or natural / intuitive highways routes? Will the scheme impact upon Public Rights of Way? Will the scheme change routes to key destinations? Will the scheme disrupt way-finding? ity, surveillance and lighting Will the scheme change the location of street lighting?	Yes Yes Yes Yes Yes	No c c c No c c c c No c c c c c c c c c	Unknown C C C C Unknown C C C C C Unknown	The A66 is a predominantely rural route so any changes to covers and gratings are unlikely to impact on users. The A66 is a predominantely rural route so walkers are likely to be predominantely recreational walkers rather than using footpaths to access services. The scheme includes new junctions and changing the route alignment which are likely to all imapct on natural intuative highway routes, pedestrian routes and navigation/wayfinding along Public Rights of Way.
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i) nage i) rsona i)	3.25 and gra 3.26 3.27 3.38 3.29 3.30 3.31 3.32 3.33 3.34 3.35 al secur 3.36 3.37	Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services? Itings Will the scheme change the location of covers or gratings? Will the scheme involve the addition of covers and gratings? Will the scheme affect walking distances between key local destinations? Will the scheme change walking distance between residential areas and public services? Do proposed walking routes include rest points such as benches? Will the scheme change signed or natural / intuitive highways routes? Will the scheme impact upon Public Rights of Way? Will the scheme disrupt way-finding? ity, surveillance and lighting Will the scheme change the location of street lighting? Will the scheme lead to additional pedestrian routes or new roads where lighting should be considered? Does the scheme include provision for other personal security measures such as CCTV?	Yes Yes Yes Yes Yes	No c c c No c c c c c c c c c c c c c c	Unknown C C C C Unknown C C C C C C C C C C C C C C C C C C C	The A66 is a predominantely rural route so any changes to covers and gratings are unlikely to impact on users. The A66 is a predominantely rural route so walkers are likely to be predominantely recreational walkers rather than using footpaths to access services. The scheme includes new junctions and changing the route alignment which are likely to all imapct on natural intuative highway routes, pedestrian routes and navigation/wayfinding along Public Rights of Way.
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i) alking i) rsona i)	3.25 and gra 3.26 3.27 g distan 3.28 3.29 3.30 3.31 3.32 3.33 3.34 3.35 al secur 3.36 3.37 3.38	Will the scheme affect parking in destinations where disabled people may disproportionately use services – for example at hospitals or clinics providing outpatient services? Itings Will the scheme change the location of covers or gratings? Will the scheme involve the addition of covers and gratings? Will the scheme affect walking distances between key local destinations? Will the scheme change walking distance between residential areas and public services? Do proposed walking routes include rest points such as benches? Will the scheme change signed or natural / intuitive highways routes? Will the scheme impact upon Public Rights of Way? Will the scheme disrupt way-finding? ity, surveillance and lighting Will the scheme change the location of street lighting? Will the scheme lead to additional pedestrian routes or new roads where lighting should be considered? Does the scheme include provision for other personal security measures such as CCTV?	Yes Yes Yes Yes C	No c c c c c c c c c c c c c c c c c c c	Unknown C C C C C C C C C C C C C C C C C C C	The A66 is a predominantely rural route so any changes to covers and gratings are unlikely to impact on users. The A66 is a predominantely rural route so walkers are likely to be predominantely recreational walkers rather than using footpaths to access services. The scheme includes new junctions and changing the route alignment which are likely to all imapct on natural intuative highway routes, pedestrian routes and navigation/wayfinding along Public Rights of Way. Lighting should be considered on new underpasses.

3.41 Will the scheme affect the accessibility of stops, stations or other public transport facilities?
3.42 Will the scheme impact upon existing interchange facilities?
3.43 Are measures proposed to enhance and support personal security?

Step 3 Score:

64%

High scoring areas:
Footways
Low scoring areas:
Street furniture and bollards, Taxis, Parking, Covers and gratings, Walking distances

