

# M5 Junction 10 Improvements Scheme

## Equality Impact Assessment

TR010063 - APP 7.6

Regulation 5 (2) (q)

Planning Act 2008

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



Volume 7  
October 2024

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# Infrastructure Planning Planning Act 2008

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

### M5 Junction 10 Improvements Scheme Development Consent Order 202[x]

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#### 7.6 Equality Impact Assessment (Clean)

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<b>Regulation Number:</b>	Regulation 5(2)(q)
<b>Planning Inspectorate Scheme Reference</b>	TR010063
<b>Application Document Reference</b>	TR010063/APP/7.6
<b>Author:</b>	M5 Junction 10 Improvements Scheme Project Team

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
Rev 0	December 2023	DCO Application
Rev 1	October 2024	Deadline 5

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## Glossary

Abbreviation	Term	Definition
AADT	Average Annual Daily Traffic	The total volume of vehicle traffic on a highway or road for a year, divided by 365 days.
AQMA	Air Quality Management Area	An area which is deemed unlikely to meet national air quality objectives without further intervention.
BAME	Black, Asian and Minority Ethnic	The population who identifies as being of Black, Asian and Minority Ethnicity.
Bus lane		Bus lanes are separate to other lanes for general traffic on a highway, to provide a priority for buses. Their boundaries are marked with a solid white line, and the words 'bus lane' are painted on the ground along the bus lane. Signs are placed on the approach to the bus lane to provide motorists enough warning to change lane as appropriate.
Bus gate		A bus gate is a short length of bus only road, which itself is a section of road that only allows a bus to pass (with exceptions).
DCO	Development Consent Order	The consent for the construction, operation and maintenance of Nationally Significant Infrastructure Projects (NSIP) given by the relevant Secretary of State on the recommendation of the Planning Inspectorate under the Planning Act 2008 (as amended).
DCO Limits	Development Consent Order Limits	The limits described as the DCO boundary on the works plan within which the authorised development may be carried out. This is also referred to as the Red Line Boundary in the consultation documents.
DLA	Disability Living Allowance	A monthly, tax-free payment which is designed to help with the extra costs for additional care or mobility needs as a result of a disability.
DRS	Due Regard Statement	A statement which uses the evidence presented in the EqIA to summarise how due regard is paid to the three aims of public sector equality duty:

Abbreviation	Term	Definition
		<ul style="list-style-type: none"> <li>• Eliminate discrimination, harassment and victimisation and any other conduct prohibited by the Equality Act 2010</li> <li>• Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and</li> <li>• Foster good relations between people who share a protected characteristic.</li> </ul>
EDIT	Equality, Diversity and Inclusion sifting Tool	National Highways tool used to complete an Equality Impact Assessment.
EqlA	Equality Impact Assessment	An assessment of whether a policy, project or scheme unlawfully discriminates against a protected characteristic group, as designated under the Equality Act (2010).
GCC	Gloucestershire County Council	Gloucestershire County Council is a statutory consultee for the Scheme, as defined under section 42(1)(b) and section 43(c) of the Planning Act 2008 ("the Act"). Gloucestershire County Council is the local highway authority in Gloucestershire and is the Minerals and Waste Planning Authority (MWPA) for Gloucestershire. Gloucestershire County Council also has statutory duties in relation to drainage, flood risk, and heritage assets and archaeology.
GFR	General Fertility Rate	The number of live births in a geographic area in a year per 1000 women of childbearing age.
HIF	Housing Infrastructure Fund	A government capital grant programme awarded to local authorities on a competitive basis, which will help deliver new homes in England.
Local Area		The area surrounding the Scheme which is made up of the local authorities of Cheltenham, Gloucester and Tewkesbury.
LSOA	Lower Super Output Area	A standard geographical area with an average population of 1500 people or 650 households.
NINo	National Insurance Number	National Insurance Number allocations to adult overseas nationals entering the UK. Sometimes referred to as 'National Insurance registrations'.

Abbreviation	Term	Definition
NH	National Highways	National Highways (formerly known as Highways England) is the government-owned company charged with operating, maintaining and improving England's motorways and major A roads.
PCF	Project Control Framework	A joint Department for Transport and National Highways approach to managing major projects.
PCG	Protected Group Characteristics	Social groups defined as per the Equality Act 2010. The groups are age, disability, gender reassignment, pregnancy and maternity, race, religion, sex, sexual orientation, marriage and civil partnership.
PRA	Preferred route announcement	The PRA was released on 16 June 2021 and set out the chosen options for the M5 Junction 10 Improvements Scheme to progress through Stage 3 of the PCF.
The Applicant	The Applicant or Applicant's project team	Gloucestershire County Council (Strategic Development team) applying for the DCO.
TFR	Total Fertility Rate	The sum of the age-specific fertility rates for all women, multiplied by five for each of the seven five-year age groups from 15-19 to 45-49.
WCH	Walking, Cycling and Horse-riding	Walkers, cyclists and horse riders (WCH) formerly known as non-motorised users (NMUs).

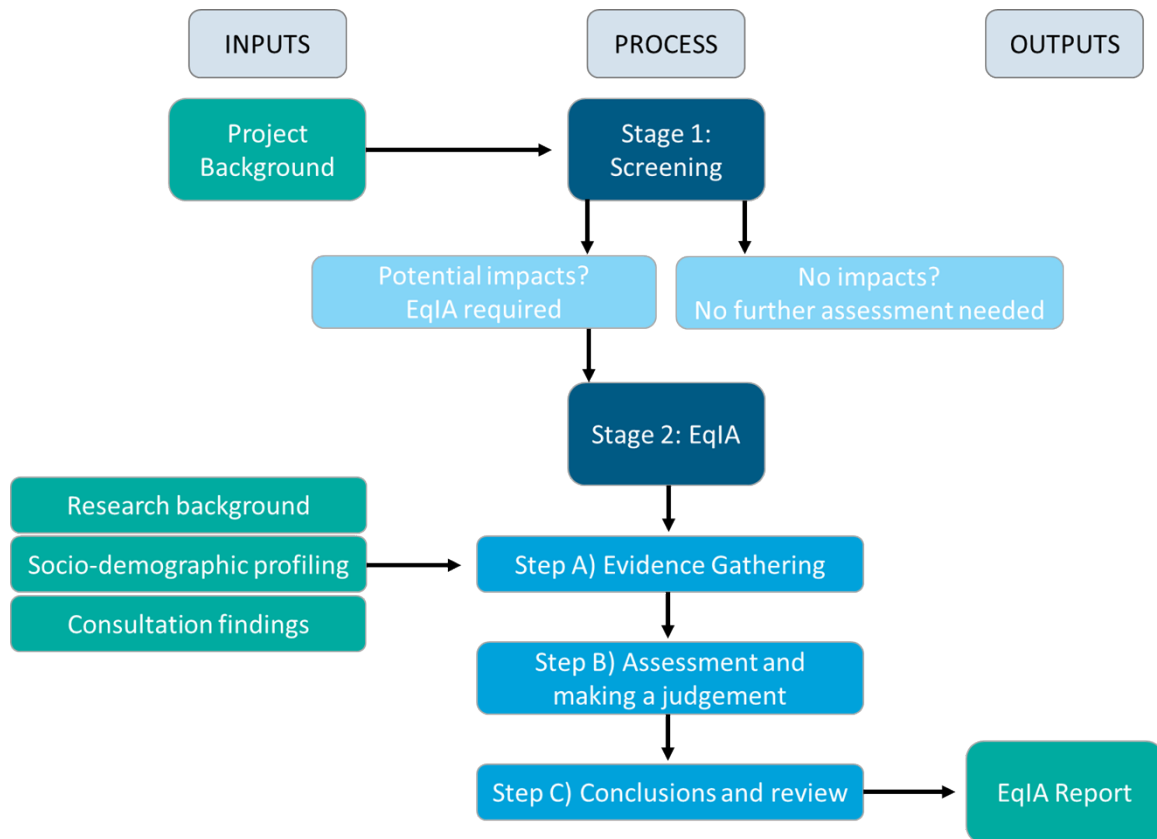


# 1. Introduction

## 1.1. Equality Impact Assessment

- 1.1.1. An Equality Impact Assessment (EqIA) is an assessment of the likelihood or actual effects of policies or proposals on social groups as defined in the Equality Act 2010. These groups known as Protected Characteristic Groups (PCG) are: Age, Disability, Gender Reassignment, Pregnancy and Maternity, Race, Religion, Sex, Sexual Orientation, Marriage and Civil Partnership.
- 1.1.2. An EqIA is used to inform the Scheme design, so that identified negative impacts can be mitigated as much as possible, and any opportunities for furthering equality aims are taken. As set out in the Equality Act 2010, the public sector equality duty states that a public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 1.1.3. This EqIA will remain live throughout the M5 Junction 10 Improvements Scheme (the Scheme). Having been approved by the Planning Inspectorate as meeting the standards required to be accepted for examination, Scheme has now been through the Pre-examination stage of the process and is currently in the Examination stage. This update (September 2024) is to ensure the most current datasets and accompanying maps are being used in the assessment. This EqIA therefore focuses on impacts the Scheme may have on road users, staff, stakeholders and PCGs.
- 1.1.4. As the Scheme is located on the strategic road network, this EqIA has been produced using National Highways guidance and best practice.
- 1.1.5. The EqIA will be reviewed and updated as the Scheme progresses, in line with any design changes, phases of work and new information relevant to the EqIA, such as any additional consultation if required, to ensure all impacts are captured, mitigated and monitored accordingly.

Figure 1-1 - EqlA Process



1.1.6. Figure 1-1 shows the inputs, processes, and outputs of the EqlA

## 1.2. Gloucestershire County Council and National Highways' Roles

1.2.1. The Scheme sits within Gloucestershire County, however, the involvement of a National Highways (NH) asset (M5) means that the Applicant is working closely with National Highways and are seeking support throughout the Scheme's progression.

1.2.2. As a result, the Scheme's programme aligns closely with National Highways' Major Projects Project Control Framework (PCF). Where appropriate, PCF products will be delivered as part of this including this EqlA.

1.2.3. National Highways accompany their EqlA's with an Equality, Diversity and Inclusion sifting Tool (EDIT). The information gathered in the EDIT can then be used to complete the EqlA and forms the basis of evidence for equality in the Scheme design process. An initial EDIT was completed and updated at each stage of the Scheme.

## 1.3. M5 Junction 10 Improvements Scheme

### Context

1.3.1. Gloucestershire faces significant challenges to achieve its vision for economic growth. An adopted Joint Core Strategy (JCS) – a partnership between Gloucester City Council, Cheltenham Borough Council (CBC) and Tewkesbury Borough Council (TBC) - has been formed to produce a co-ordinated strategic development plan to show how the

region will develop during the period 2011 - 2031. This includes a shared spatial vision targeting 35,175 new homes and 39,500 new jobs by 2031.

- 1.3.2. Major development of new housing (c.9,000 homes) and employment land is proposed in the JCS in strategic and safeguarded allocations to the west and north-west of Cheltenham, much of which lies within TBC's boundary as the Local Planning Authority. This development, in turn, is linked to wider economic investment, including a government supported and nationally significant cyber business park (Cyber Central UK) adjacent to the Government Communications Headquarters (GCHQ) site in the west Cheltenham, as part of the West Cheltenham development site.
- 1.3.3. The existing M5 Junction 10 only provides access and egress to and from the north, with no connectivity to M5 south; this causes existing traffic to cross Cheltenham through various routes to access and leave the M5 from the south using other M5 junctions. This contributes significantly to existing traffic flows across Cheltenham, with significant congestion at peak times. To unlock the housing and job opportunities, a highway network is needed that has the capacity to accommodate the increased traffic it will generate, within a sustainable transport context.
- 1.3.4. Upgrading M5 Junction 10 to an all-movements junction has been identified as a key infrastructure requirement to enable the housing and economic development proposed by the Gloucestershire Local Enterprise Partnership's (GFirst LEP) Strategic Economic Plan and is central to the transport network sought by the Applicant in the adopted Gloucestershire Local Transport Plan. This planned housing and economic growth have been included in the adopted JCS. Alterations to M5 J10 are critical to maintaining the safe and efficient operation of the junction; and enabling the planned development and economic growth around Cheltenham, Gloucester and Tewkesbury. A bid was submitted in March 2019 to Homes England to the Housing Infrastructure Fund (HIF), wherein an investment case was made for the following infrastructure alterations. Funding was successfully awarded by Homes England in March 2020 for the Scheme's three elements: alteration to M5 Junction 10, new West of Cheltenham Link Road from A4019 to B4634 and widening the A4019.
- 1.3.5. An application for a Development Consent Order (DCO) under Section 22 of the Planning Act 2008 has been submitted for the construction of alteration works to M5 Junction 10, consisting of a new all-movements junction; the widening of the A4019 east of the junction to the Gallagher Retail Park Junction; and a new West Cheltenham Link Road (the Link Road from the A4019 to the B4634). A small section of the A4019 will also be widened to the west of the junction.
- 1.3.6. A series of documentation has been produced as part of the DCO application, including an Environmental Statement (Application document TR010063 – APP 6.2).
- 1.3.7. The Scheme includes three main elements:
- An all-movements junction at M5 Junction 10.
  - A new West Cheltenham Link Road east of Junction 10 from the A4019 to the B4634.
  - Widening of the A4019 to the east of Junction 10.

## 1.4. M5 Junction 10

- 1.4.1. The proposed improvements to M5 Junction 10 are to increase the capacity of the junction, and to upgrade the current restricted movements junction to an all-movements junction. To enable travel both south and north on the M5, the two existing Junction 10 slip roads will be removed, and four new slip roads will be constructed to provide access and egress to the M5 in all directions.

- 1.4.2. Two new overbridges (Piffs Elm Interchange Bridge North and Piffs Elm Interchange Bridge South) will be constructed over the M5, centred either side of the existing Piffs Elm Interchange Bridge (carrying the A4019 over the M5), which will then be demolished. The new overbridges will create a new elongated roundabout junction over the M5. Both bridges will be a single span steel composite multi girder bridge construction with a diaphragm connected to sleeved column foundations, and with reinforced earth wingwalls. The single span avoids a requirement for a support pillar in the central reservation.
- Piffs Elm Interchange Bridge North - incorporates the cycleway and footway along the north side of the bridge.
  - Piffs Elm Interchange Bridge South - the south bridge is narrower as it does not have the cycleway and footway that is included as part of the north bridge.
- 1.4.3. The A4019 will be realigned to provide an appropriate entry angle to the new roundabout. A dedicated route for cyclists and pedestrians will be provided at grade through the junction.
- 1.4.4. A new access track will be created to the northeast of the M5 Junction 10, as a replacement for the existing access points to the field areas and the informal Traveller site, that have been lost as a result of the new southbound off-slip.
- 1.4.5. Public footpath ABO14, that is located to the west of the M5 and south of the A4019, will be rerouted via the access track from the attenuation basin number 3 to intersect with the A4019 at a point just west of the junction of Stanboro Lane and the A4019.
- 1.4.6. The public footpath through the River Chelt culvert will be retained as part of the completed Scheme.
- 1.4.7. An underpass (the 'Withybridge (A4019) underpass') will be constructed under the A4019 immediately to the east of Junction 10 to provide a traffic free route for bats to cross under the A4019, as well as pedestrians, cyclists and equestrians. Physical measures will be in place to prevent vehicular access through the underpass. The underpass will be lit during the day, with the lights switched off between sunset and sunrise.
- 1.4.8. Works to install signage and technology equipment will be undertaken along the M5 to the north and south of Junction 10. The exact locations of these works will be determined at detailed design.

## 1.5. West Cheltenham Link Road

- 1.5.1. The Link Road element of the Scheme comprises a new single carriageway 1.4km in length, between the B4634 to the A4019, designed to provide greater connectivity between the reconfigured M5 Junction 10 and the West Cheltenham Development Area. The Link Road has a segregated cycleway (3m in width) and footway (2m in width) all the way along its west side. The speed limit on the Link Road will be 50mph, reducing to 40mph at the junction with the B4634.
- 1.5.2. The clearance underneath the bridge, and the space between the riverbank and bridge abutments will also allow access for small vehicles and livestock along either riverbank at this point, as well as the public rights of way (PRoW) described below.
- 1.5.3. There are two existing PRoWs running east/west across the line of the Link Road:
- The line of the PRoW that runs to the south of the River Chelt will not be affected by the Scheme, with the PRoW crossing underneath the River Chelt bridge along the south side (left bank) of the river.

- The PRoW running to the north of the River Chelt will be realigned at the point where its alignment crosses the Link Road, so that it crosses under the River Chelt bridge along the north side (right bank) of the river.
- 1.5.4. Two new junctions will connect the Link Road with the existing A4019 (to the north) and the B4634 (to the south):
- A4019 - a four-arm signalised junction with the northern arm ultimately providing access to the proposed developments to the north of the A4019, as safeguarded in the Joint Core Strategy (JCS). Within the design of the Scheme, the northern arm provides for field access and the informal Traveller site only. The design of this northern arm to enable access into the safeguarded land will be undertaken by the relevant developer. Pedestrian and cycle access over this junction will be incorporated into the signal phasing for this junction.
  - B4634 - a new four arm signalised junction on the B4634 to connect the proposed West Cheltenham Development Area to the M5 Junction 10 via the Link Road and the A4019.
- 1.5.5. Street lighting along the Link Road will be limited to the two new junctions and the sections of the Link Road adjacent to the junctions.
- 1.5.6. New field access routes off the Link Road will be included in the Scheme as replacements for the existing access points that have been lost as a result of the creation of the Link Road.
- 1.5.7. At the southern end of Link Road, the Scheme extends east and west along the B4634 either side of the new junction (with the Link Road). The speed limit on the section of the B4634 within the Scheme will be 40mph.
- To the west of the junction, the Scheme will provide a parallel cycle and pedestrian crossing of the B4634, incorporated into the signalised junction, to allow the future continuation of the proposed cycling and pedestrian route into the West Cheltenham Development Area.
  - The B4634 will be widened to the south of its existing alignment to allow for the provision of a 2m wide shared use path along the northern verge through to the junction of the B4634 and Withybridge Lane. This will provide a connection between the walking and cycling provision on the Link Road and Withybridge Lane.
  - From the new signalised junction with the Link Road, the B4634 will continue westwards as a 7.3m wide single carriageway and tie into the existing B4634 at its junction with Withybridge Lane.
  - To the east of the new signalised junction, the B4634 will also be widened to the south of the existing road.

## 1.6. A4019 Tewkesbury Road Widening

- 1.6.1. The A4019 links the M5 Junction 10 to north-west Cheltenham. Currently, the A4019 is a dual carriageway over the M5 Junction, returning to single carriageway east of the junction to serve the turning into Withybridge Lane. The A4019 continues eastwards to Cheltenham as a single carriageway, where it ties into an existing dual carriageway at the Gallagher Retail Park.
- 1.6.2. The section of the A4019 covered by the Scheme runs from just west of the M5 Junction 10 (at the junction of Stoke Road and the A4019) eastwards through to the existing dual carriageway at the Gallagher Retail Park (finishing just east of the junction of the B4634 and A4019).

