

Equality Impact Assessment Form

1. Contact Details

Service/department/section:

Local Transport Improvements Team, Transport & Network Management, Highways, Transport & Planning, Place Services

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2. About the Policy, Procedure or Change

Title of Policy, Procedure or Change:

1. West Sussex Walking and Cycling Strategy 2016-2026 and
2. Draft West Sussex Local Cycling and Walking Infrastructure Plan 2023-2036 consultation

Briefly describe the purpose of the changes being made:

The West Sussex Walking & Cycling Strategy 2016-2026 has been updated in light of recent changes in government policy (e.g. publication of 'Gear Change – A bold vision for walking and cycling' in 2020) and to reflect the fact that a number of local authorities have since adopted Local Cycling and Walking Infrastructure Plans (LCWIPs) or are in the process of developing them. The strategy is to be renamed the West Sussex Active Travel Strategy 2023-2036 and will be referred to as such for the remainder of this EquIA.

The draft West Sussex Local Cycling and Walking Infrastructure Plan 2023-2036 (aka the West Sussex LCWIP), which sets out aspirations to improve six long-distance active travel corridors, has been designed to complement LCWIPs published by the district and borough councils, which set out aspirations for active travel networks in the larger urban areas.

The West Sussex Active Travel Strategy 2023-2036 and the West Sussex LCWIP are daughter documents of the West Sussex Transport Plan (WSTP) – a statutory document which was itself the subject of a review during 2021/22, with the final plan being adopted in April 2022.

The WSTP sets out the County Council's strategic approach to investment in, and management of, the transport network. In addition to the Active Travel Strategy and LCWIP the WSTP is supported by a series of thematic strategies such as the Bus Strategy, Rights of Way Management Plan and Highway Infrastructure Asset Management Plan which guide day-to-day operational matters. The WSTP builds upon three previous transport plans and the local plans prepared by the Local Planning Authorities that guide decision-making through the statutory planning system on the location and scale of development to meet identified needs.

Who do the changes apply to?

- ~~All Staff~~
- ~~Green book only~~
- ~~Grey book only~~
- Community/residents
- ~~Other (please state)~~

3. Data collection; consultation; and evidence

Background

The priorities set out in both the Active Travel Strategy and the West Sussex LCWIP are based on:

- Feedback from stakeholders who provided information about aspirational walking and cycling route improvements in 2015, which informed the West Sussex Walking and Cycling Strategy 2016-2026. The strategy was subject to a public consultation exercise and adopted in October 2016 and;
- Routes identified in LCWIPs produced by district and borough councils and the South Downs National Park following Department for Transport guidance. Five of the six routes identified in the West Sussex LCWIP feature in the Walking and Cycling Strategy 2016-2026, whilst the sixth has been identified as a priority in our Strategic Transport Infrastructure Programme.

Preparation of the WSTP was informed by an accompanying evidence base document which was published alongside the draft WSTP for consultation. It was also informed by a stakeholder survey undertaken during autumn 2020 inviting views on key issues and priority interventions for the WSTP review, as described below.

Previous engagement

Autumn 2020 WSTP survey approach

An on-line stakeholder survey was carried out for 6 weeks between 5th November and 17th December 2020, targeted at key stakeholders, including District and Borough and Town and Parish Councils, the South Downs National Park Authority, transport operators and representative groups, and environmental and local interest groups. The survey was publicised to key stakeholders on the West Sussex Transport Plan consultation database by email.

The survey was hosted on the previous West Sussex Have Your website and also publicised via a press release and the following weblink - www.westsussex.gov.uk/wstpsurvey to invite interested members of the public to respond.

Questions were included in the survey seeking views on the key transport issues and challenges facing West Sussex, including climate change, the local economy, accessibility, safety and health, and the environment. Questions also invited respondents to rank potential transport interventions in priority order and allowed responses to submit additional text comments.

The survey was also sent to contacts representing groups with protected characteristics, while questions were also included within the survey regarding these protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation) to help ensure the views from a range of people were being sought, as well as to help meet duties and the legal obligation under the Equality Act 2010.

There were 514 separate responses to the invitation to complete the survey, with 511 responses to the main survey, and 3 additional email responses. 368 responses were from individuals, and the remaining responses were from organisations or County, District or Borough, or Parish Councillors.

Key response themes

The highest scoring issues of importance reported in the survey were impacts of the transport network on the local and natural built environment, and greenhouse gas emissions from transport. The lowest scoring issues of importance were impacts of Covid-19 on the economy and travel behaviour, and digital connectivity.