Step 3 is complete, click here to proceed to Step 4

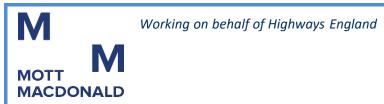
Working on behalf of Highways England

highways england

EDIT - Equality, Diversity and Inclusion Tool

Step 4: Capturing additional evidence

			Yes	No	Unknown		Yes	No	Unknow
①	4.1	Have consultation or other public or stakeholder engagement activities been undertaken as part of scheme development, options appraisal or similar?	e	C	C	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	•	C	C
①	4.2	Has an Equality Impact Assessment (EqIA) or other form of Equality Analysis been undertaken?	·	C	C	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	•	C	C
①	4.3	Have Social and Distributional Impact Appraisals been undertaken in accordance with WebTAG Units A4.1 and A4.2?	ē	C	C	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	•	C	C
①	4.4	Has a Health Impact Assessment (HIA) been undertaken?	•	C	C	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	•	O	C
①	4.5	Has a Non-motorised User (NMU) audit been undertaken?	•	C	C	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	C	•	C
①	4.6	Has an Environmental Statement been prepared, or an Environmental Impact Assessment (EIA) been undertaken?	٠	C	C	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	•	C	C
①	4.7	Has a Strategic Environmental Assessment (SEA) been undertaken?	C	©.	C	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	G	O	6
①	4.8	Has a Sustainability Appraisal been completed?	0	•	C	Has this process resulted in findings relevant to equality, diversity or inclusion issues?	G	C	•
		Journey quality. In terms of the distributional impacts of the proefficiency, Noise, Accidents, Affordability, Air quality. HIA has be NMU audit obsolete and now a 'Walking, Cycling, Horse-riding issues/findings identified.	oject, in ac een under	ccordance taken as	e with TAG A	owing were assessed: Safety (road accidents), Severance, Physical activity, A4.2 (May 2020), the following were assessed: Road user economic population and heath chapter in the Environmental Statement report. Istead, review report for Stage 3 being undertaken - no specific EqIA			
		Journey quality. In terms of the distributional impacts of the pro- efficiency, Noise, Accidents, Affordability, Air quality. HIA has be NMU audit obsolete and now a 'Walking, Cycling, Horse-riding a issues/findings identified.	oject, in ac een under Assessmen	ccordance taken as nt Report	e with TAG A part of the p ' (WCHAR in	A4.2 (May 2020), the following were assessed: Road user economic population and heath chapter in the Environmental Statement report. Istead, review report for Stage 3 being undertaken - no specific EqIA	Yes	No	
levan	t activ	Journey quality. In terms of the distributional impacts of the proefficiency, Noise, Accidents, Affordability, Air quality. HIA has be NMU audit obsolete and now a 'Walking, Cycling, Horse-riding issues/findings identified.	oject, in ac een under Assessmen	ccordance taken as nt Report	e with TAG A part of the p ' (WCHAR in	A4.2 (May 2020), the following were assessed: Road user economic population and heath chapter in the Environmental Statement report. Istead, review report for Stage 3 being undertaken - no specific EqIA	Yes	No C	Unknov
		Journey quality. In terms of the distributional impacts of the pro- efficiency, Noise, Accidents, Affordability, Air quality. HIA has be NMU audit obsolete and now a 'Walking, Cycling, Horse-riding of issues/findings identified. ity being undertaken by other bodies locally Is any other highways work being undertaken in the local area (oject, in ac een under Assessmen for examp	taken as nt Report	e with TAG A part of the p ' (WCHAR in	A4.2 (May 2020), the following were assessed: Road user economic population and heath chapter in the Environmental Statement report. Istead, review report for Stage 3 being undertaken - no specific EqIA		_	Unknov
		Journey quality. In terms of the distributional impacts of the proefficiency, Noise, Accidents, Affordability, Air quality. HIA has be NMU audit obsolete and now a 'Walking, Cycling, Horse-riding a issues/findings identified. ity being undertaken by other bodies locally Is any other highways work being undertaken in the local area (The construction phase of the route is planned for 2024 so ther construction. These will be monitored via existing contacts with	een under Assessmen e will be n	ccordance taken as nt Report ole by the numerous 13 and 1	e with TAG A part of the p ' (WCHAR in ' local highwas s local and H 4 teams.	A4.2 (May 2020), the following were assessed: Road user economic population and heath chapter in the Environmental Statement report. Isstead, review report for Stage 3 being undertaken - no specific EqIA ways authority) that is relevant to the project? HE OD interventions on the A66 and surrounding area during the period to		_	Unknov
		Journey quality. In terms of the distributional impacts of the proefficiency, Noise, Accidents, Affordability, Air quality. HIA has be NMU audit obsolete and now a 'Walking, Cycling, Horse-riding issues/findings identified. The construction phase of the route is planned for 2024 so ther	een under Assessmen e will be n	ccordance taken as nt Report ole by the numerous 13 and 1	e with TAG A part of the p ' (WCHAR in ' local highwas s local and H 4 teams.	A4.2 (May 2020), the following were assessed: Road user economic population and heath chapter in the Environmental Statement report. Isstead, review report for Stage 3 being undertaken - no specific EqIA ways authority) that is relevant to the project? HE OD interventions on the A66 and surrounding area during the period to	e	C	C
	4.10	Journey quality. In terms of the distributional impacts of the proefficiency, Noise, Accidents, Affordability, Air quality. HIA has be NMU audit obsolete and now a 'Walking, Cycling, Horse-riding issues/findings identified. ity being undertaken by other bodies locally Is any other highways work being undertaken in the local area (The construction phase of the route is planned for 2024 so ther construction. These will be monitored via existing contacts with	een under Assessmen e will be n	ccordance taken as nt Report ole by the numerous 13 and 1	e with TAG A part of the part	A4.2 (May 2020), the following were assessed: Road user economic population and heath chapter in the Environmental Statement report. Isstead, review report for Stage 3 being undertaken - no specific EqIA ways authority) that is relevant to the project? HE OD interventions on the A66 and surrounding area during the period to	Yes	No	Unknov