- 1.6.3. As part of the highway improvements incorporated into the Scheme, the A4019 will be widened to a two-lane dual carriageway from Withybridge Lane, eastwards through to the Gallagher Retail Park, where the Scheme will tie into the existing dual carriageway. Widening of the A4019 through Uckington will be predominantly to the southern side of the A4019. Widening to the east and the west of Uckington will be to the northern side of the A4019. To the west of Junction 10 the existing section of two-lane dual carriageway will be replaced with single lanes.
- 1.6.4. The following changes will be made to the existing junctions on the A4019, alongside the creation of three new junctions. For residents and businesses whose current access is directly onto the A4019 (for example those in Uckington, and along the southern side of the A4019 in north-west Cheltenham), short sections of new access roads will be created alongside the widened A4019 to facilitate ease of access both westbound and eastbound and will join the A4019 at signalised junctions.
- Stoke Road – no change made to the existing junction.
  - Stanboro Lane – existing junction location retained, with minor changes made to the mouth of the junction. Left and right turning from the junction retained.
  - Withybridge Lane – existing junction location retained, but access changed to left turn into Withybridge Lane, and left turn only out onto the A4019.
  - Cooks Lane – existing junction closed, with access from Cooks Lane to the A4019 diverted through to the Link Road via a new access road.
  - The Green and Moat Lane – modified to form a single signalised crossroads.
  - West Cheltenham Fire Station – access for emergency vehicles retained with left and right turning onto the A4019. Access for non-emergency vehicles diverted onto a new access road and joining the A4019 at a new junction (referred to as Site Access B).
  - Homecroft Drive and Sandpiper Drive - existing junctions closed, with access to the A4019 diverted through to the Site Access B junction via a new access road.
  - Civil Service Sports Ground – existing junction location retained but changed to a signalised crossroads (the Site Access B junction). For traffic westbound on the A4019, the right turn at this junction will be for buses only.
  - B4634 (Hayden Road) – the Gallagher Junction. Existing junction location retained, but with the layout changed. This will become the Site Access C junction into the proposed North-west Cheltenham Development site.
- 1.6.5. Three new junctions will be created to provide access into the proposed North-west Cheltenham Development site:
- A slip lane – opposite the West Cheltenham Fire Station for eastbound traffic on the A4019 into the North-west Cheltenham Development site.
  - Site Access A – a signalised T-junction opposite Homecroft Drive.
  - Site Access B – a signalised crossroads incorporating the existing access from the Civil Service Sports Ground. The new access road from the West Cheltenham Fire Station, Homecroft Drive and Sandpiper Drive will feed into the southern arm of this junction.
- 1.6.6. Street lighting will extend for most of the length of the A4019 within the Scheme boundary. The exceptions will be a section to the east and the west of Uckington where there will be no street lighting so as to provide mitigation for bats.
- 1.6.7. A speed limit along the A4019 of 50mph is proposed from the western extent of the Scheme through to a point west of Uckington between the junction with the new Link Road and Cooks Lane, where the speed limit will be reduced to 40mph through to the Gallagher junction.

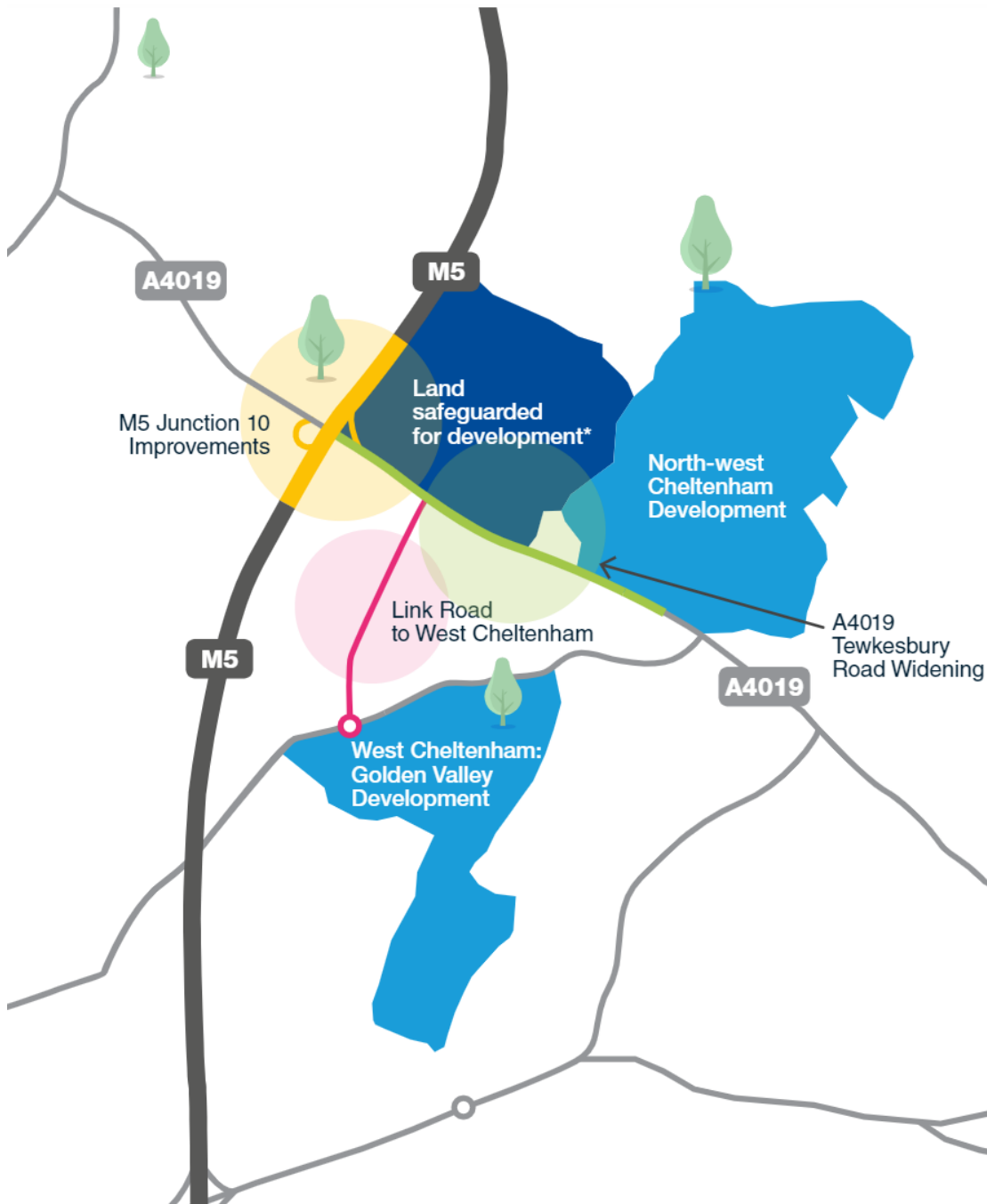


- 1.6.8. The Scheme will include a segregated cycleway (3m width) and footway (2m width) on the northern side of the A4019, which with the exception of a short section of shared use path through Uckington will extend from the junction of the A4019 with Stanboro Lane in the west through to the Gallagher junction at the eastern end of the Scheme. This active travel corridor will provide connectivity for pedestrians and cyclists between north-west Cheltenham and the junction of the A4019 and Stanboro Lane (west of M5 Junction 10). It will tie into an existing shared use path at the eastern end of the Scheme, and an existing footway at the western end.
- 1.6.9. Space for the inclusion of bus gates was included in the preliminary design through the inclusion of oversized islands at the Site Access A and Site Access B junctions eastbound from the A4019. In addition, space for a bus lane was included in the design.
- 1.6.10. Following further consultation and design development, the bus lane and bus gate are now included in the design. This comprises a 4.0m wide bus lane on the A4019 eastbound carriageway from Cheltenham West Community Fire and Rescue Station to Gallagher Junction, running for a total length of approximately 675m, including three proposed signalised bus gates where it passes by the North West Cheltenham (Elms Park) Allocated Site and Gallagher junction. There will also be one eastbound bus stop sited within the bus lane.

## 1.7. Scheme Objectives

- 1.7.1. The objectives of the Scheme are to:
1. Support economic growth and facilitate growth in jobs and housing by providing improved transport network connections in West and North-West Cheltenham.
  2. Enhance the transport network in the West and North-West of Cheltenham area with the resilience to meet current and future needs.
  3. Improve the connectivity between the Strategic Road Network (SRN) and the local transport network in West and North-West Cheltenham.
  4. Deliver a package of measures which is in keeping with the local environment, establishes biodiversity net gain and meets climate change requirements.
  5. Provide safe access to services for the local community and including for users of sustainable transport modes within and to West and North-West Cheltenham.
- 1.7.2. Figure 1-2 illustrates the location and elements of the Scheme, in relation to the local developments.

Figure 1-2 - Location of M5 Junction 10 Improvements Scheme Elements



## 1.8. Road users, Staff and Stakeholders

1.8.1. The road users, staff and stakeholders involved or affected by the Scheme include:

- **Road users**

- Road users along the route, as well as all road users on local roads experiencing impacts as a result of the Scheme during both construction and operation (i.e. where traffic is redistributed from/across local roads). Impacts arising on local



roads, and to public transport and Walking, Cycling and Horse-riding (WCH) routes may also affect residents, pedestrians and cyclists and access to local community facilities.

- **Staff**

- Staff involved in construction and management of the Scheme. This includes operatives working on the Scheme, support staff and enabling function roles. This scheme presents a considerable employment opportunity in the area and can be used to maximise the social value of the Scheme.

- **Stakeholders**

- Includes local authorities, public services, groups with land directly and indirectly impacted by the Scheme, and local community facilities impacted by the Scheme.

1.8.2. Considering the relevant road users, staff and stakeholders, this EqlA focuses specifically on the PCGs as identified in Section 1. This EqlA seeks to identify any disproportionate impacts likely for these PCGs as a result of the Scheme and where appropriate, presents mitigation and monitoring actions to reduce this disproportionate impact.

## 1.9. Assessment Area

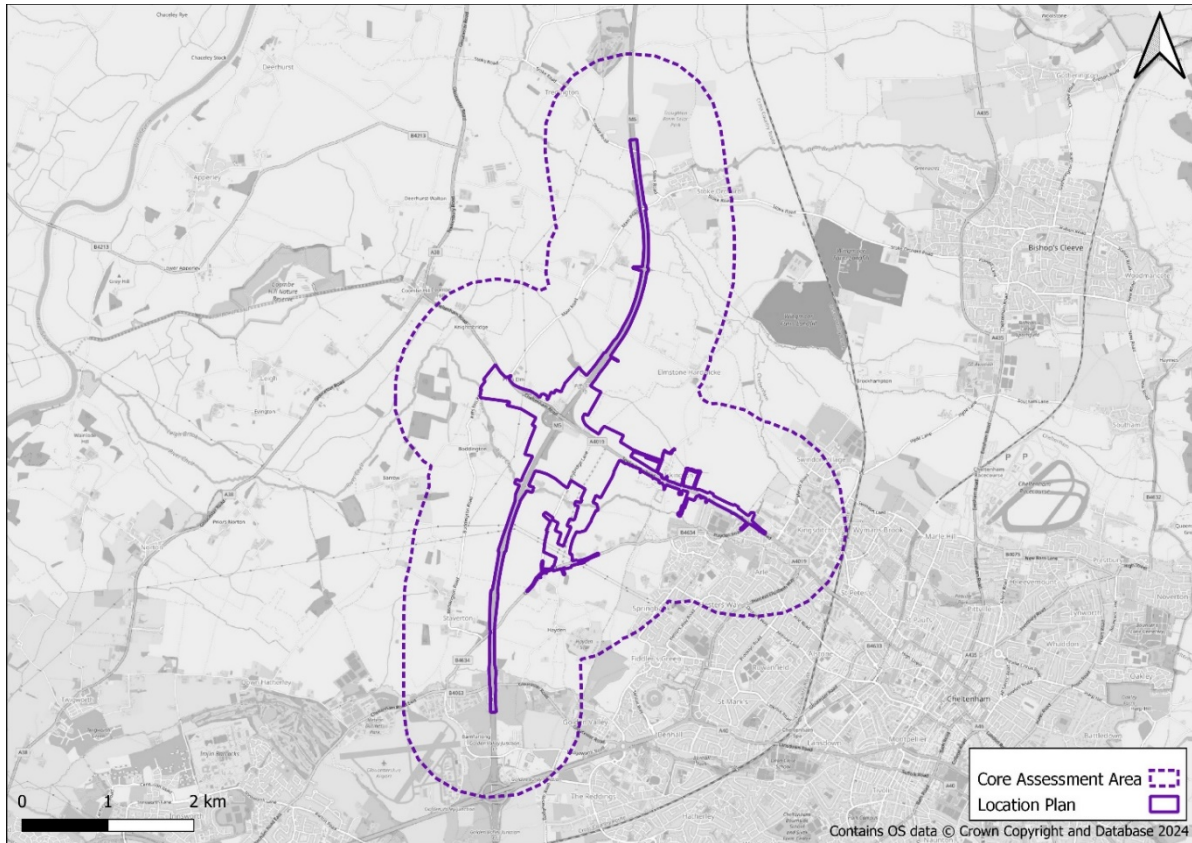
1.9.1. This EqlA will focus on a core assessment area (CAA) as this is where the majority of impacts will be experienced by road users and local communities who may be affected by additional traffic, construction impacts and environmental impacts.

1.9.2. The CAA boundary is a 1km radius of the Scheme alignment (Design Fix 3) which encompasses impacts that may be experienced further from the Scheme, such as changes to air quality, noise, and severance.

1.9.3. Using a 1km boundary for the CAA is best practice to capture the demographics of those living near the Scheme, who are most likely to be directly affected by changes to air, noise and traffic changes during both construction and operation. If the CAA was too large it would dilute the demographic statistics and the results would not be as accurate nor a fair representation of those who are most likely to be impacted by the Scheme. Whilst a 1km boundary has been used as the CAA, the Scheme is expected to produce wider impacts along other adjoining areas and roads, therefore this assessment is not limited to this area alone, and any wider impacts will be considered.

1.9.4. The CAA and the Scheme alignment are shown in Figure 1-3.

**Figure 1-3 - Scheme Alignment and Core Assessment Area**



## 2. Screening

2.1.1. This section presents the EqlA screening for the Scheme.

2.1.2. To meet the statutory duty under the Equality Act 2010, public bodies have a public sector equality duty requiring them to pay due regard to the PCGs. The EqlA screening asks a series of questions to guide the assessment and ensure all potential impacts on PCGs are considered. The questions in Table 2-1 are derived from the Government's EqlA guidance<sup>1</sup> and are used by National Highways to understand whether an EqlA is necessary, and if so which PCGs should be included.

**Table 2-1 - Screening: M5 Junction 10 Improvements Scheme**

Questions considered to establish impacts from the outset for new or changing policies or practices	Sex	Religion	Age	Disability	Race	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Marriage and Civil Partnerships
1: Is there any indication or evidence that different groups have different needs, experiences, issues or priorities in relation to the practice/policy?	Y	Y	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	N	N	N	N	N
3: Do people have different levels of access? Are there social or physical barriers to participation (e.g. language, format, physical access)?	Y	N	Y	Y	Y	N	N	Y	N
4: Is there an opportunity to advance equality or foster good relations by altering the policy/practice?	Y	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?	Y	Y	Y	Y	Y	N	N	Y	N
6: Is there stakeholder (staff, Trade Unions or public) concern about the policy/practice in terms of actual, perceived or potential discrimination against a particular group?	N	N	N	N	N	N	N	N	N

<sup>1</sup> <https://www.gov.uk/guidance/equality-act-2010-guidance>

Questions considered to establish impacts from the outset for new or changing policies or practices	Sex	Religion	Age	Disability	Race	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Marriage and Civil Partnerships
7: Is there potential for, or evidence that, any part of this policy/practice may adversely affect equality of opportunity for all or may harm good relations between different groups?	N	N	N	N	N	N	N	N	N
8: Is there any potential for, or evidence that any part of the policy/practice could discriminate indirectly or directly? (Consider those who implement it on a daily basis).	Y	Y	Y	Y	Y	N	N	Y	N

## 3. Evidence

3.1.1. This section provides the rationale behind the ratings given in Table 2-1 and details the evidence utilised to inform the screening decision.

### 3.2. Introduction

3.2.1. Information has been drawn together to inform the screening and ongoing EqlA including:

- Considerations of the Scheme.
- Socio-demographic profiling.
- Area background.
- Statutory consultation feedback.

3.2.2. The findings from this data gathering that are relevant to this EqlA are presented below, and key considerations for the EqlA summarised at the end of this section.

### 3.3. Scheme Considerations

3.3.1. The Scheme considerations are as follows:

1. Changes to access along the route and to local amenities.
2. Changes to access and usual travel routes as a result of construction – particularly for those with specific travel requirements.
3. Environmental impacts associated with construction (noise, air quality, overall environmental impacts) on neighbouring residences and amenities.
4. Creation of temporary employment during construction.

3.3.2. These considerations are posed for all National Highways' Road schemes, and therefore considering these is best practice.

3.3.3. Elements of the Scheme which are likely to relate to the PCGs considered within this assessment are outlined in Table 3-1. They have been mapped against the four considerations numbered above.