The analysis also reported on the highest-ranking interventions across the different objective themes as summarised below:

- For Tackling Climate Change, the measure related to encouraging use of sustainable modes of transport stood out as the top scoring intervention.
- For Supporting the Local Economy, measures related to improving the quality of bus services to town centres and employment locations, improving rail service connectivity, and improving walking and cycling connections ranked highest.
- For Providing Access for All, a number of the interventions were similarly ranked, with the measures related to improving bus service coverage and improving the provision of services locally scoring most highly.
- For Improving Safety, Security and Health, giving higher priority to cycling and walking facilities ranked most highly.
- For Protecting the Environment and Quality of Life, the intervention related to protecting the landscape, biodiversity and green infrastructure, was the top scoring measure.

With regard to the open text comments submitted in response to the survey, the key themes relating to active travel in responses were:

- Frequent comments about cycling and walking investment, including comments for and against pop-up cycle lanes, which were installed during the Covid-19 pandemic in response to greatly reduced public transport capacity resulting from social distancing requirements.
- Many comments about public transport investment, including comments about the cost of public transport, rural accessibility concerns and comments about use of public transport in relation to the Covid-19 pandemic.

- Various comments on other themes, including lorry routing and traffic 'rat running' concerns, congestion comments linked to air pollution, road safety, electric vehicles and school run traffic.

Profile of respondents to the survey

With regard to the profile of individual respondents to the survey, key summary points to note were:

- There was a higher representation of older age groups, in particular from the 65-74 age group, and very low representation from age groups under the age of 35.
- There was a higher representation from male respondents as opposed to female respondents.
- Respondents were almost entirely white and held Christian or nonreligious beliefs.
- There were a small number of responses from respondents reporting disabilities.
- There were a mix of respondents reporting different relationship statuses, and a small number of responses from respondents reporting their sexual orientation as gay or lesbian, bisexual or other.

This profile of respondents shows that it is important that efforts to engage and understand the views of groups who were less well represented in the autumn 2020 survey are reviewed in planning consultation on the Active Travel Strategy and draft LCWIP. The Active Travel Strategy Review and LCWIP Communications Plan sets out the activities to be undertaken to address this issue.

Draft West Sussex Transport Plan consultation

A 6-week consultation is planned on the draft Active Travel Strategy and LCWIP from Day Date Month to Day Date Month 2023. A consultation survey is intended to be held on the county council's Your Voice consultation platform. This survey is intended to gather the views of key stakeholders including local business organisations, District and Borough Councils, neighbouring transport authorities, Parish Councils, the South Downs National Park Authority, local cycle forums, Councillors and organisations or groups representing those with protected characteristics. The survey is also proposed to be made publicly available for any interested party or member of the public to respond to.

The consultation will be publicised via email to the Local Transport Improvements Programme stakeholder consultation database of organisations and groups listed above. It is also proposed to share information about the consultation through the Your Voice ePanel eNewsletter, as well as with the voluntary and community sector through the WSCC Communities Team. The consultation will also be sent to contacts representing groups with protected characteristics, as set out in the Active Travel Strategy Review and LCWIP Communications Plan. A press release will be used to publicise the consultation supported by social media and website updates.

Considerations for groups with protected characteristics

Decisions about the provision of highways and transport services that involve the prioritisation of resources will need to be mindful of the potential positive and negative social effects. Transport infrastructure investments and behavioural change programmes will influence the ease with which people can access employment, education, health facilities, services, recreation and leisure. Investments in new transport infrastructure can improve quality of life, for example where this helps to address issues such as traffic rat running, or air quality and noise traffic issues in residential areas, but can also have negative social effects, for example where specific road user groups are affected by reallocation of road space to other modes.

With respect to potential effects on people with protected characteristics, the following provides a high-level summary of some known key issues in relation to accessing services, using the transport network, and impacts of the transport network on groups with protected characteristics, as well as on some other socio-economic groups. It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Age:**

A key barrier to mobility among children and young people is safety (and perceived safety) in relation to active travel choices. Recorded casualty numbers are highest in the 10-19 age band for both pedestrians and cyclists. The number of pedestrian casualties in this age band is 65% higher than the next highest band (20-29)¹.

Child obesity is a particular concern, as children living with obesity are more likely to become adults living with obesity and have a higher risk of morbidity, disability and premature mortality in adulthood². Inactivity due at least in part to travel choices, is a potential cause of obesity.