Step 5: Understanding construction effects

		NOTE: This step may not yet be applicable if you are early on in the delivery of your project.			
			Yes	No	Unkno
①	5.1	Are there likely to be any specific construction effects?	•	6	C
	5.2	Will vehicular access routes be temporarily affected by construction of the scheme?	•	C	C
	5.3	Will footpaths, public rights of way, or access routes be temporarily impacted by construction?	•	C	C
	5.4	Will public transport routes be temporarily altered or service levels temporarily reduced by construction?	•	C	C
	5.5	Will any community facilities (such as educational or healthcare facilities) be impacted by construction?	•	C	C
	5.6	Will the full function of the facilities in question be impeded for any period during construction?	C	•	C
	5.7	Will use of the facilities be temporarily disrupted due to construction noise, additional traffic or other construction activities?	•	C	C
	5.8	Will access to facilities be disrupted? If so, for how long? And will alternative access be provided?	C	•	C
	5.9	Will there be temporary land take from community facilities as a result of construction?	•	C	C
		temporary closures and diversions. The full detail of impacts on NMUs and temporary diversions is not yet known. The construction of the proposed scheme is likely to impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities.			
stru	ction a	impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions,	Yes	No	Unkno
stru	ction a	impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities.		No C	Unkno
		impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities. assessment and management processes	Yes		
(i)	5.10	impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities. assessment and management processes Has a construction impact assessment been undertaken for the scheme?	Yes	C	O
① ①	5.10 5.11 5.12	impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities. assessment and management processes Has a construction impact assessment been undertaken for the scheme? Has a Code of Construction Practice (CoCP) been implemented for the scheme? Has a Construction Environmental Management Plan (CEMP) been implemented for the scheme?	Yes •	c c	c
① ①	5.10 5.11	impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities. Assessment and management processes Has a construction impact assessment been undertaken for the scheme? Has a Code of Construction Practice (CoCP) been implemented for the scheme?	Yes •	•	0
① ①	5.10 5.11 5.12	impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities. assessment and management processes Has a construction impact assessment been undertaken for the scheme? Has a Code of Construction Practice (CoCP) been implemented for the scheme? Has a Construction Environmental Management Plan (CEMP) been implemented for the scheme?	Yes •	c c	c c
① ①	5.10 5.11 5.12	impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities. **Assessment and management processes** Has a construction impact assessment been undertaken for the scheme? Has a Code of Construction Practice (CoCP) been implemented for the scheme? Has a Construction Environmental Management Plan (CEMP) been implemented for the scheme? Does the CoCP or CEMP identify any measures designed to manage effects relevant to EDI? The draft EMP is available and includes mitigation measures for dust, noise, Public Rights of Way, community engagement, skills and employment and construction	Yes •	c c	c c
① ①	5.10 5.11 5.12 5.13	impact on general vehicular routes including service bus routes and school bus services, this may include effects during construction as a result of route diversions, congestion, and delays. Delays and road diversions are likely to result in temporary disruption to community facilities. **Assessment and management processes** Has a construction impact assessment been undertaken for the scheme? Has a Code of Construction Practice (CoCP) been implemented for the scheme? Has a Construction Environmental Management Plan (CEMP) been implemented for the scheme? Does the CoCP or CEMP identify any measures designed to manage effects relevant to EDI? The draft EMP is available and includes mitigation measures for dust, noise, Public Rights of Way, community engagement, skills and employment and construction	Yes •	c c	c c

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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

49%

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:

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

Your response rate for this step was:

While you have answered more than 50% of questions on this sheet your score for this section may require 100% further scrutiny

Summary of:

Step 2: Information about the scheme

Step 2 score

Your score at step 2 is influenced by the following areas of positive response: Main effects of the scheme, Trunk A-Roads, Non-motorised user (NMU) impact

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

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

Your response rate for this step was:

While you have answered more than 50% of questions on this sheet your score for this section may require further scrutiny

Summary of:

Step 3: Scheme design elements for consideration

Step 3 score

64%

Your score at step 3 is influenced by the following areas of positive response:

Footways

Your score at step 3 is influenced by the following areas of negative response: Street furniture and bollards, Taxis, Parking, Covers and gratings, Walking distances i Insert any additional coments regarding this part of the assessment here:

Your response rate for this step was:

While you have answered more than 50% of questions on this sheet your score for this section may require

Summary of:

Step 4: Capturing additional information

Step 4 score

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:

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

Your response rate for this step was:

While you have answered more than 50% of questions on this sheet your score for this section may require further scrutiny

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:

i Insert any additional coments regarding this part of the

Your response rate for this step was:

While you have answered more than 50% of questions on this sheet your score for this section may require further scrutiny

assessment here:

OVERALL EDIT SCORE:

73%

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 an 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:		Project stage:	Date:	
Signed off by Senior Respo	nsible Owner:			
Name:		Job title:		
Name: Signature:		Job title: Date:		
Signature:	resentative (where applicat	Date:		



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.