**Table 3-1 - Elements of the Scheme which are likely to relate to the PCGs**

Scheme element	Description	Related Scheme consideration
Congestion during construction	It is recognised that construction closures may cause temporary increases in traffic which could contribute to short term negative impacts during the Scheme construction.	3
Reduction in congestion post-construction	The Scheme elements will reduce traffic on the A4013 and A40 around Cheltenham. It is expected that congestion will be reduced and subsequently improve air quality and decrease noise levels. This could potentially provide benefits to some PCGs, such as those who suffer from life limiting illnesses.	1

Scheme element	Description	Related Scheme consideration
Access to information on the Scheme	It is important that, in advance of construction, local road users, residents, local businesses and PCGs are provided with a forum to communicate with those progressing the Scheme in order to minimise impacts on communities. This could help inform strategies for effective communication about the Scheme and traffic management. For example, strategies could include geo-targeted social media advertising or information provision at motorway service areas.	1
Changes to WCH routes	<p>Within the CAA for Junction 10, there are several public footpaths and two bridleways. One footpath runs along the length of the A4019 eastbound carriageway from the southbound off slip. These walkers, cyclists and horse rider (WCH) routes provide access to shops, community facilities and residential dwellings.</p> <p>Maintaining access along WCH routes (outside of required closures during construction) and providing benefits to those who travel on foot/cycle will be required. Temporary access arrangements and access to key facilities may be impacted, although it is assumed that any changes to WCH routes will be fully accessible for all PCGs and meet all Inclusive Design<sup>2</sup> requirements.</p>	1, 2
Construction of the Scheme	This will result in impacts on drivers, local communities and those accessing facilities surrounding the Scheme. Impacts of construction which may be relevant to the PCGs included within this assessment relate to temporary arrangements/access diversions along the route as well as impact on access to key facilities, environmental impacts such as construction noise and air quality impacts, and an overall degradation of the environment in surrounding recreational spaces.	3
Temporary employment	The construction of the Scheme will provide temporary employment which could benefit local communities, the unemployed and those from minority backgrounds if a comprehensive and inclusive recruitment strategy is adopted. Assuming an inclusive recruitment approach is adopted, construction of the Scheme presents a good opportunity to maximise benefits for those seeking employment locally, including those from PCGs. It is anticipated that construction of the Scheme will facilitate development in the immediate area. The employment land provided may also provide longer term employment prospects.	4
Air quality impacts	The whole borough of Cheltenham is covered by an Air Quality Management Area (AQMA) which will be considered as part of the Scheme. At the time of writing this EqlA, a qualitative assessment had been undertaken to determine where significant changes in Average Annual Daily Traffic (AADT) would be expected as a result of alterations to Junction 10.	3

<sup>2</sup> The UK government has defined inclusive design as '...a process that ensures that all buildings, places and spaces can be easily and comfortably accessed and used by everyone.' See <https://www.gov.uk/government/publications/2010-to-2015-government-policy-2012-olympic-and-paralympic-legacy/2010-to-2015-government-policy-2012-olympic-and-paralympic-legacy#appendix-6-paralympic-legacy>



Scheme element	Description	Related Scheme consideration
	<p>The Scheme has the potential to affect local air quality pollutant concentrations at sensitive receptors such as schools, hospital, day care facilities, elderly housing, and environmentally sensitive areas, both during construction and operation. Sensitive receptors are areas where the occupants are more susceptible to the adverse effects of exposure to toxic chemicals, pesticides, and other pollutants.</p> <p>The Environmental Statement and Modelling<sup>3</sup> has shown that:</p> <ul style="list-style-type: none"> <li>• <b>Baseline</b> air quality monitoring data indicates that the only exceedances of the annual mean AQS objective for NO<sub>2</sub> within the study area were located within the Cheltenham AQMA. There are no estimated exceedances of the annual mean NO<sub>2</sub> air quality limit value in the Defra PCM model links within the ARN in 2019, although the A40 between Arle Court and Princess Elizabeth Way, which intersects with the ARN, exceeded the limit value in 2018.</li> <li>• Any air quality effects due to <b>construction</b> would be temporary and could be suitably minimised by the application of standard and appropriate mitigation measures. The Construction Dust Assessment identifies the site as high risk and suitable mitigation measures are detailed in the Environmental Statement. With adoption of suitable and proportionate mitigation, there is unlikely to be a significant effect on air quality due to the construction of the Scheme.</li> <li>• In <b>operation</b>, air quality modelling has indicated that the Scheme is unlikely to have significant adverse effects on human health and designated habitats in the opening year.</li> </ul>	
Noise impacts	<p>Current noise policy in England is based on the Noise Policy Statement for England, which through the effective management and control of environmental noise within the context of Government policy on sustainable development, aims to:</p> <ul style="list-style-type: none"> <li>– Avoid significant adverse effects because of the Scheme.</li> <li>– Mitigate and minimise other adverse impacts on health and quality of life.</li> <li>– Contribute to improvements to health and quality of life, where possible.</li> </ul> <p>The Scheme is intended to adhere to the aims of the NPSE. Increases in daytime noise can have adverse impacts on particular PCGs who are likely to be home during the day, such as people with children, disabilities and older people. Increases in noise near schools during the daytime can also have an adverse impact on children’s cognitive ability.</p> <p>Construction</p> <p>The construction noise assessment in the environmental assessment determined that a number of representative noise sensitive properties, and other properties in the same area</p>	3

<sup>3</sup> As presented in the Environmental Statement (Application document TR010063 – APP 6.2)

Scheme element	Description	Related Scheme consideration
	<p>have the potential for a significant noise effect. Properties that are particularly at risk are those close to the A4019, East of the M5 as well as properties close to the Link Road and any new access roads to individual properties.</p> <p>With mitigation in place, as well as good community engagement, the impact of the construction noise will be limited.</p> <p>During the day, evening and night there are representative properties predicted to exceed the threshold value for a moderate or major impact, with small number which would also exceed the threshold for noise insulation. At night-time there are six representative properties exceeding the threshold for temporary rehousing.</p> <p>In most cases, construction works that are very close to a residential property will be transitory in nature and it is unlikely that the moderate or major works would exceed the duration threshold due to the nature of the works. Therefore, construction noise is unlikely to lead to significant effect, including temporary rehousing or noise insulation.</p> <p>Operation</p> <p>The operational assessment considered the changes in noise due to traffic and Scheme layout, in both the short-term and long-term. Mitigation was included in the assessment where possible, to improve noise levels in noise important areas as well as the informal Traveller site.</p> <ul style="list-style-type: none"> <li>- It was determined that a potential significant adverse noise effect was predicted on Stoke Road during the daytime, due to minor increases in noise where noise levels already exceed the significant observed adverse effect level threshold. Additional significant adverse effects are predicted at Hayden Road and Fiddlers Green Lane during the day. At night, there are additional properties with minor to moderate increases in noise where noise levels already exceed the significant observed adverse effect level threshold.</li> <li>- A cumulative assessment has also highlighted potential adverse impacts to Down Hatherley Road, Telstar Way, Boddington Road and Hester's Way Road. In addition to properties around Drews Court and Brockworth Road</li> <li>- Benefits are predicted on the A4019, the M5 and Withybridge Lane, Staverton Park, Swindon Road, Marsland Road and Fiddlers Green Lane, Hayden Lane and the B4634.</li> </ul>	



## 3.4. Socio-Demographic Profiling

### Introduction

- 3.4.1. This section seeks to identify the representation of PCGs within the CAA of the Scheme across the following groups: age, sex, disability, race, religion and pregnancy and maternity.
- 3.4.2. Marriage and civil partnerships, gender reassignment and sexual orientation PCGs have been screened out during the screening process outlined in Section 2. These PCGs are not expected to be disproportionately impacted by this scheme and therefore have not been included in the EqlA.
- 3.4.3. Unless otherwise stated, Census 2021 data has been used to obtain statistics for these groups. Statistics have been calculated for the CAA using Output Areas (OAs) and Lower Super Output Areas (LSOAs) which fall within the 1km CAA<sup>4</sup>.
- 3.4.4. The statistics for the CAA are then compared to the surrounding local area, which is comprised of the local authorities of Cheltenham, Gloucester and Tewkesbury, and national statistics for England. In some instances, figures are included for the South West region of England. In this report the CAA is referred to as Junction 10.
- 3.4.5. The findings from this section help expand on the methods and materials used in the consultation and help provide justification for the consultation approach in Section 4.

## 3.5. Age

- 3.5.1. The needs, behaviour and barriers people face differs between age groups. For example, some age groups are less confident with changes to their usual behaviours (generally children and older people), have more safety and security concerns associated with works, or are less able to make changes to their usual behaviours (either through mobility or being financially constrained). Access to different facilities generally varies by age, including children requiring access to education, working age to employment and childcare, and older people to healthcare and for social interaction. The breakdown of the population within the CAA according to age is presented in Table 3-2 below.

**Table 3-2 - Breakdown of Population according to Age<sup>5</sup>**

Group	CAA	Local Area	England
Children (Aged Under 16)	18.1%	18.3%	18.6%
Younger People (Aged 16-24)	8.8%	10.3%	10.6%
Working age (Aged 16-64)	62.0%	62.6%	63.0%
Older People (Aged 65+)	19.8%	19.1%	18.4%

- 3.5.2. The proportion of children and younger people in the CAA is in line the local area and England average. There are 1.4% more people aged 65+ years old in the CAA

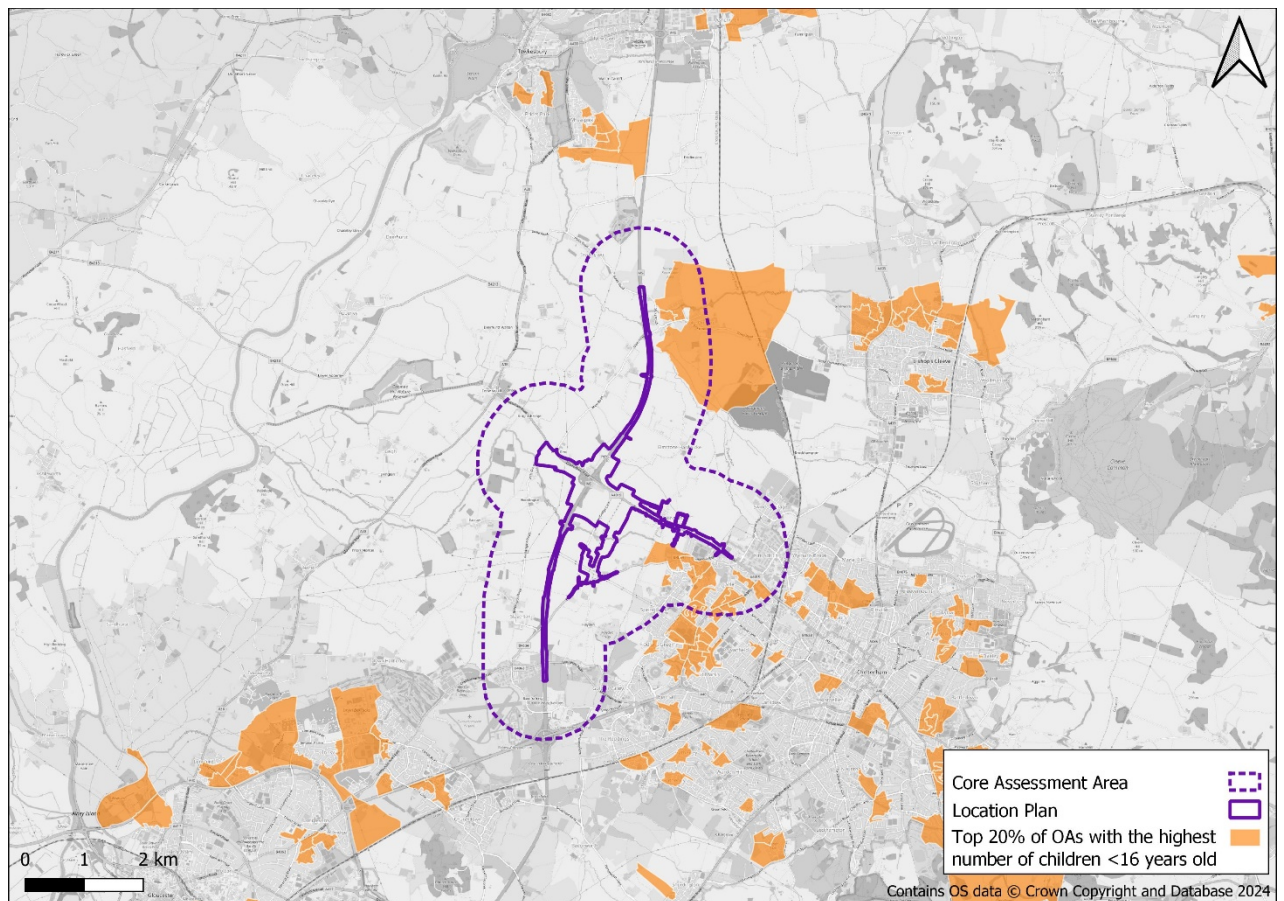
<sup>4</sup> Please note, where any area of an OA or LSOA falls within the CAA, it is included in the statistics.

<sup>5</sup> Totals will not add up to 100% due to the breakdown of age PCG being considered.

compared to the national average. Older people should be considered due to any changes to access routes to medical, care or community facilities as individuals in this age group may require these facilities regularly and may have specific travel needs/requirements.

- 3.5.3. The proportion of working aged people in the CAA is in line with the local area and England average. The creation of temporary employment as a result of the Scheme may increase employment rates in the area and the proportion of the population which is of working age. Furthermore, the creation of additional housing and employment developments in the area in future, is also likely to see this percentage increase.
- 3.5.4. A total of 8.8% of the Junction 10 population are between 16-24 years old. Young drivers may be less experienced and therefore less confident. Clear, uncomplicated diversion routes and informative road signage is important.
- 3.5.5. The geographic distributions of the highest proportions of children, younger people and older people are presented in Figure 3-1 to Figure 3-3.

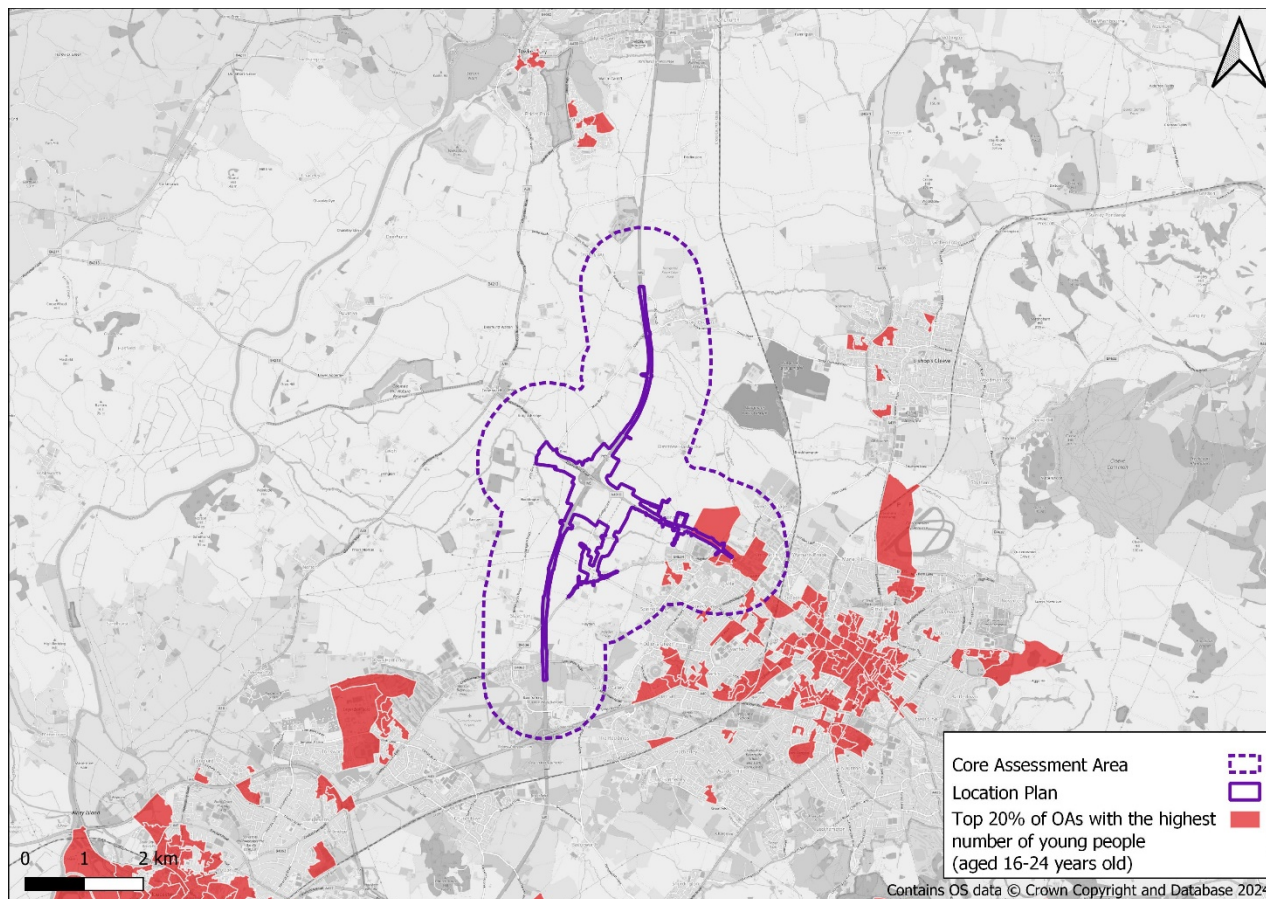
**Figure 3-1 - Proportion of Children (Under 16s) in the CAA - Census 2021**



- 3.5.6. Figure 3-1 shows that within the CAA, there are areas with higher proportions of children to the north-east and south-east of the Scheme area. These areas of high concentration include areas around Arle and Hester's Way to the south-east, and Stoke Orchard to the north-east. Outside of the CAA, children are highly concentrated around Bishops Cleeve, to the south-west of the Scheme in Innsworth, Longford and Elmbridge and more generally around Cheltenham and Gloucester.
- 3.5.7. Figure 3-2 illustrates the proportion of young people (16-24 years old) within the CAA. There is a similar concentration to that of children in the south-eastern segment of the CAA, as well as a concentration on the eastern extent of the Scheme at Kingsditch.

3.5.8. Outside the Junction 10 CAA, there are pockets of young people concentrated in central Cheltenham and on the outskirts of Gloucester (particularly Innsworth), as well as a larger area around the A417, west of the study area, including Hartpury, Staunton and Ashleworth.

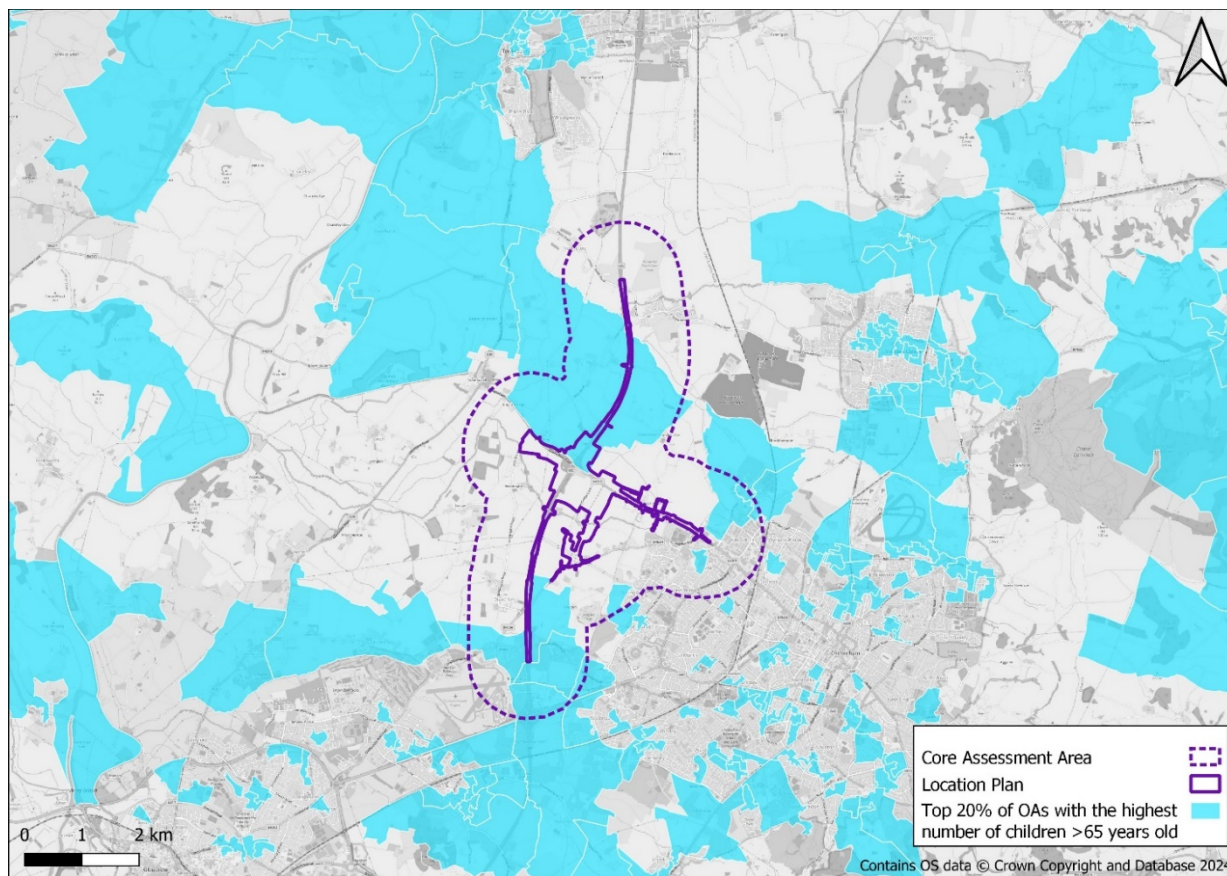
**Figure 3-2 - Proportion of Young People (Aged 16-24) in the CAA – Census 2021**



3.5.9. Figure 3-3 illustrates that the Junction 10 CAA includes higher proportions of older people directly to the north of M5 Junction 10 in Hardwicke. In addition, there are high proportions of older people in Swindon Village, Finders Green and Arle to the east of, and directly north of M5 Junction 10. Outside of the CAA there are a number of areas that have a higher proportion of older people, including large areas in south Tewkesbury and in the north Cotswolds, including Winchcombe.