For older age groups, key considerations for transport planning are understood to include the design of streets and public realm not meeting older people's needs. A lack of active travel infrastructure can also contribute to isolation. In terms of safety, the number of reported pedestrian casualties broadly decreases with age. However, the number of fatalities is highest in the 70-79 and 80-89 age bands. The number of reported cyclist casualties remains at similarly high levels for the 10-19, 20-29, 30-39, 40-49, and 50-59 age groups. However, the number of fatalities is highest in the 20-29 and 40-49 age bands.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

¹ Sussex Police casualty data 2012-2022

² Childhood obesity: applying All Our Health Guidance, Public Health England, May 2020, <https://www.gov.uk/government/publications/childhood-obesity-applying-all-our-health/childhood-obesity-applying-all-our-health>, accessed March 2021

- **Disability:**

People with disabilities travel less and undertake journeys for different purposes compared with people without disabilities, although the population of people with disabilities is far from homogenous in its behaviour. While people with disabilities are less likely to ever walk or cycle or ever use public transport, compared with those without disabilities, those who experience difficulties with personal care or balance are particularly likely never to undertake these activities³. Considering the needs of people with disabilities in the design of transport infrastructure such as streets, crossings and public transport is critical to ensuring the transport network is accessible.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Gender (sex):**

A number of gender imbalances in transport planning have been identified, related to the historical prioritisation given to the car over other forms of transport⁴. Where households have a car, men tend to dominate access to it. While women are more likely to use public transport, this is typically not designed with the needs of the generally more complicated trip-changing travel patterns of women in mind associated with combining unpaid care work and accessing employment more frequently undertaken by women. Stark differences in the perception of danger between men and women after dark and in using public transport have also been identified, as well as an imbalance in that women make up only a fifth of transport sector employees in Europe, with the UK below the European average.

In 2021, men made more than triple the amount of cycle trips in the UK than women and cycled on average more than four times the distance⁵. This is reflected in West Sussex recorded casualty data with the figure for male casualties being more than three times higher than the figure for females.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

³ Disabled people's travel behaviour and attitudes to travel, Department for Transport, 2017, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647703/disabled-peoples-travel-behaviour-and-attitudes-to-travel.pdf

⁴ Mind the Gender Gap: The Hidden Data Gap in Transport, London Reconnections, October 2019, <https://www.londonreconnections.com/2019/mind-the-gender-gap-the-hidden-data-gap-in-transport/>

⁵ Walking and cycling statistics, England: 2021

<https://www.gov.uk/government/statistics/walking-and-cycling-statistics-england-2021>

- **Gender reassignment:**

As for other protected characteristics, hate crime based on gender identity is also known to be an issue affecting use of the transport network, in particular public transport. Infrastructure design and the use of technology are understood to be important in alleviating crime and fear of crime.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Marriage or civil partnership:**

There are no specific transport planning issues related to marriage/civil partnership identified through this EqIA.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Pregnancy and maternity:**

Key issues for transport access with respect to pregnancy/maternity are understood to include the accessibility of pre and post-natal support services, the design of streets and pavements, and the accessibility of public transport (which can potentially be improved through the provision of active travel infrastructure).

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Race:**

People from ethnic minorities are understood to be at a particular risk of transport poverty, along with young people not in education, employment or training, students, older people and women⁶. Shared transport is understood to not be popular with some ethnic minority groups due to fears of racism and harassment, while language difficulties can also be a particular barrier to public transport use⁷.

Research has found large differences in cycling participation, with people from ethnic minorities, along with woman, disabled people, older people and people from a more

⁶ Transport and inequality: An evidence review for the Department for Transport, NatCen, July 2019, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953951/Transport_and_inequality_report_document.pdf

⁷ Transport for Everyone: an action plan to promote equality, Department for Transport, December 2012, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/36212/equality-action-plan.doc

deprived areas, being less likely to cycle⁸. This is not because there is not demand, but because of barriers around cycle access and cost, harassment, decision makers not representing the diversity of residents, inadequate storage facilities, and infrastructure not serving the needs of all users.

For gypsy and traveller groups, poorly located sites with no easy access to roads or public transport can have a detrimental impact on the ability of residents to access employment, education, health, shopping and other facilities⁹.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Religion or belief (including no belief):**

As for other protected characteristics, hate crime based on religion or belief is also known to be an issue affecting use of the transport network, in particular public transport. Infrastructure design and the use of technology are understood to be important in alleviating crime and fear of crime.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Sexual Orientation:**

As for other protected characteristics, hate crime based on sexual orientation is also known to be an issue affecting use of the transport network, in particular public transport. Infrastructure design and the use of technology are understood to be important in alleviating crime and fear of crime.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Part time workers:**

Part time workers can face specific challenges with regard to transport access, including not being able to take advantage of season ticket discounts for public transport in the same way as full-time workers, and potentially needing to undertake more complex trip chains combining part-time work with other responsibilities making