MOTT

MACDONALD

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:

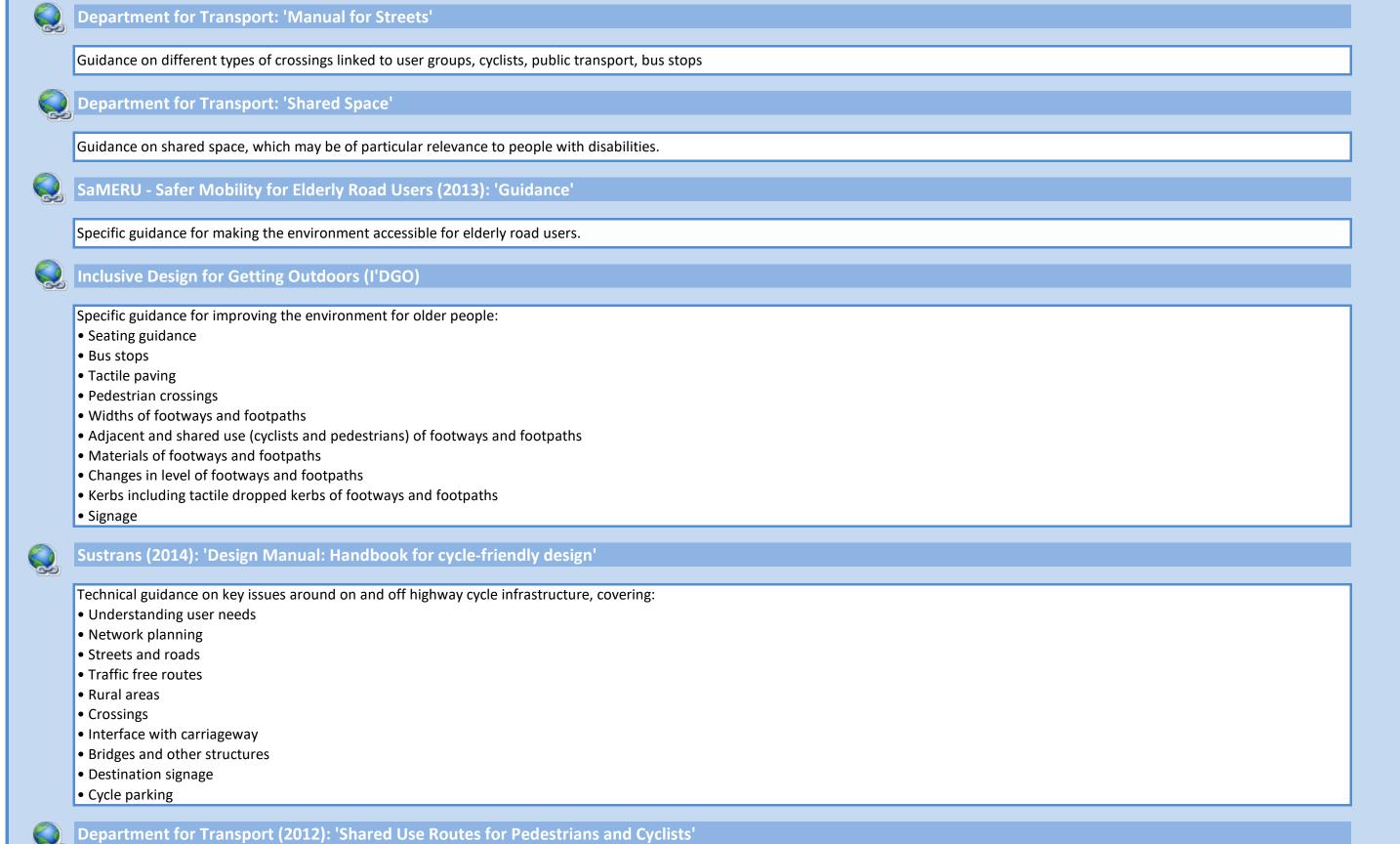
- Crossings
- General considerations (such as surfaces, signing and markings, lighting, drainage and manholes, street furniture, personal safety and security, maintenance and monitoring and other issues (bus stops, escape routes for disabled motorists, and service and picnic areas).



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



Guidance on

Site assessment

General design considerations

Detailed design issues