**Figure 3-3 - Proportions of Older People (Over 65s) in the CAA - Census 2021**



### 3.6. Sex

3.6.1. The breakdown of the population within the CAA according to sex is presented in Table 3-3 below.

**Table 3-3 - Breakdown of Population according to Sex**

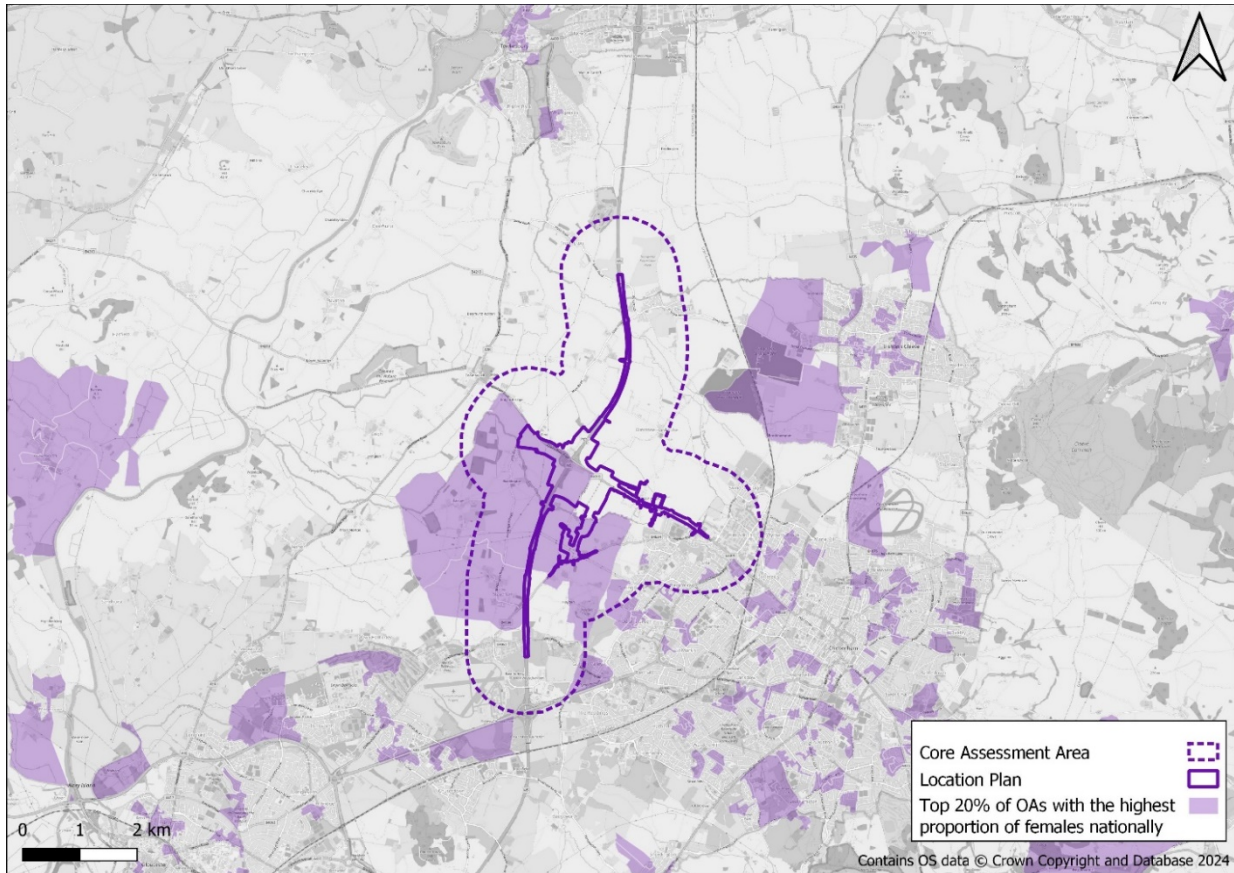
Group	CAA	Local Area	England
Females	51.0%	51.0%	51.0%
Males	49.0%	49.0%	49.0%

3.6.2. The proportion of females within the CAA is in line with the local area and national average.

3.6.3. Figure 3-4 illustrates there are larger proportions of females within the CAA, notably to the south. Additionally, there are numerous clusters of females in the highest 20% nationally surrounding the outside of the area.

3.6.4. The proportion of females outside the CAA is highest around Bishop's Cleeve, Hartpury, Ashleworth and Innsworth. Also, several small areas dispersed across Cheltenham exhibit a high proportion of females in the population.

**Figure 3-4 - Proportions of Females in the CAA – Census 2021**



3.6.5. Sex of individuals is examined in the EqlA due to the potentially different barriers faced by males and females when travelling, and possible different access levels to facilities and services. Women have the potential to experience more safety concerns, particularly when travelling alone, which in turn can negatively impact their perception of safety and confidence about travelling. Consideration will need to be given to any changes to access along the route and provide information about alternative routes and journey planning to assist women, thus improving or maintaining the quality of their current present travel experience.

### 3.7. Disability

3.7.1. The breakdown of the population within the CAA by disability is presented in Table 3-4 below.

**Table 3-4 - Breakdown of the Population by Disability**

Group	CAA	Cheltenham	Gloucester	Tewkesbury	England
Personal Independence Payments (July 2024)	N/A	3.8%	5.7%	4.0%	5.4%
Limiting Long Term Illness (activities limited a little or a lot) (2021)	17.7%	15.9%	15.4%	19.2%	17.5%

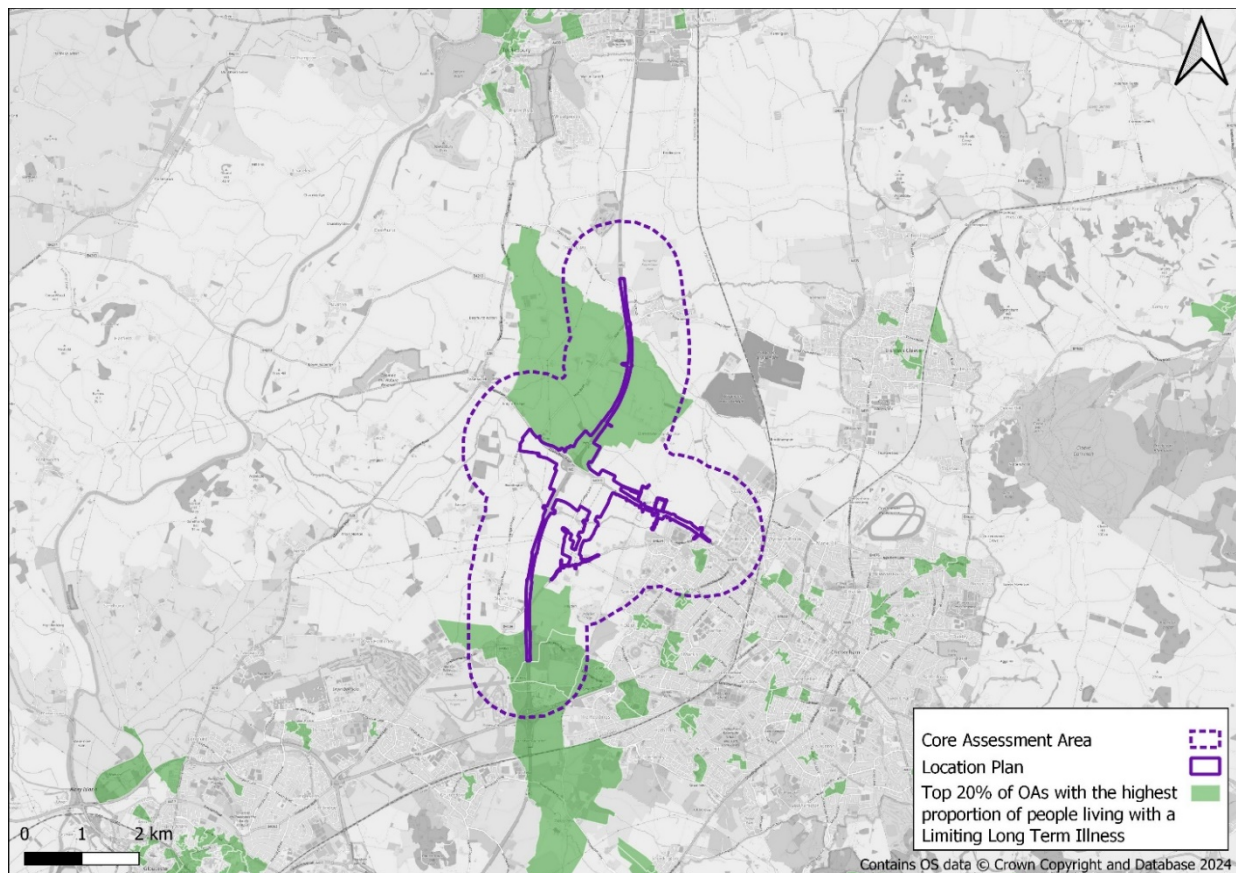
3.7.2. CAA data was not available at a low enough disaggregation for Personal Independence Payments (PIP) and therefore it is assumed that the local area is considered representative of the area surrounding the Scheme. The proportion of the population



claiming PIP in Cheltenham and Tewkesbury is lower than the national average, though the proportion within Gloucester is 0.3% higher than the English average.

- 3.7.3. Those with disabilities can face several barriers relating to travel, including specific travel requirements, limited mobility – specifically related to walking distances or access to public transport – and the requirement for clear information for those with learning disabilities or cognitive impairments. Those with hearing and visual impairments can also be impacted through construction noise. With changes to usual routes as a result of the Scheme, it is important to make sure that information about alternative routes, access points and services are widely available. Communications teams should advise on suitable options for the area, though examples include local council websites and publications, leaflet drops in the local area, the use of social media and information placed in local facilities such as libraries and community centres.
- 3.7.4. Figure 3-5 presents the proportion of people living with a Limiting Long-Term Illness within the CAA. To the south of the Junction 10, there is a cluster of LSOAs with a concentration of the highest 20% of people living with a Limiting Long-Term Illness in England, these cover areas of Bamfurlong, Golden Valley, the Reddings and Badgeworth. In addition, there is an additional area immediately north of Junction 10.
- 3.7.5. Similarly, to those claiming PIP, those with Limiting Long-Term Illness can be affected by changes to accessibility, routes and access to services. Measures should be taken to minimise the impact that the Scheme has on their ability to travel and access local facilities.

**Figure 3-5 - Proportions of those with Limiting Long Term Illness in the CAA - Census 2021**



## 3.8. Ethnicity

3.8.1. The breakdown of the population within the CAA by ethnicity is presented in Table 3-5 below.

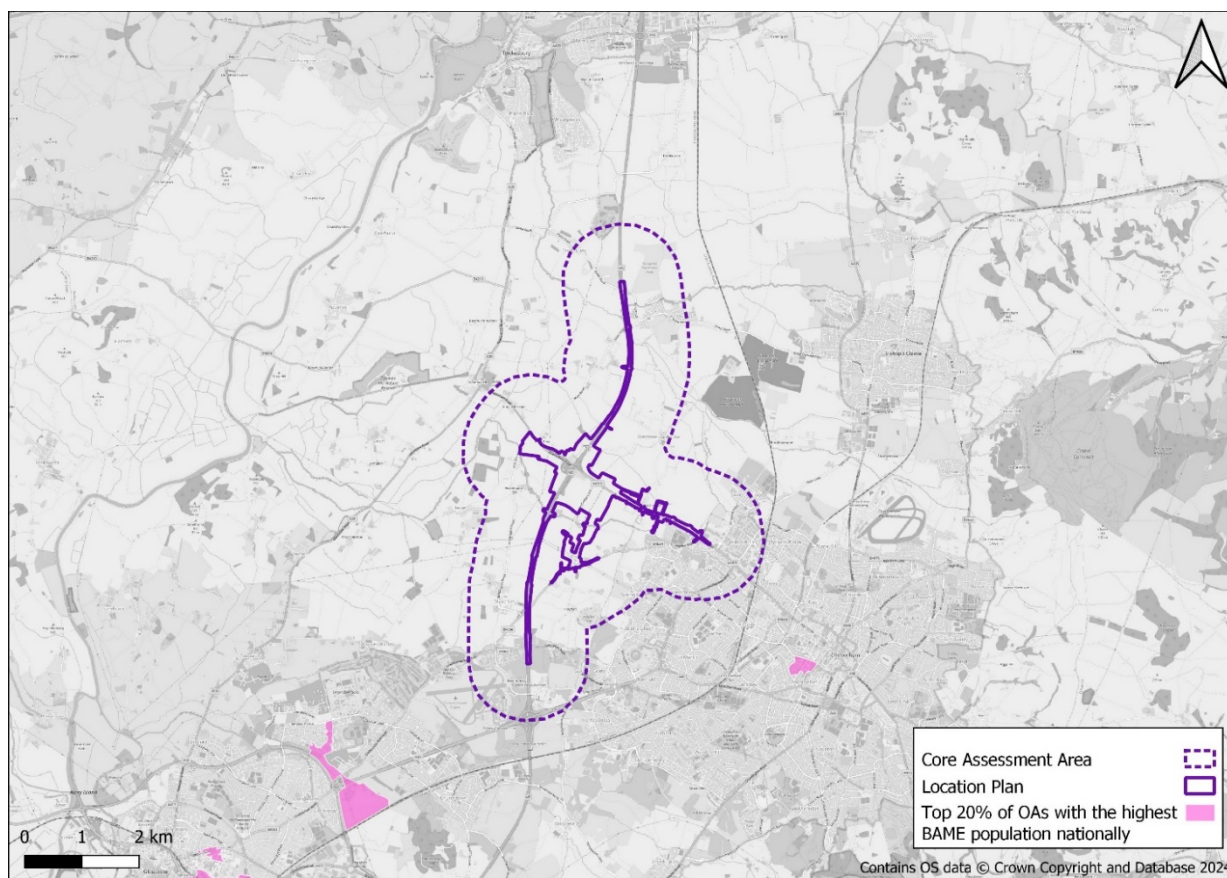
**Table 3-5 - Breakdown of the Population by Ethnicity 2021**

Ethnicity	CAA	Local Area	England
White	91.8%	89.9%	81.0%
Mixed / Multiple Ethnic Groups	2.1%	2.8%	3.0%
Asian / Asian British	4.1%	4.4%	9.6%
Black / African / Caribbean	1.1%	1.9%	4.2%
Other Ethnic Groups	0.9%	0.9%	2.2%
Black and Minority Ethnic Groups Total	8.2%	10.1%	19.0%

3.8.2. The largest ethnic group within the CAA is white (91.8%), which is higher than the local area and considerably higher than the national average (81.0%). The proportion of Black and Minority Ethnic people in the CAA is lower than both the local area and the national average. The proportion of Asian and Asian British, Mixed and Multiple Ethnic Groups and Black, African and Caribbean people is lower in the CAA than locally and nationally.

3.8.3. Figure 3-6 illustrates that there are very few areas with a high proportion of Black and Minority Ethnic Groups (excluding white minority ethnicities) close to the CAA. With a small area in central Cheltenham to the east of the Scheme and a few to the south-west of the Scheme.

**Figure 3-6 - Proportion of Black and Minority Ethnic Groups (BAME) in the CAA – Census 2021**



3.8.4. A further breakdown of the White ethnicity category has been presented in Table 3-6. This is to highlight the higher prevalence of the white Gypsy and Irish Traveller ethnic group within the CAA. The proportion of Gypsy and Irish Travellers is higher in the CAA (0.3%), in comparison to both the local area (0.2%) and nationally (0.1%).

**Table 3-6 - Breakdown of the Population by White Ethnicity 2021**

White Ethnicity	CAA	Local Area	England
English, Welsh, Scottish, Northern Irish or British	82.4%	83.2%	73.5%
Irish	0.7%	0.7%	0.9%
Gypsy or Irish Traveller	0.3%	0.2%	0.1%
Roma	0.1%	0.2%	0.2%
Any other White background	8.3%	5.7%	6.3%
White Total	91.8%	89.9% <sup>6</sup>	81.0%

<sup>6</sup> Due to rounding, this figure is not exactly equal to the sum of the breakdown of White Ethnicity groups.



- 3.8.5. Gypsies, Travellers and Roma are among the most disadvantaged people in the country and have poor outcomes in key areas such as health, education, health, employment, criminal justice and hate crime.
- 3.8.6. It should be noted that there is an informal Traveller site adjacent to the southbound carriageway of the M5, at Cursey Lane. This falls within the CAA and if it was still operational at the time of construction, would be directly impacted, though mitigation is included in the design to ensure that access is retained to the site through construction period, and also when the Scheme is complete. This is examined further in section 4.6.

## 3.9. National Insurance Number Registration (NINo)

- 3.9.1. The number of National Insurance Number registrations (NINo) across the local area and England are presented below in Table 3-7, shown as a percentage of the total registrations within each area.

**Table 3-7 - National Insurance Number Registrations (April – June 2024)<sup>7</sup>**

World Region	Cheltenham	Gloucester	Tewkesbury	England
European Union	6.4%	5.3%	9.7%	8.9%
Other Europe	14.3%	9.5%	8.3%	7.8%
Asia	51.4%	47.3%	51.4%	57.9%
Rest of the world	30.7%	37.9%	33.3%	23.1%
Other	0.0%	3.6%	0.0%	2.3%

- 3.9.2. NINO data<sup>8</sup> shows that between April 2024 and June 2024 (the most recent quarter of data available), the largest number of National Insurance Number registrations in the local area were from Asia. Overall, these were lower proportions than those in England, however Tewkesbury had a higher proportion of EU allocations than the country percentage.
- 3.9.3. Cheltenham had the highest proportion of National Insurance Number registrations from Other Europe than the other local areas and England percentages.
- 3.9.4. Cheltenham, Gloucester and Tewkesbury all had larger proportions of National Insurance Number registrations from the rest of the world in comparison to England.
- 3.9.5. This data shows a considerable range of language requirements may be apparent for residents in the area. Language requirements should be considered in the Stakeholder Engagement and Communication Plan, for translation purposes (particularly for the most popular languages in the area) and to ensure communications are as visual as possible, and in plain English. Often audio information can be easier to comprehend than written material for people whose first language is not English.

## 3.10. Religion

- 3.10.1. The religion or faith of an individual may impact on their needs and access requirements. This may include accessing a number of different religious establishments

<sup>7</sup> Statistical disclosure control has been applied to this table to avoid the release of confidential data. Totals may not sum due to the disclosure control applied.

<sup>8</sup> DWP via StatExplore <https://stat-xplore.dwp.gov.uk/> March 2022 download

or food stores (e.g. Halal stores) on different days of the week and different times of day. The proportion of the population who are religious or subscribe to a belief system across the CAA, the local area and England are presented below in Table 3-8.

**Table 3-8 - Breakdown of the Population by Religion/Belief 2021**

Religion	CAA	Local Area	England
Christian	47.7%	47.8%	46.3%
Muslim	1.6%	2.4%	6.7%
Hindu	0.9%	0.9%	1.8%
Jewish	0.1%	0.1%	0.5%
Buddhist	0.3%	0.4%	0.5%
Sikh	0.2%	0.2%	0.9%
Other	0.4%	0.5%	0.6%
None/ Not stated	48.7%	47.7%	42.7%

3.10.2. The most prevalent religion in the CAA is Christianity (47.7%); this is above the national average. The proportion of Muslims, Buddhists and other religions / beliefs in the CAA are lower than the local area and national average. The proportion of those who do not subscribe to or did not wish to state their religion / belief is higher in the CAA compared to the local and England.