⁸ Bike Life 2019 UK report, Cities for People, Sustrans,
https://www.sustrans.org.uk/media/5942/bikelife19_aggregatedreport.pdf

⁹ Designing Gypsy and Traveller Sites, Good Practice Guide, Department for Communities and Local Government, May 2008,
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf

use of public transport more challenging. The availability of active travel infrastructure may therefore be more important for this group in order to facilitate such journeys.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Caring responsibilities:**

Issues for carers centre around low incomes/higher transport costs as a result of their caring role, lack of accessible information, and a lack of awareness and provision for the need of travelling with companions. The provision of active travel infrastructure may therefore be more important for this group as a potential alternative to public transport for some trips.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Socio economic groups (e.g. unemployed; students;):**

Those who are unemployed or on low incomes tend to distrust the reliability of public transport and transport costs (public or private) and lack both the knowledge of the system and the confidence to travel. There are also affordability issues with car ownership for many low-income households, while lack of suitable transport provision can also reduce access to education and training opportunities¹⁰. The availability of active travel infrastructure may therefore be more important for this group in order to facilitate such journeys.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

- **Other socially excluded communities or groups (e.g. homeless):**

Rough sleepers are one of the most vulnerable groups in society, and suitable transport to enable access to employment and services is an important issue for this group.

Action required to mitigate/remove negative impact

It is expected that as individual active travel schemes emerge effects on people with protected characteristics will need to be considered as part of the development of

¹⁰ Inequalities in Mobility and Access in the UK Transport System, Government Office for Science, Foresight, March 2019
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf

those schemes. It is also expected that schemes will be designed in accordance with the latest relevant statutory and non-statutory guidance.

4. Summary and Progressing the Equality Duty

a) Is there an opportunity to use this policy, procedure or change to show we are working to progress any of part of the Public Sector Equality Duty?

Public Sector Equality Duty:

- Eliminate unlawful discrimination, harassment, and victimisation.
- Improve quality of opportunity between different protected groups.
- Foster good relations between different protected groups.

The Active Travel Strategy and LCWIP identify strategic priorities that benefit communities as a whole in West Sussex although they are not expected to have direct notable positive or negative implications relating to the above aspects of the Public Sector Equality Duty. However, these are important issues for the design of infrastructure that will emerge from strategic priorities. It is expected that Public Sector Equality Duty will need to be considered as part of the scheme development process.

b) Please provide a summary of the overall findings and rate your analysis.

- **Amber** – As a result of performing this analysis, it is evident a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing actions or control measures detailed in the action planning section of this document.

With respect to potential effects on people with protected characteristics, the high-level summary above has identified some known key issues in relation to accessing services, using the active travel/transport network, and effects of the network on groups with protected characteristics. It is expected that as individual schemes emerge effects on people with protected characteristics will need to be considered as part of the development of those schemes.

5. Action Planning

As a result of performing this analysis, what actions are proposed to remove or reduce any negative impact of adverse outcomes identified on people (employees, applicants, customers, members of the public, etc) who share characteristics protected by The Equality Act 2010 or are non-legislative characteristics ?

Identified Impact(s) on Protected Characteristic or local non-legislative factor(s):

During the autumn 2020 survey undertaken to inform the WSTP review, there was a higher representation of older age groups, and low representation from younger age group, a higher representation from male as opposed to female respondents, while respondents were almost entirely white and held Christian or nonreligious beliefs, so there was lower representation from some groups with protected characteristics.

With respect to potential effects on people with protected characteristics, the high-level summary above has identified some known key issues in relation to accessing services, using the active travel/transport network, and effects of the network on groups with protected characteristics.

Recommended Actions:

There are two specific actions identified for the purposes of the Active Travel Strategy and LCWIP consultation.

- (1) to ensure reasonable attempts are made to engage the views of individuals and/or groups covering the protected characteristics identified in this EqIA and identify any resultant mitigation measures related to these protected characteristics resulting from the consultation period.
- (2) to ensure that consultation information and related documentation is made available in alternative formats (different languages, larger print, audio, etc.) and publicised.

It is also expected that as individual schemes emerge in relation to the Active Travel Strategy and LCWIP effects on people with protected characteristics will need to be considered as part of the development of those schemes.

Responsible Lead Officer: Andy Ekinsmyth, Head of Transport and Network Operations

Last update: May 2023

Review date: Following consultation on the Active Travel Strategy 2023-2036 and draft West Sussex Local Cycling and Walking Infrastructure Plan 2023-2036