3.10.3. There are a diverse range of religions and beliefs in the area; therefore, it is important to ensure access to all religious establishments throughout construction works if possible. If access is likely to be compromised, stakeholders should be made aware of this in advance of works commencing.

### 3.11. Pregnancy and Maternity

3.11.1. The pregnancy and maternity group need to be considered within an EqIA for reasons including employment practices, possible temporary disability whilst pregnant, specific travel requirements (i.e. travelling whilst pregnant or with children and prams) and access to medical and childcare facilities. In addition, time spent at home during the working day whilst undertaking caring duties can result in disproportionate impacts of a scheme, for example noise and vibration impacts of construction.

3.11.2. Data on pregnancy rates is not widely available, and therefore a good approximation of this is the number of live births within the area. The examination of fertility rates also provides an indicator to the presence of pregnancy and maternity groups within the area. Both data sources are currently available annually at local authority and national level and are presented below in Table 3-9, along with total fertility rate. The data below is the most recently published statistics from 2022.

**Table 3-9 - Number of Live Births and Fertility Rates**

Measure	Cheltenham	Gloucester	Tewkesbury	England
General Fertility Rate (GFR) <sup>9</sup>	45.2	52.9	55.7	51.9
Total Fertility Rate (TFR) <sup>10</sup>	1.32	1.52	1.60	1.49

3.11.3. The General Fertility Rate (GFR) in the Gloucester and Tewkesbury area is higher than that of England. Cheltenham has a lower GFR (45.2) than the national average, whereas Tewkesbury has the highest GFR at 55.7.

3.11.4. The Total Fertility Rate (TFR) in the local area is generally higher than the England average, apart from Cheltenham. As a result, equality issues should be considered for pregnant women or people with young children, both in terms of their ability to access services and their perceptions of safety and security along the Scheme.

## 3.12. Area Background

3.12.1. There are a range of local community facilities relating to the PCGs that may be indirectly impacted as a result of the Scheme, including schools, religious establishments, community facilities and food stores.

3.12.2. In addition to examining the composition of the resident population surrounding the Scheme, amenities in the local area that might be impacted by the Scheme are also considered. This is to ensure that as well as the resident population, the daytime population made up of people visiting the area / travelling within the area to access local amenities, are also considered within the EqIA.

3.12.3. The community amenities presented in Figure 3-7 are all within the CAA. In total, there are 42 identified amenities inside the CAA. Most of these amenities are located to the south-east of Junction 10. These community amenities, as identified in Figure 3-7, are listed below in Table 3-10.

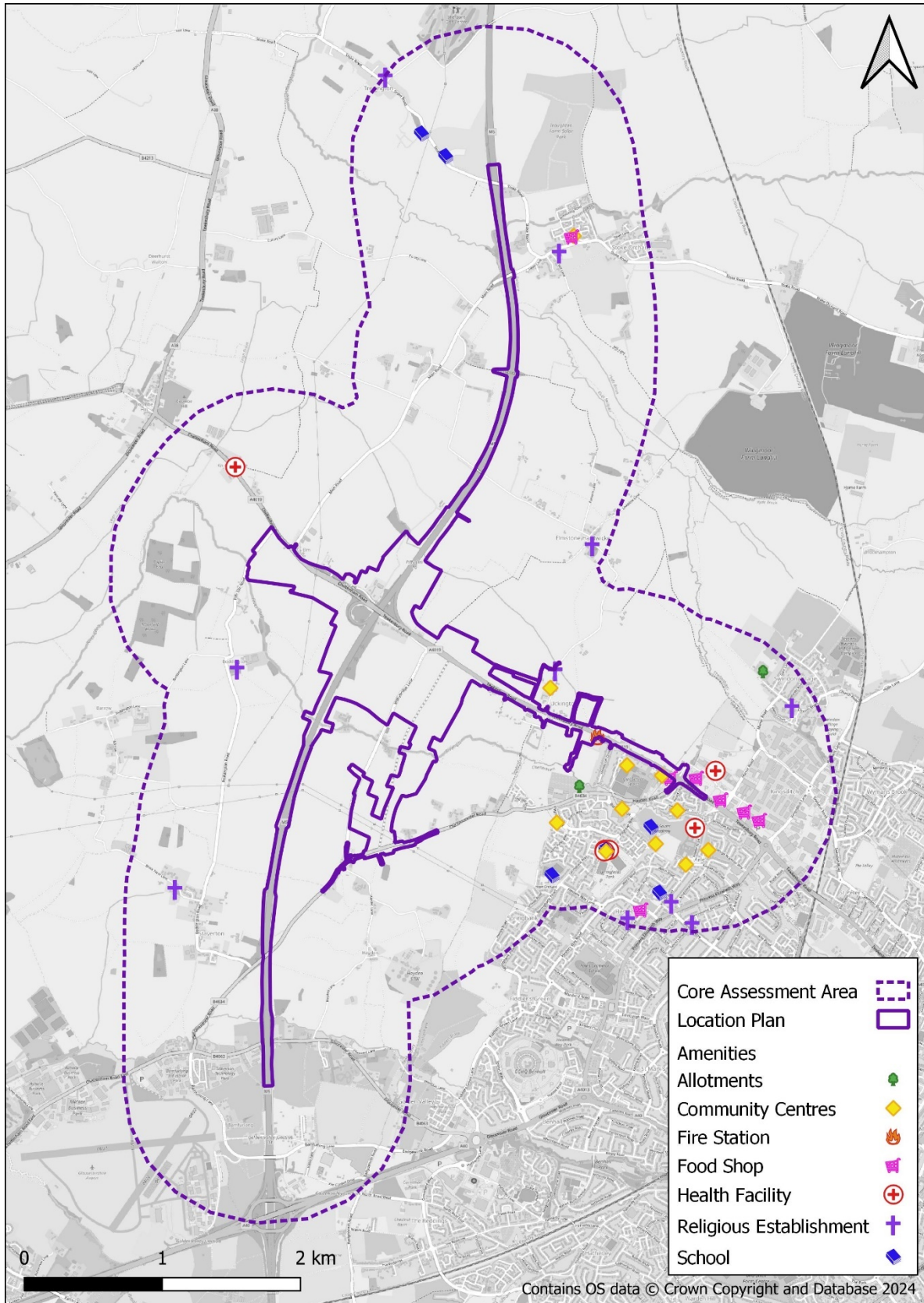
<sup>9</sup> The number of live births per 1,000 women aged 15-44. Measure of current fertility levels (2022)

<sup>10</sup> The TFR is the average number of live children a group of women would have if they experienced the age-specific fertility rates for the calendar year in question throughout their childbearing lifespan. National TFRs are derived by summing single-year ASFRs over all ages within the childbearing lifespan. (2022)

**Table 3-10 - Amenities within CAA**

Amenity	Within the assessment area
Religious establishments	Hester's Way Baptist Church St Barnabas Church St Lawrence Anglican Church St Mary Magdalene (Elmstone Hardwicke) St Thomas Moore Catholic Church Circle of Light, Uckington Baptist Church St James The Great C of E St Mary Magdalene Boddington Church (Boddington) St Catherine, Staverton
Health facilities	Springbank Surgery Cheltenham Pharmacy Springbank Dental Clinic Boots Pharmacy (Gallagher Retail Park) Independent Living Centre Knightsbridge Lodge Assisted Living
Schools	All Saint's Academy Springbank Primary Academy Hester's Way Primary School Giggles Nursery Tredington Primary School Children Lead The Way C.I.C
Community facilities	All Saints' Academy Sports and Community Centre The Cheltenham Civil Service Tennis and Football Clubs Cheltenham West Community Fire Station Energie Fitness George Reading Play Area Hayden Road Allotments Swindon Village Allotments Pilgrove Way Playground Sports Direct Fitness Uckington and Elmstone Hardwicke Village Hall Voyage Care Wentworth Court (Dementia Care Home) Springbank Community Resource Centre Stoke Orchard Community Centre
Food stores	Sainsbury's Aldi Lidl The Food Warehouse by Iceland The Co-operative Food M&S Foodhall The Orchard Stores

Figure 3-7 - Community Facilities within the CAA



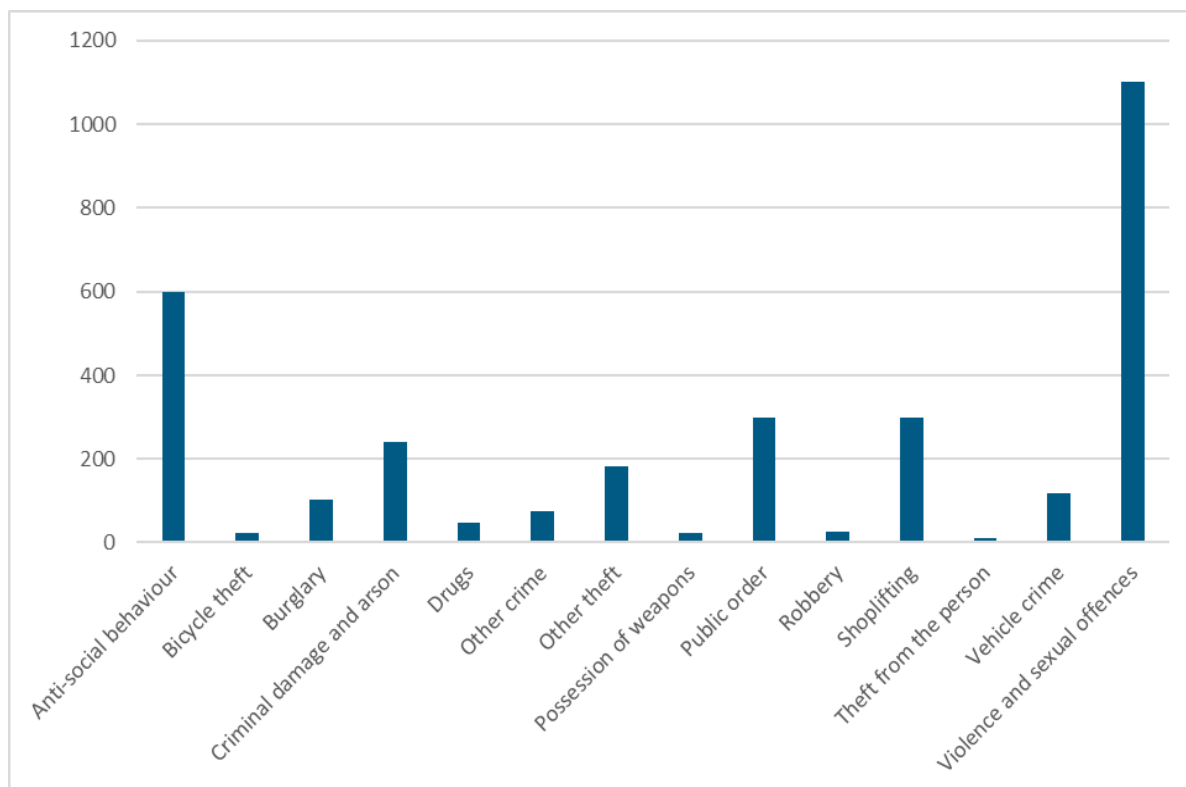
3.12.4. As All Saints' Academy, Springbank Primary Academy, Hester's Way Primary School, Giggles Nursery, Tredington Primary School and Children Lead The Way C.I.C School are within the CAA, their locations should be taken into account when considering the



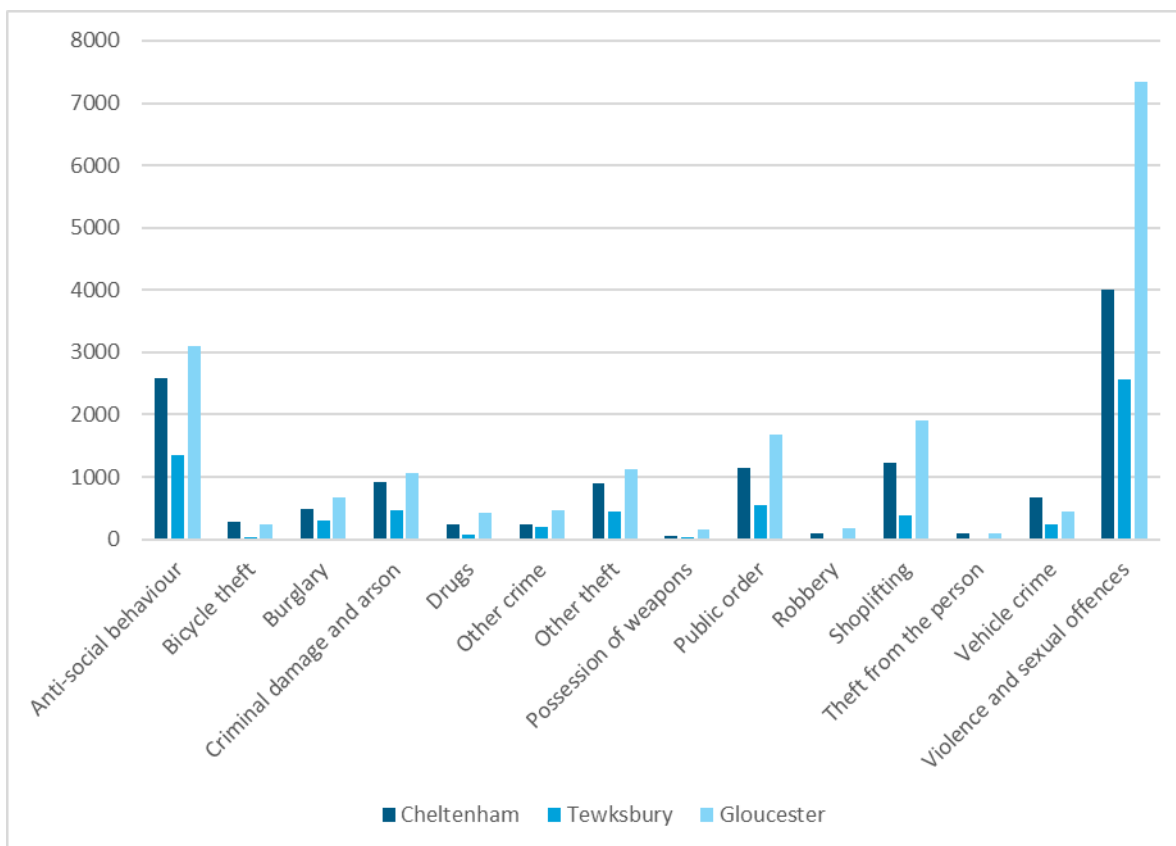
impact of the Scheme (particularly in relation to any impacts on routes to school, walking, cycling and horse-riding safety and any potential increase in air or noise pollution, as children in particular can be affected by these impacts).

- 3.12.5. There are also several community facilities, food stores and religious establishments in very close proximity to the Scheme. These amenities are likely to be trip attractors for a wide range of PCGs within the area, including older people for social interaction, children and specific religious groups (Christians in particular).
- 3.12.6. There are a significant number of community amenities, schools and shops located outside of the CAA to the south and east of the Scheme. Delays to traffic flow during the construction period through diversions or temporary facilities may impact on access to these facilities and subsequently negatively impact on PCGs.
- 3.12.7. It should be noted that whilst identification of community facilities goes some way to understanding daytime populations in the CAA, the largest non-resident population present in the vicinity of M5 Junction 10 will be road users (drivers and passengers) and employees who work in the area but may live outside of the vicinity of M5 Junction 10. There is however no widely available statistics on the demographics of road users, and therefore presence of all PCGs is considered for this group.
- 3.12.8. In addition to surveying the community facilities within the CAA, crime levels have also been examined. This allows increased understanding of the environment and sensitivities of the area. It also identifies areas for consideration in terms of safety and security, particularly around accessibility issues.
- 3.12.9. Reported crimes within Lower Super Output Areas (LSOAs) in the CAA for August 2023 to July 2024 have been summarised and are shown in Figure 3-8. This shows that the most common crimes recorded in the CAA in the year shown were violence and sexual offences, followed by anti-social behaviour.

**Figure 3-8 - Total Crime Occurrences in the CAA – between August 2023 -July 2024**



**Figure 3-9 - Total Crime Occurrence in the Local Area - August 2023 -July 2024**



- 3.12.10. Figure 3-9 shows that the most commonly occurring type of crime in Cheltenham, Gloucester and Tewkesbury is violence and sexual offences<sup>11</sup>, followed by anti-social behaviour. Gloucester and Cheltenham have a higher number of crimes than Tewkesbury, which is in line with Tewkesbury having the lowest population size. Therefore, it is important to use this data to compare the types of crime rather than the absolute number. There are also spikes in criminal damage and arson, theft and public order offences across the three local areas, compared to other crime types.
- 3.12.11. The most common types of crime committed tends to be the same across all three geographical areas and this is also reflected in the CAA. Overall, there were 3,147 crimes in LSOAs which overlap with the CAA during the 12 month period between August 2023 to July 2024. In the same period, there were a total of 38,512 crimes reported in Cheltenham, Tewkesbury and Gloucester.
- 3.12.12. Hate crime data<sup>12</sup> has been examined for this EqlA as this relates specifically to the PCGs included within this assessment. Data for the CAA is not available; however, data for Gloucestershire, South West of England and England is available.
- 3.12.13. As seen below, hate crimes in Gloucestershire have been compared to the South West average and English national average. There is a slightly lower proportion of race, religion and sexual orientation related hate crimes in Gloucestershire than in the South West and England as a whole. Gloucestershire has a higher proportion of transgender

<sup>11</sup> Crime by type downloaded in September 2024 from <https://data.police.uk/data/>

<sup>12</sup> Data accessed at [Hate crime, England and Wales, 2022 to 2023 second edition - GOV.UK \(www.gov.uk\)](https://www.gov.uk) on 19<sup>th</sup> September 2024

and disability related hate crimes compared to the South West and England. This is shown in Table 3-11.

**Table 3-11 - Hate Crime Data (2022-2023)**

Hate Crime type	Gloucestershire	South West	England
Race	64.1%	68.6%	70.5%
Religion	3.9%	4.1%	5.7%
Sexual orientation	15.6%	16.9%	16.4%
Disability	14.4%	10.8%	9.3%
Transgender	5.8%	4.0%	3.2%

### 3.13. Key Findings

- 3.13.1. There are some instances of slightly lower proportions of children, young people, and working aged people within the CAA when compared to the local area, and a higher proportion of people over 65 years old, when compared to the local and national average.
- 3.13.2. The proportion of females in the CAA is in line with the local and national average.
- 3.13.3. The proportion of people claiming Personal Independence Payments varied between the local areas, with Cheltenham having the lowest (3.8%), and Gloucester having the highest (5.7%), though these are not dissimilar to the national proportion of claimants (5.4%). Those living with a long-term illness that limits activities in their day-to-day life, is higher than the national average and the local area. There is a significantly higher proportion of white people than the national average, subsequently there are lower proportions of Black, Asian and Minority Ethnic (non-white minority ethnic) groups in comparison to the national average.
- 3.13.4. Within the CAA there is a higher proportion of Gypsy and Irish Travellers amongst the White ethnic group, than the average for the local area and nationally.
- 3.13.5. The proportion of National Insurance Number registrations in Tewksbury from the EU is higher than in England and the surrounding areas. Cheltenham had the highest proportion of National Insurance Number registrations from Other Europe than the other local areas and England percentages. Cheltenham, Gloucester and Tewkesbury all had larger proportions of National Insurance Number registrations from the rest of the world in comparison to England. The proportion of Christians in the CAA is higher than the local area and much higher than the national average. The proportion of Muslims, Buddhists and 'other' religions in the CAA are all lower than the local area and national average.
- 3.13.6. The General Fertility Rate (GFR) in the Gloucester and Tewkesbury area is higher than that of the England average. Cheltenham has a lower GFR than the national average. The Total Fertility Rate (TFR) in the local area (Gloucester and Tewkesbury) is generally higher than the England average, apart from Cheltenham.



- 3.13.7. Whilst the proportion of some PCGs are broadly lower than the local and/or national average across the EqIA categories, they are still present in CAA and should be considered in the EqIA.
- 3.13.8. The most common crime types are violence and sexual offences and anti-social behaviour across all areas.
- 3.13.9. It should be noted that a small proportion of the local population are landowners<sup>13</sup> whose land may be impacted by the Scheme, who could also fall into PCGs. However, identifying whether any of the landowners would be identified as being within a PCG could not be used explicitly to ensure their data is protected. Therefore, specific landowner demographics data has not been collected. Nonetheless, landowners have been consulted with, and the landowner liaison for the Scheme is continuous.

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<sup>13</sup> As identified in the Environmental Impact Assessment Scoping Report, 2021

## 4. Consultation

- 4.1.1. In autumn 2020, an options consultation was undertaken. This was followed by a preferred route announcement (PRA) in June 2021, which preceded the statutory consultation that ran from the end of 2021 into 2022. Please refer to the full Consultation Report<sup>14</sup> for full details.

### 4.2. Options Consultation

- 4.2.1. The options consultation took place between 14 October and 25 November 2020. Due to the COVID-19 pandemic, no face-to-face engagement took place; this was in line with government guidelines in place at the time of the consultation. Instead, all direct engagement was conducted virtually, overseen by the Scheme's stakeholder engagement team and undertaken by technical experts and project managers for the Scheme elements. The options consultation asked for feedback on the package of alterations. These included: alterations to M5 Junction 10; a new road linking Junction 10 to west Cheltenham; A38/A4019 Junction alterations at Coombe Hill; and widening of the A4019, east of Junction 10.
- 4.2.2. The options consultation had a sizeable response rate, with 475 responses received, despite restrictions in place because of the COVID-19 pandemic. Analysis found that the consultation had a wide reach, with responses received from landowners, local residents, businesses and those with a wider interest in the Scheme.
- 4.2.3. As a result of the options consultation, it was confirmed that the A38/A4019 Junction alterations at Coombe Hill would be progressed as a separate scheme.
- 4.2.4. Overall, the options consultation demonstrated that most participants (84%) agreed that there is a clear need for the Scheme. The preferred option was to upgrade the existing junction with a grade separated roundabout centred on the existing junction.
- 4.2.5. Weekly summaries of consultation responses were used to assess the overall number of participants and the level of engagement by key social groups. Targeted engagement, through direct email to organisations linked to underrepresented groups, was conducted mid-way through the consultation to increase engagement from young people and Black, Asian and Minority Ethnic groups, as these were identified as being underrepresented early in the process. This targeted approach was effective in increasing the overall response rate and responses by key social groups.
- 4.2.6. Attempts to reach a range of social groups were reasonably successful, but it was acknowledged that further targeted engagement should be considered in the statutory consultation, to ensure that responses are representative of the demographics of the local population in future.

### 4.3. Preferred Route Announcement

- 4.3.1. On 16 June 2021, the preferred route announcement (PRA) was released stating that Option 2 was being progressed. The preferred scheme incorporates design changes which have been made as a result of public feedback received during the options consultation and further technical work that has progressed since late 2020. The chosen design to progress presented the best opportunity to deliver a scheme, which meets the

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<sup>14</sup> Consultation Report - Main Report - TR010063 – APP 5.1 and Consultation Report – Appendices - TR010063 – APP 5.2

needs of the Scheme users and the local community, addresses the Scheme objectives and delivers a return on investment.

- 4.3.2. Following on from the PRA, a statutory consultation was undertaken, to seek further feedback on the detailed proposals.

## 4.4. Statutory Consultation

- 4.4.1. The Applicant held a ten-week statutory consultation between Wednesday 8 December 2021 and Tuesday 15 February 2022. This was held under Part 5 of the Planning Act 2008. This consultation was an opportunity to seek views on aspects of the Scheme.
- 4.4.2. Information was provided on various topics including the Scheme alignment, environmental assessments, impacts and mitigation measures and wider impacts of the Scheme such as congestion, active travel and the landscape.
- 4.4.3. The consultation aimed to enable and encourage members of the public to have their say on the Scheme to maximise local benefits. The purpose of the consultation and the consultation materials was to help people understand how the proposals support wider strategic and local objectives, the local impact of the proposals and enable people to consider the mitigation measures to provide the opportunity to give feedback on the Scheme.
- 4.4.4. A total of 571 responses were received during the consultation. The respondents' demographics are further examined in section 4.8.

## 4.5. Consultation Events

- 4.5.1. As part of the consultation, a 'digital first' approach was adopted in the light of COVID-19, however it was also recognised that some audiences were unable or uncomfortable with engaging through digital platforms. Therefore, two face-to-face events were held alongside four virtual events.
- 4.5.2. Two face-to-face public consultation events were held to allow the local community to view the proposals, talk with representatives from the Applicant's project team and provide written feedback. The consultation event locations were identified based on their accessibility for people living within the vicinity of the Scheme. It was ensured that each venue provided accessible entrances, clear signage and suitable COVID-19 hygiene measures, and the Applicant endeavoured to provide a comprehensive schedule of dates and times for the programme of face-to-face events and all events were held in accordance with the latest government guidelines on COVID-19.
- 4.5.3. At the face-to-face events an 'Access Area' was also set up, which had a table with a touchscreen tablet that displayed all the information in an accessible format (including captions and alternative text where appropriate). There were also noise-cancelling headphones available to use, for anyone who was hard of hearing, had sensory difficulties or a disability which made it difficult for the attendee to access the information being presented at the event.
- 4.5.4. The first event took place at Cheltenham West Community Fire Station (Tewkesbury Road, Uckington, Cheltenham, GL51 9SN) on Tuesday 14 December 2021 between 10am-7pm and the second event was at Hesters Way Community Resource Centre (Cassin Drive, Cheltenham, GL51 7SU) on Saturday 15 January 2022 between 10am – 5pm.
- 4.5.5. Digital and printed copies of the consultation materials were available at the consultation events to review. Copies of the consultation brochure and survey were available to take away at the consultation events and responses sent back separately via a Freepost

address. Feedback on the Scheme could also be provided at the events by completing either an online or paper version of the consultation survey or by emailing M5Junction10@atkinsglobal.com. HYPERLINK "mailto:"

4.5.6. A series of virtual consultation events provided an additional platform for the local community and stakeholders to view the proposals. Four virtual consultation events were held, where attendees had the opportunity to listen to members of the Applicant's project team present the proposals and ask questions. These events were free and open to everyone and, as with the face-to-face consultation events, were planned for a range of times. Events took place on the following dates:

- Wednesday 15 December 2021 7pm – 8:30pm
- Thursday 13 January 2022 2pm – 3:30pm.
- Saturday 29 January 2022 2pm – 3:30pm.
- Wednesday 2 February 2022 7pm – 8:30pm.

4.5.7. Joining instructions, for access via desktop and mobile devices, were made available to ensure the events were accessible to all members of the local community. A recording of each virtual event was uploaded to the Scheme website on the Applicant's website, in an accessible format (with captions and alternative text, in addition to a pdf version of the presentation so people could go through it at their own pace).

## 4.6. Publicising the consultation – all stakeholders

4.6.1. To ensure all stakeholders could take part in the consultation, a range of methods were chosen to raise awareness of the consultation and ensure that the consultation documents were accessible. These are listed below:

- Newspaper and media adverts – to promote the consultation, including dates of the consultation events.
- Posters – posters advertising the consultation were shared with CBC and TBC, local community centres, and were located at a number of public information points. The poster contained a QR code for people to scan linking them to the Scheme webpage. Cheltenham and Tewkesbury libraries also hosted hard copies of the consultation brochure and survey for the duration of the consultation period.
- Postcards mail out – through working with CBC and TBC, a consultation target area was developed for the distribution of consultation information. This was based on who would be most affected by the proposals. This postcard style leaflet provided details of the public consultation events, how to find out more information, and ways in which stakeholders or the public could provide feedback.
- Variable Message Signs (VMS) and A-frames – the consultation was promoted to road users by using VMS and A-frames located at key locations close to the Scheme, such as on the M5, the A4019, and local roads.
- Social media campaign – social media platforms including 'X', formerly known as Twitter, Facebook, LinkedIn, Instagram and YouTube were all used to promote the consultation. This included publicising upcoming consultation events, directing people towards the Scheme webpage, promoting key themes of the Scheme and giving reminders prior to the end of the consultation period.

- Emails and letters – emails and/or letters were sent to local MPs, elected representatives at GCC, CBC and TBC and to local parish council's including Boddington Parish Council, Elmstone Hardwicke Parish Council, Stoke Orchard and Tredington Parish Council, Staverton Parish Council, Swindon Parish Council and Uckington Parish Council, advising them of the consultation and how to get involved.
- Press releases and statutory notices – a press release was sent to 12 media outlets and press publications at the start of the consultation and two weeks before the end of the consultation period. Additionally, an advert promoting the public consultation events was publicised via Gloucestershire Live.
- Ad hoc meetings – meetings with the Applicant could be requested by businesses, residents, interest groups and members of the local community.
- Member briefings – a series of member briefings were held with Gloucestershire County, Cheltenham Borough and Tewkesbury Borough Councils prior to the consultation.
- Emails to seldom heard groups.

4.6.2. Similar to the options consultation, during the statutory consultation, weekly consultation response statistics were used to assess the overall number of participants and the level of engagement by key social groups. This enabled targeted engagement to be undertaken mid-way through the consultation to increase engagement with these underrepresented groups. It was identified that young people, and people with a disability were those who were underrepresented, therefore local youth groups and disability groups were selected to contact. This targeted approach involved emailing a variety of local and national organisations and charities to inform them of the consultation, show them where they could gain further information and explain how to respond (including accessible formats and the Applicant's contact centre).

4.6.3. The groups included:

**Disability partnerships within Gloucestershire:**

- GCC Carer Partnership Board and GCC Autism Spectrum Conditions Partnership Board.
- GCC Learning Disability Partnership Board.
- GCC Mental Health and Wellbeing Partnership Board and GCC Physical Disability and Sensory Impairment Partnership Board.

**External organisations:**

- Gloucestershire Wheels for All.
- Hesters Way Partnership and Neighbourhood Project.
- Royal National Institute of Blind People (RNIB).
- UK Youth Parliament in Gloucestershire.
- Youth Hostels Association.

4.6.4. Another group noted likely to have presence in the area are gypsy and traveller communities, who are also often seldom heard.

4.6.5. As noted in the Environmental Statement, there is an informal Traveller site adjacent to the southbound carriageway of the M5, at Curse Lane, approximately 250m to the north of the existing M5 Junction 10. There appear to be less than 30 separate caravans within the site curtilage; however, the nature of the use means that occupation levels can change. If the site was to remain at the time of construction, the Environmental

Statement has identified it as having high sensitivity. Traveller sites generally experience disruption and/or change disproportionately due to their rural character, which is generally allied to good air quality, low background noise levels, tranquillity and good existing landscape amenity in a rural setting. However, these factors are less relevant for those on this site since they are already experiencing these impacts, due to its proximity to the M5.

- 4.6.6. It should be noted that there is a lack of certainty about who occupies the site at any given time and those in occupation may not be part of a gypsy or traveller ethnic group.
- 4.6.7. In the Environmental Statement the informal Traveller site is treated as a receptor that is assumed to be present during construction and operation of the Scheme. As such, it is assumed access is being maintained to the site through the construction stage and mitigation measures (noise barriers) are included in the design to provide mitigation during construction.
- 4.6.8. A targeted consultation ran from Thursday 22 December 2022 to Friday 03 February 2023, to invite occupiers of the informal Traveller site to respond to the consultation. A process server was used to deliver the information pack containing consultation information, to ensure it was delivered to the site. The information pack included a cover letter explaining the consultation and the documents provided.
- 4.6.9. The informal Traveller site information pack also had a front cover page which included the text *'This pack of documents provides information regarding the M5 Junction 10 Improvements Scheme statutory consultation. Both the printed documents and the USB contained in this pack include the same information and details on how you can respond to the statutory consultation. If you require this pack translating into this language, please email [m5junction10@atkinsglobal.com](mailto:m5junction10@atkinsglobal.com) or call 01454 667900 and leave a message. The consultation period will be 44 days, from 00:01hrs on Thursday 22 December until 23:59hrs on Friday 03 February 2023.'* This text was translated into Polish, Ukrainian, Lithuanian and Bulgarian, as these are known by the Applicant to be the most likely languages spoken on the site.
- 4.6.10. The occupiers of the informal Traveller site did not provide a response to the statutory consultation.
- 4.6.11. The Traveller site is informal and thus an unapproved site, TBC have deemed it illegal and have sought advice from the Borough Solicitor and their Enforcement Team, who have concluded that if the site is not vacated, necessary engagement and legal steps may be taken to ensure the site is cleared of caravans and any unauthorised residential occupation.

## 4.7. Consultation materials produced for the consultation

- 4.7.1. Consultation materials were developed for the statutory consultation. Key materials included the consultation brochure, consultation feedback survey, scheme webpage and portal (including a list of frequently asked questions (FAQs) and 'Hear from the team' video), and the Preliminary Environmental Information Report (PEIR).
- 4.7.2. A scheme webpage and portal were created as the main 'go to' source of information for the statutory consultation. The digital portal acted as an interactive webpage for consultees to navigate certain sections of the Scheme. This was split into schematic areas (M5 J10, A4019 Tewkesbury Road - Subsection 1 and 2 and West Cheltenham Link Road) which could be viewed according to the topic of interest: environment, active travel or road alterations.
- 4.7.3. The portal also included the animation of the Scheme and 'Hear from the team' video with key members of the Applicant's project team and supporting organisations (e.g.,



local authorities, National Highways) discussing the Scheme. The portal offered the local community and stakeholders a more interactive way of understanding the Scheme.

- 4.7.4. Posters advertising the consultation were shared with Cheltenham Borough Council and Tewkesbury Borough Council, local community centres, and were located at public information points. Overall, 18 public information points displayed a poster for the duration of the consultation period which contained a QR code for people to scan linking them to the Scheme webpage.
- 4.7.5. Cheltenham and Tewkesbury libraries also hosted hard copies of the consultation brochure and feedback survey for the duration of the consultation period.
- 4.7.6. Paper copies of consultation materials and the feedback survey could be provided on request by emailing M5Junction10@atkinsglobal.com or by calling 01454 667900 and leaving a message. Documents were available in alternative formats on request by contacting the Applicant via the email or phone number above, including in different languages, accessible PDF, large print, easy read, audio recording and/or braille.
- 4.7.7. All documents were also accessibility checked and digital materials were produced in line with Content Accessibility Guidelines (WCAG), in order to make web content more accessible to people with disabilities. This was to a WCAG AA standard.
- 4.7.8. The materials used in the statutory consultation incorporated text to advise that should people require the materials in an accessible format, or have any specific accessibility needs in relation to the consultation, they should get in touch by emailing M5Junction10@atkinsglobal.com or by calling 01454 667900 and leaving a message.

## 4.8. Consultation respondent demographics

- 4.8.1. Respondent demographics were also sought from those completing the consultation survey. It was not mandatory but helped to identify the socio-demographic profile of those responding to the survey.
- 4.8.2. The demographics are presented in Appendix A. The percentages have been calculated from a total number of those who answered the question, where a respondent has chosen 'prefer not to answer', their answer has been omitted from the total. The data shows:
- **72% of respondents were male, 28% female and 1% non-binary.** This differs from the CAA, where the proportion of the population was approximately half men and half women.
  - **84% were English, 4% any other white background, 3% Welsh.** Ethnicity was reported differently in the survey, as it asked about what group as an individual people feel they belong. However, it could be suggested that the slightly higher proportion from 'any other white' background could be linked to the higher proportion of Gypsy and Irish Travellers in the CAA. There were also 4% of respondents from black and minority ethnic groups.



- **71% were aged between 25-64 years old, 24% over 65 and 5% aged 16-24.** There were a higher proportion of respondents aged between 25-64 years old, and those aged above 65, than those in the CAA within the same age groups. Fewer young people responded to the consultation, than the proportion of young people within the CAA (29%).
- **92% did not and 8% did have a disability.** The proportion of respondents who consider themselves to have a disability cannot be accurately compared to the proportion of the CAA, which has been calculated using those with a long term limiting illness.
- **52% had no religion and 43% were Christian.** The proportions of respondents who did not state a religion was higher than those in the CAA (28%), and respondents stating they were Christian was lower than the CAA figures (72%).

## 4.9. Statutory Consultation Report

- 4.9.1. A full statutory consultation report was published in August 2022 summarising how the statutory consultation was carried out and how responses were analysed.
- 4.9.2. A total of 579 survey responses were received during the statutory consultation (560 online, and 19 hardcopies), supplemented by 38 written responses from statutory and non-statutory consultees, members of the public, and landowners.
- 4.9.3. Through the statutory consultation, broad agreement was found on the need for the Scheme, with 74% of survey respondents agreeing or strongly agreeing with the proposals for alterations to M5 Junction 10. A high-level summary of the report is provided below.
- 76% of respondents agreed or strongly agreed with the proposal for an all-movements signalised junction at M5 Junction 10.
  - 65% of respondents agreed or strongly agreed with the proposal for a new road linking Junction 10 to West Cheltenham. For the options listed to explore restricting traffic movement along Withybridge Lane, 58% of respondents preferred Option 1, followed by 9% of respondents who preferred Option 2.
  - 67% of respondents agreed or strongly agreed with the proposal on A4019 Tewkesbury Road Subsection 1.
  - 62% of respondents agreed or strongly agreed with the proposal on A4019 Tewkesbury Road Subsection 2. 60% of respondents agreed or strongly agreed with our proposals for Gallagher Retail Park junction in 2031.
  - 62% of respondents agreed or strongly agreed with the approach to improve the environmental impacts of the Scheme.

## 4.10. Targeted Consultation and Residents Information Event

### Targeted Consultation

- 4.10.1. Following on from the statutory consultation, it was decided that an additional period of non-statutory consultation would be best practice for the Scheme due to changes in the Scheme's design. This non-statutory consultation was a targeted consultation on the changes with relevant prescribed consultees and Persons with an Interest in Land.
- 4.10.2. The targeted consultation lasted 29 days from 08 August 2022 to 05 September 2022. The design changes aimed to further reduce the impact on the environment, local community and Persons with an Interest in Land where possible.
- 4.10.3. Letters were emailed to all affected landowners (16) and prescribed consultees (22) informing them of the additional targeted consultation. All prescribed bodies were sent the same letter, with a full set of drawings that illustrated the design changes outlined

above. Letters were tailored to the circumstances of each of the 16 affected landowners and this included people whose land might be affected to a different extent than previously envisaged. Each landowner was also sent a tailored drawing showing their land extent and any changes that impacted their land parcel.

- 4.10.4. All affected landowners and prescribed consultees could provide their feedback via an email to the Scheme inbox or by sending in a written representation to the technical team.

### Residents Information Event

- 4.10.5. To keep the local community informed of the Scheme changes, an information session was held on 08 September 2022 between 10am and 7pm at Cheltenham West Community Fire and Rescue Station (Tewkesbury Road, Cheltenham GL51 9SN).
- 4.10.6. This was an opportunity to view updated plans and talk to members of the Applicant's project team about the latest design changes following statutory consultation. A letter drop informing residents of this session took place week commencing 15 August 2022 (to those on and around the A4019 between Gallagher Retail Park and up to and including Withybridge Lane). The information session was however open to all.
- 4.10.7. A total of 48 people attended the session. Key topics discussed included access to A4019; noise mitigation; access to bus services and bus stops and what the next steps were for the Scheme.

## 4.11. Further Targeted Consultation

- 4.11.1. The Applicant undertook a period of further targeted consultation following on from the statutory consultation and additional targeted consultation. As a result of feedback received during the statutory consultation, additional targeted consultation and ongoing engagement with stakeholders, the Applicant subsequently made some proposed changes to the Scheme design.
- 4.11.2. The further targeted consultation lasted 30 days, from Wednesday 18 January 2023 to Thursday 16 February 2023.
- 4.11.3. It was targeted towards affected landowners under s44 of the Act, and Prescribed Bodies under s42(1)(a) of the Act whose role, duties or responsibilities, or area of interest could be affected as a result of the Scheme design changes. All contacted parties could provide their feedback via an email to the scheme inbox or by sending a written representation to the technical team by 23:59hrs on Thursday 16 February 2023.
- 4.11.4. The Applicant received a total of twelve representations to the additional non statutory targeted consultation via email. Matters raised were identified and responded to (please see full Consultation Report<sup>15</sup>).
- 4.11.5. There were no design changes as a response to further targeted consultation.

## 4.12. Targeted Consultation on Bus Lane

- 4.12.1. The Applicant undertook a period of targeted consultation on the proposed bus lane following on from the statutory consultation, additional targeted consultation, and further targeted consultation.

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<sup>15</sup> Consultation Report - Main Report - TR010063 – APP 5.1 and Consultation Report – Appendices - TR010063 – APP 5.2

- 4.12.2. As a result of feedback received during the statutory consultation, additional targeted consultation, further targeted consultation and ongoing engagement with stakeholders, the Applicant proposed to include a bus lane in the Scheme design. The design change aims to provide an enhancement to local public transport provision and infrastructure, and further reduce the impact of the Scheme on the environment and the local community.
- 4.12.3. The targeted consultation on the bus lane lasted 30 days, from Monday 29 May 2023 to Tuesday 27 June 2023. The targeted consultation on the bus lane was targeted towards relevant prescribed consultees under s42(1)(a) of the Act, affected PwL under s44 of the Act as well as relevant non statutory consultees (including key stakeholders, local residents and businesses) whose role, duties or responsibilities, or area of interest could be affected as a result of the Scheme design development.
- 4.12.4. An information session was also held on 7 June 2023 at Cheltenham West Community Fire and Rescue Station, to provide an opportunity for the local community to view updated plans and talk to members of the project team about the latest Scheme proposals.
- 4.12.5. All contacted parties could provide their feedback via an email to the Scheme inbox or by sending in a written representation.
- 4.12.6. The Applicant received a total of nine representations to the targeted consultation on bus lane via email. Please see full Consultation Report<sup>16</sup>.
- 4.12.7. There were no changes to the design of the bus lane as a result of the feedback received to the targeted consultation, and overall, feedback from consultees to the targeted consultation showed that there is support for the bus lane to be included in the Scheme design.

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<sup>16</sup> Consultation Report - Main Report - TR010063 – APP 5.1 and Consultation Report – Appendices - TR010063 – APP 5.2

## 5. Summary

- 5.1.1. The data gathered within this EqlA demonstrates that there are a range of considerations that may potentially impact on some PCGs. The PCGs covering age, sex, disability, race, religion and pregnancy and maternity have been highlighted as experiencing potentially disproportionate impacts as a result of the Scheme. In general terms, these groups have been highlighted due to:
- **Physical accessibility:** Relating to changes on WCH routes, the impact of diversions for pedestrians, road users, and on the local community as a result of traffic displacement and potential severance issues. Access to local community facilities should also be considered (direct or indirect impacts as a result of construction), for example on schools, religious establishments, community facilities, healthcare and food stores.
  - **Accessibility of information on the Scheme:** Appropriate information should be provided to inform local communities about the Scheme both during construction and implementation. There will be a need for clear, uncomplicated information on the Scheme, particularly during construction and when diversions are present, which includes consideration of those with learning disabilities, colour blindness, visual impairments, or those who do not speak English as a first language.
  - **Safety for drivers:** Impact on safety and security of travellers, particularly those who are more vulnerable and overrepresented in accidents, such as children, young males, and older people. Some user groups may also be impacted along the Scheme length or on impacted local roads such as pedestrians, cyclists and motorcyclists. As well as physical safety, this also considers perceived safety issues and whether more vulnerable or unconfident drivers and passengers or those travelling with young children will be impacted (particularly during construction).
  - **Environmental impacts:** Noise or air quality impacts associated with the Scheme, particularly for communities surrounding the Scheme during construction, as well as any impacted local roads. Air quality may temporarily worsen during construction, though the Scheme is unlikely to have significant adverse effects in operation. The temporary worsening during construction could have a disproportionate impact on children, older people and those with disabilities (particularly respiratory illnesses). Noise is likely to temporarily increase during construction from both construction activities and an increase in HGVs. In operation, noise impacts may vary with changes in traffic flows, in areas with additional traffic, noise is likely to increase and for roads with less traffic, noise is likely to decrease. The potential daytime impact of an increase in noise can affect concentration of children.
  - **Creation of employment:** Jobs created during construction of the Scheme. This may benefit local residents, particularly those who are unemployed or who are from minority backgrounds if a suitable employment strategy is adopted.

## 6. Assessment

### 6.1. Level of Impact

6.1.1. The level of impact on PCGs assessed from available information, research and consultation is presented in Table 6-1.

**Table 6-1 - Level of Impact on Equality Groups**

Equality Group (PCGs)	Positive Impact	Negative Impact	Neutral Impact	Summary of reasons and evidence sources (data research and consultation) supporting this analysis	Anticipated pathways of securing mitigation
Sex			X	<p>No evidence to suggest disproportionate impacts on this group.</p> <p>There is a slightly higher proportion of females within the local population, but it is expected that any impact will be mitigated by information provided prior to commencement of the Scheme and through construction re-routing information.</p>	n/a
Religion		X		<p>There is potential for a slight negative impact on people with religious beliefs as a result of the Scheme.</p> <p>This is due to:</p> <p>A potential increase in travel distance for those reaching religious establishments in the core assessment area during construction due to temporary road closures and diversions, including access to St. James Church, Circle of Light and The Pavilion.</p>	<p>During the lead up to, and during construction, advanced notice of road closures, diversions and changes to WCH routes should be communicated. Advised methods include roadside signage and inclusion of dates and closures in local newspapers. Information posters could also be made available in local religious establishments to advise people of any changes to access and suitable alternatives.</p> <p>A Community Engagement Plan should also be prepared and implemented, outlining the methods in which the local and surrounding community will be engaged during construction of the Scheme</p>

An increase in traffic during construction and the impact of the construction environment may disproportionately impact those attending religious establishments, for example Christians, as there is a higher proportion within the core assessment area.

including contact details for key site management. The plan should provide consistent and clear communication to a range of stakeholders including, but not limited to residents, businesses, parish councils and local members (GCC and TBC). The plan must acknowledge the differing perspectives and issues of each stakeholder. The communication methods must seek to meet the inclusivity/accessibility needs of each stakeholder.

A Public Liaison Officer will lead the implementation of the Community Engagement Plan.

Furthermore, there is a requirement to develop and implement temporary traffic management measures that provide continuity of access and egress for all community facilities during the construction stage.

No diversion route may should exceed 250m overall additional length over the route that it is replacing.

Provide temporary signalised crossing facilities should be provided along key WCH desire lines (including on the A4019 at Uckington) during the construction phase, as part of the Traffic Management Plan.

A clear and consistent signage strategy will be designed and implemented, to direct users during construction and support access to community and recreational facilities; and bus stop provision, using footpaths and cycleways.

Users of affected PRow, footpaths and cycleways should be notified of planned diversions (including via information required as part of the Community



				<p>Engagement Plan, with signs along sections to be closed during construction, at least one month prior to the works.</p> <p>Existing crossings and routes only to be diverted or closed once alternative routes are in place.</p>
Age		X	<p>There is potential for a negative impact on age as a result of the Scheme. There is a larger proportion of people over 70 years old when compared to the local area and national average.</p> <p>This is due to:</p> <p>Required changes to travel (i.e. changes to access arrangements, travel routes and diversions) which may impact on unconfident drivers (young drivers and older drivers) as a result construction activity/diversions, children or elderly passengers if required to act in the event of an accident/incident during construction, or children and older people due changes to access routes for WCH routes due to unconfident travel behaviour and stress caused by changes to usual travel options.</p> <p>This may be particularly true near local schools such as All Saints' Academy and surrounding community facilities such as All Saints' Academy Sports and Community Centre.</p> <p>It should also be noted that there are several schools and a high proportion of children located just outside the core assessment area who may similarly be impacted.</p>	<p>During the lead up to, and during construction, advanced notice of road closures, diversions and changes to WCH routes should be communicated. Advised methods include roadside signage and inclusion of dates and closures in local newspapers. Information posters could also made available in local public buildings, such as libraries, village halls and supermarkets to advise people of any changes to access and suitable alternatives.</p> <p>A Community Engagement Plan should also be prepared and implemented, outlining the methods in which the local and surrounding community will be engaged during construction of the Scheme including contact details for key site management. The plan should provide consistent and clear communication to a range of stakeholders including, but not limited to residents, businesses, parish councils and local members (GCC and TBC). The plan must acknowledge the differing perspectives and issues of each stakeholder. The communication methods must seek to meet the inclusivity/accessibility needs of each stakeholder. The plan should also consider how to effectively communicate the bus lane with road users and the surrounding community, and how this may alter how they use this section of road.</p>

			<p>Older people who use bus services may benefit from more reliable bus journeys due to the provisions of the bus lane.</p> <p>The need for clear, simple information on the Scheme and all communications/ consultation on the Scheme to ensure it is accessible for all, regardless of age.</p> <p>Any increase in travel distance to local amenities may impact those with limited mobility, including older people. Maintaining access to all WCH routes and public transport is a priority.</p> <p>There is some assumed mitigation through the development of an inclusive consultation and communication strategy. Giving clear information beforehand will help to mitigate some of the impacts described above. Other potential impacts identified will need to be monitored going forward in the Scheme development.</p> <p>It should be noted that working age groups may experience positive impacts associated with the Scheme, through the creation of temporary employment opportunities during construction, and alterations to A-road and motorway to access employment.</p>	<p>A Public Liaison Officer will lead the implementation of the Community Engagement Plan.</p> <p>Furthermore, there is a requirement to develop and implement temporary traffic management measures that provide continuity of access and egress for all community facilities during the construction stage.</p> <p>No diversion route may should exceed 250m overall additional length over the route that it is replacing.</p> <p>Provide temporary signalised crossing facilities should be provided along key WCH desire lines (including on the A4019 at Uckington) during the construction phase, as part of the Traffic Management Plan.</p> <p>A clear and consistent signage strategy will be designed and implemented, to direct users during construction and support access to community and recreational facilities; and bus stop provision, using footpaths and cycleways.</p> <p>Users of affected PRoW, footpaths and cycleways should be notified of planned diversions including via information required as part of the Community Engagement Plan, with signs along sections to be closed during construction, at least one month prior to the works.</p> <p>Existing crossings and routes only to be diverted or closed once alternative routes are in place.</p>
Disability		X	Overall, there is a negative impact for those with a disability, this is due to:	During the lead up to, and during construction, advanced notice of road closures, diversions and changes to WCH routes should be communicated. Advised methods include roadside signage and

			<p>Disabled drivers or drivers with disabled passengers potentially being unconfident or needing specific recovery assistance in a potential breakdown situation, the effects of which may be exacerbated during construction.</p> <p>Those with learning disabilities, cognitive impairments and mobility restrictions being unconfident with changes to their usual travel routes/behaviour which may arise as a result of construction activity – diversions, change in environment, WCH changes etc.</p> <p>Disabled people who are reliant on buses for transport, such as those unable to drive, may benefit from more reliable bus journeys due to the provisions of the bus lane.</p> <p>The need for clear, simple information on the Scheme and all communications/ consultation on the Scheme to ensure it is accessible for all including those with learning disabilities, visual impairments, colour blindness etc.</p> <p>Although a negative impact has been identified for this group, there is some assumed mitigation through the development of an inclusive consultation and communication strategy. Other potential impacts identified will need to be monitored going forward in the Scheme development.</p>	<p>inclusion of dates and closures in local newspapers. Information posters could also made available in local doctor's surgeries, pharmacies, community centres and supermarkets to advise people of any changes to access and suitable alternatives.</p> <p>A Community Engagement Plan should also be prepared and implemented, outlining the methods in which the local and surrounding community will be engaged during construction of the Scheme including contact details for key site management. The plan should provide consistent and clear communication to a range of stakeholders including, but not limited to residents, businesses, parish councils and local members (GCC and TBC). The plan must acknowledge the differing perspectives and issues of each stakeholder. The communication methods must seek to meet the inclusivity/accessibility needs of each stakeholder. The plan should also consider how to effectively communicate the bus lane with road users and the surrounding community, and how this may alter how they use this section of road.</p> <p>A Public Liaison Officer will lead the implementation of the Community Engagement Plan.</p> <p>Sufficient space should be provided (pavement width for example) to allow pedestrians, including wheelchair users; to travel safely through areas under traffic management.</p> <p>Furthermore, there is a requirement to develop and implement temporary traffic management measures</p>
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				<p>that provide continuity of access and egress for all community facilities during the construction stage.</p> <p>No diversion route may should exceed 250m overall additional length over the route that it is replacing.</p> <p>Temporary signalised crossing facilities should be provided along key WCH desire lines (including on the A4019 at Uckington) during the construction phase, as part of the Traffic Management Plan.</p> <p>A clear and consistent signage strategy will be designed and implemented, to direct users during construction and support access to community and recreational facilities; and bus stop provision, using footpaths and cycleways.</p> <p>Users of affected PRoW, footpaths and cycleways should be notified of planned diversions (including via information required as part of the Community Engagement Plan, with signs along sections to be closed during construction, at least one month prior to the works.</p> <p>Existing crossings and routes only to be diverted or closed once alternative routes are in place.</p>
Ethnicity		X	<p>Currently, there is a negative impact for the Ethnicity PCG, this is specifically for the White Gypsy and Irish Traveller ethnic group within the CAA. There is a higher proportion of this PCG than the regional and national average, and at present there is an informal Traveller site to the north of the M5 Junction 10, which if still situated in its current location, would be directly impacted by the Scheme. This community may have made local social,</p>	<p>During the lead up to, and during construction, advanced notice of road closures, diversions and changes to WCH routes should be communicated. Advised methods include roadside signage and inclusion of dates and closures in local newspapers.</p> <p>A Community Engagement Plan should be prepared and implemented, outlining the methods in which the local and surrounding community will be engaged during construction of the Scheme</p>

		<p>educational, employment and healthcare connections while residing in this location. Therefore, moving them off this land could have an adverse impact on their wellbeing, education, finance and healthcare provisions.</p> <p>There is a lack of certainty about who occupies the site at any given time and those in occupation may not be part of a gypsy or Traveller ethnic group for the purposes of the Equality Act.</p> <p>Ethnicity is also considered in the EqIA due to potential language barriers for those whose first language is not English, and the need for suitable communication materials to meet a language need. This covers residents in the area, and foreign drivers who may be unfamiliar with English roads. In addition, the potential for race related hate crime has been considered, though this is noted to be low in the core assessment area.</p> <p>For the remaining ethnicities, a neutral impact is considered, based on the assumption that any future consultation (if required post the statutory consultation) and communications will continue to be provided in English and translation services offered if requested.</p>	<p>including contact details for key site management. The plan should provide consistent and clear communication to a range of stakeholders including, but not limited to residents, businesses, parish councils and local members (GCC and TBC). The plan must acknowledge the differing perspectives and issues of each stakeholder. The communication methods must seek to meet the inclusivity/accessibility needs of each stakeholder.</p> <p>A Public Liaison Officer will lead the implementation of the Community Engagement Plan.</p> <p>Furthermore, no diversion route should exceed 250m overall additional length over the route that it is replacing.</p> <p>Provide temporary signalised crossing facilities should be provided along key WCH desire lines (including on the A4019 at Uckington) during the construction phase, as part of the Traffic Management Plan.</p> <p>A clear and consistent signage strategy will be designed and implemented, to direct users during construction and support access to community and recreational facilities; and bus stop provision, using footpaths and cycleways. Similarly, clear signage and guidance will be required regarding the use of the bus lane.</p> <p>Users of affected PRoW, footpaths and cycleways should be notified of planned diversions including via information required as part of the Community Engagement Plan, with signs along sections to be</p>
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				<p>closed during construction, at least one month prior to the works.</p> <p>Existing crossings and routes only to be diverted or closed once alternative routes are in place.</p> <p>Access will be maintained to the informal Traveller site (adjacent to the M5) through fields to the north of the A4019 for the duration of the construction phase. The timing of the creation of this access will ensure that access is maintained to the informal Traveller site during construction of the Scheme.</p> <p>In operation of the Scheme, a new access track will be created to the north-east of the M5 Junction 10, as a replacement for the existing access points to the field areas and the informal Traveller site, that have been lost as a result of the new southbound off-slip.</p>
Pregnancy/ maternity		X	<p>A slight negative impact is noted for the pregnancy/maternity group, due to potential safety and security issues when travelling with young children i.e. safety issues in the event of a breakdown / accident / incident during construction, and due to changes in travel routes/behaviours during construction.</p> <p>This can also impact on those experiencing temporary mobility issues and/or disabilities during pregnancy.</p> <p>Pregnant people and those travelling with small children on buses, may benefit from more reliable bus journeys due to the provisions of the bus lane.</p>	<p>During the lead up to, and during construction, advanced notice of road closures, diversions and changes to WCH routes should be communicated. Advised methods include roadside signage and inclusion of dates and closures in local newspapers. Information posters could also made available in local doctor's surgeries, pharmacies, community centres and supermarkets to advise people of any changes to access and suitable alternatives.</p> <p>Sufficient space should be provided (pavement width for example) to allow pedestrians, including pushchair users to travel safely through areas under traffic management.</p>



Indirect impacts on journeys to school, nurseries and other education establishments as a result of construction activity, diversions etc. may also present negative impacts for this group.

Furthermore, there is a requirement to develop and implement temporary traffic management measures that provide continuity of access and egress for all community facilities during the construction stage.

A clear and consistent signage strategy will be designed and implemented to direct both vehicle users and WCH during construction and to support access to community and recreational facilities, reflecting temporary changes to access arrangements.

## 6.2. Potential Risks

- 6.2.1. Potential risks (including insufficient information to make robust decisions) have been considered within the above impact classification. The required mitigation action is shown in Section 8 of this report. Table 6-2 identifies the rationale behind the decision reached from the analysis of the Scheme elements presented within this report against the standard decision options available. The Scheme elements provide an opportunity to advance equality and further evidence of barriers for PCGs should be considered to enable this.

**Table 6-2 - Rationale behind EqIA decision**

Options for Next Steps	Decision
Continue the work - no changes required as identified at the screening stage or following additional analysis in section 4. (There are no unjustified negative impacts and the policy/practice is compliant in terms of the Public Sector Equality Duty)	
Ensure further evidence is gathered to ensure any barriers are removed as identified, as referenced in Sections 6 and 7 of this report. This will include an update of the EqIA at Detailed Design. (Opportunities were identified to advance equality, foster good relations and prevent discrimination)	X
Stop progression on the Scheme (A negative impact has been identified that cannot be justified)	

## 7. Additional Evidence, Research and Consultation

7.1.1. Table 7-1 below provides a description of additional evidence, research and consultation undertaken, required, ongoing or captured to ascertain how the policy or practice will advance equality, prevent discrimination and/or develop good relations with PCGs.

7.1.2. The following activities and monitoring should be done at each occurrence of a scheme change or at a National Highways Project Control Framework (PCF) stage.

**Table 7-1 - Additional Evidence, Research and Consultation**

Activities to address any potential negative impacts or risks and deliver positive impacts	Timeline
Review the EqlA should future public consultation be required, to ensure all potential impacts on PCGs are identified and mitigated effectively.	Updated Sept 2024. Also ongoing
Ongoing monitoring / recording of any impacts raised by PCGs in relation to the Scheme should be undertaken to ensure suitable mitigation is included/developed as the Scheme progresses, and this EqlA updated accordingly.	Ongoing
Liaison with the Applicant's Communications Team on the information strategy and when appropriate ensure an accessible information and consultation approach is adopted (pre and during construction and operation) and any relevant information is included in the EqlA as the Scheme progresses.	Ongoing
Ensure contractors appointed to construct the Scheme are provided with the most up to date EqlA, and suitable approaches are taken to maximise benefits of the Scheme, i.e. considerate constructor approaches, inclusive recruitment approaches etc.	Ongoing
Continue engagement with designers, and (as appropriate) develop mitigation to minimise any impacts to access of community amenities. Ensure mitigation is accessible and sustainable.	Ongoing
Update statistics in the screening and evidence sections of this EqlA should more recent data become available (if programme timings allow), to ensure statistics accurately represent the population living in the CAA.	Data and mapping updated Sept 2024. Also ongoing

## 8. Monitoring Activity

### 8.1. Agreed Actions

8.1.1. Table 8-1 describes the required actions to implement the findings of the assessment.

8.1.2. The following activities and monitoring should be done at each occurrence of a scheme change or next PCF stage.

**Table 8-1 - Monitoring Actions**

Monitoring Action	Who	When
Liaison with the Applicant's Communications Team on information strategy and any consultation undertaken to ensure an accessible information and consultation approach is adopted, and any findings relevant to PCGs are included in this EqIA.	The Applicant's Equality Officer and Communication Team	Ongoing
Monitoring of approach to construction employment should be undertaken to maximise benefits to local unemployed / local workforce. This will be relevant from PCF Stage 4 onwards.	The Applicant's Project Manager and The Applicant's Equality Officer	Ongoing
Periodic reviews of the EqIA as the Scheme progresses (in line with above monitoring actions and any design changes, phases of work and new information relevant to the EqIA) to ensure all impacts are captured and mitigated where appropriate.	The Applicant's Equality Officer	Ongoing
Ongoing monitoring / recording of any mitigation. The ECI has been confirmed, but as the Scheme progresses. Including the anticipated pathways of mitigation pre-construction set out in Table 6-1, and this EqIA updated accordingly.	The Applicant's Project Manager and The Applicant's Equality Officer	Ongoing

## 9. Next Steps

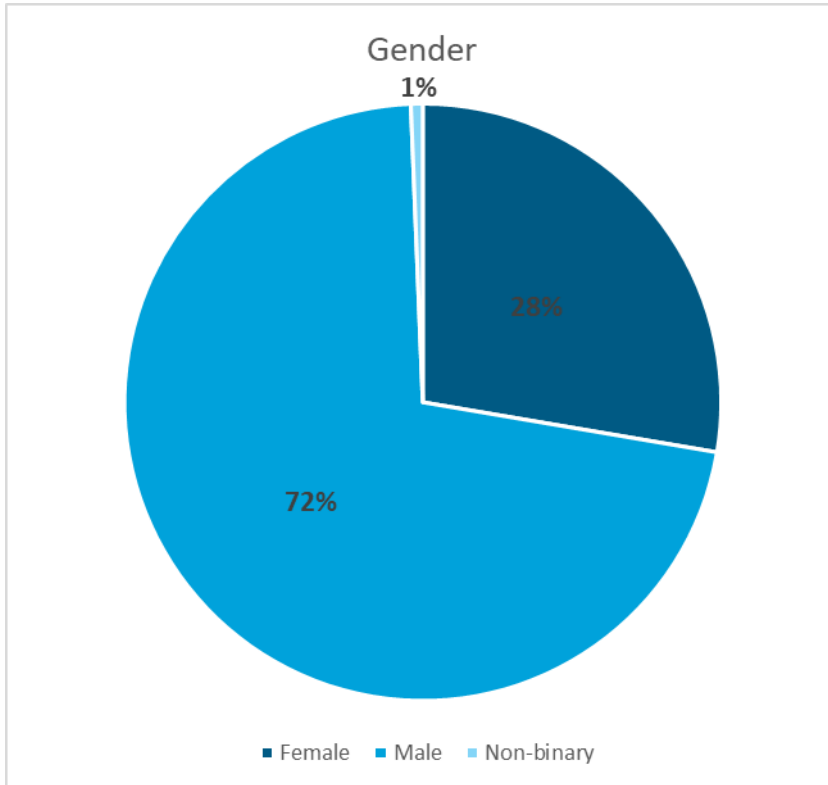
- 9.1.1. The EqIA will continue to be monitored throughout the Scheme life cycle and where necessary, updated to ensure all impacts are captured, allowing for suggesting and implementing any required mitigation.
- 9.1.2. This EqIA will be updated at Detailed Design, or if new information relevant to the EqIA becomes available.

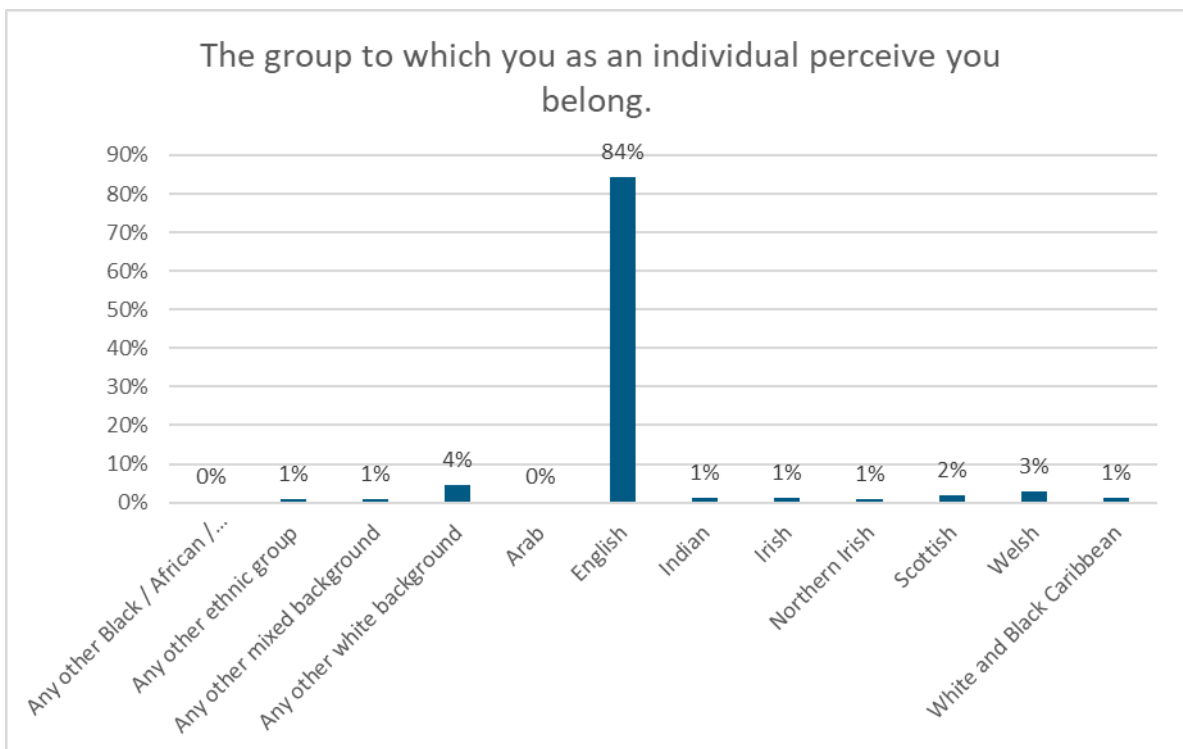
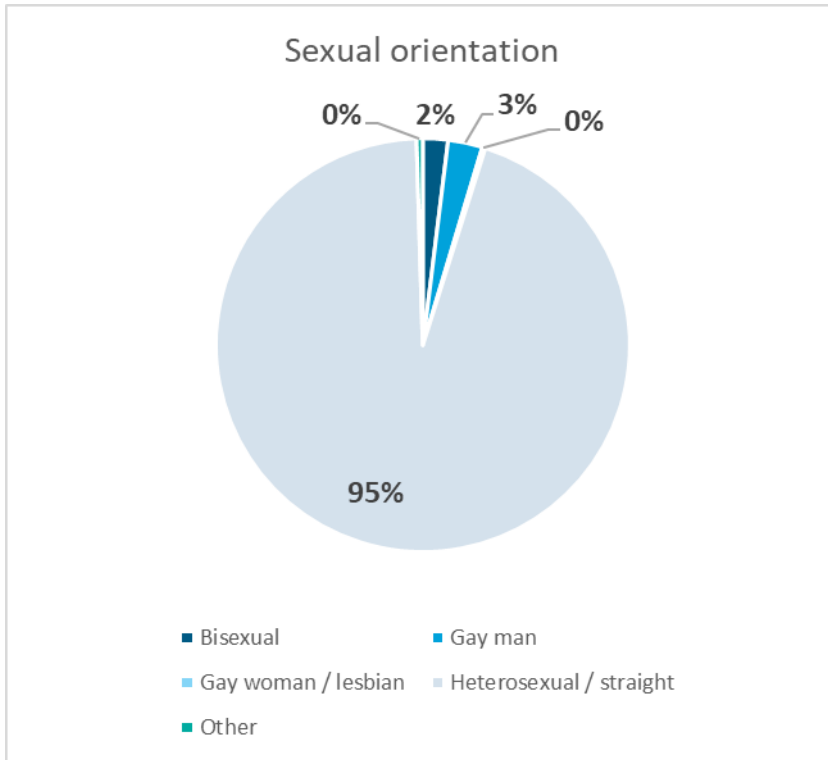


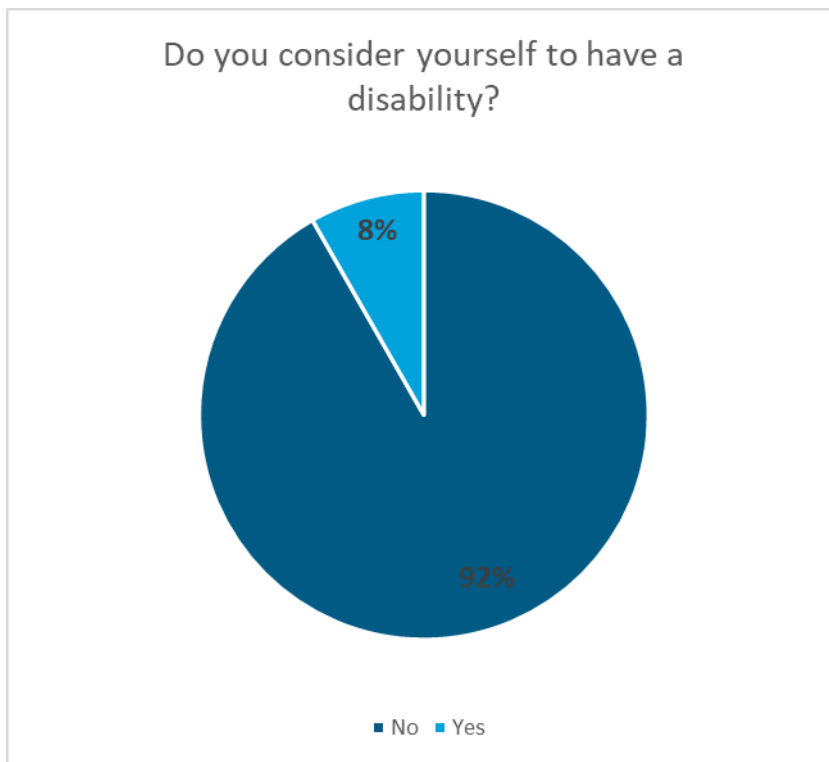
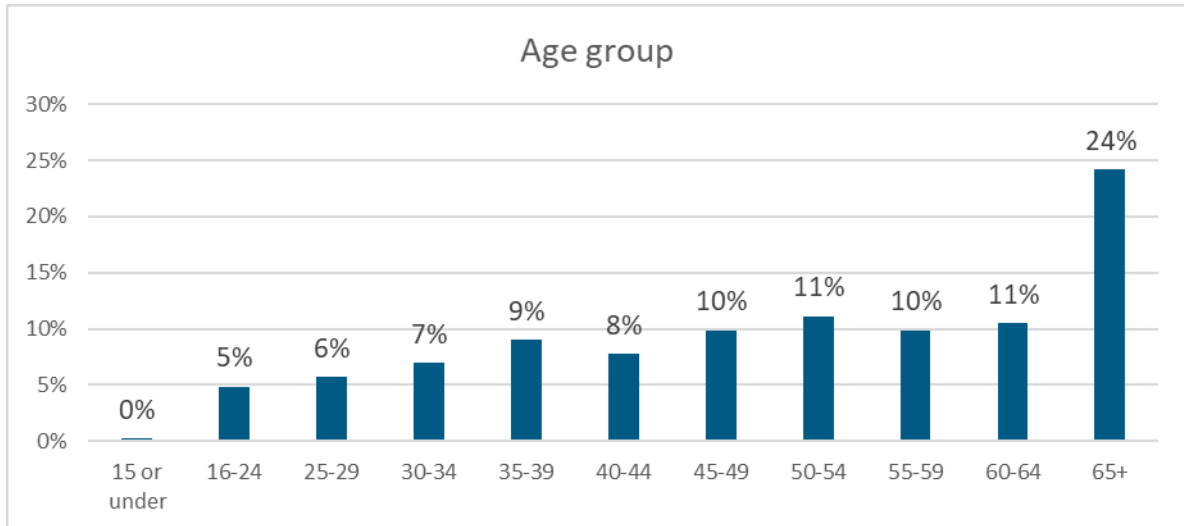
# Appendices

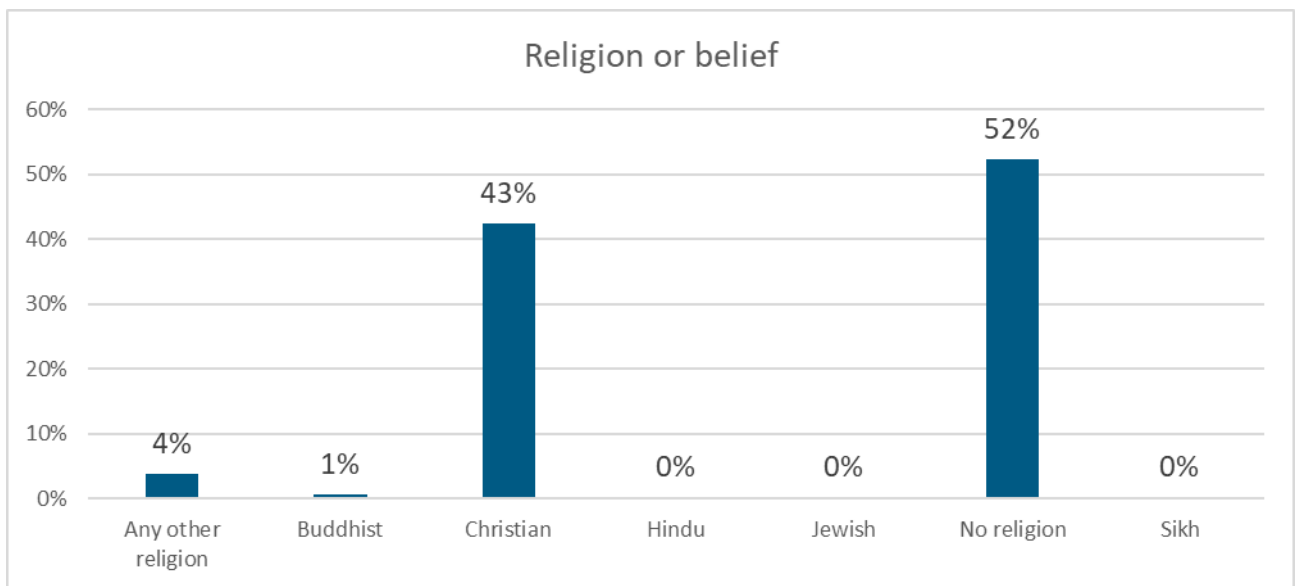
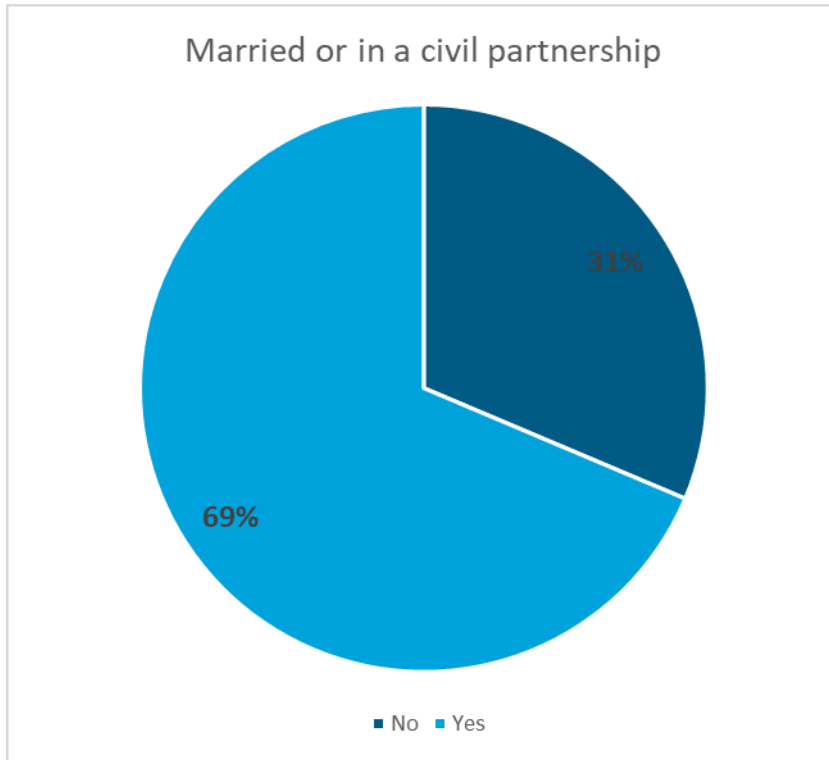


## Appendix A. Respondent demographics









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