

# Equality Impact Assessment

1. Under s.149 of the Equality Act 2010, when making decisions, Epping District Council must have regard to the Public Sector Equality Duty, ie have due regard to:
  - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
  - advancing equality of opportunity between people who share a protected characteristic and those who do not,
  - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
  - age
  - disability
  - gender
  - gender reassignment
  - marriage/civil partnership
  - pregnancy/maternity
  - race
  - religion/belief
  - sexual orientation.
3. In addition to the above protected characteristics you should consider the cross-cutting elements of the proposed policy, namely the social, economic and environmental impact (including rurality) as part of this assessment. These cross-cutting elements are not a characteristic protected by law but are regarded as good practice to include.
4. The Equality Impact Assessment (EqIA) document should be used as a tool to test and analyse the nature and impact of either what we do or are planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. Use the questions in this document to record your findings. This should include the nature and extent of the impact on those likely to be affected by the proposed policy or change.
6. Where this EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. All **Cabinet, Council, and Portfolio Holder reports must be accompanied by an EqIA**. An EqIA should also be completed/reviewed at key stages of projects.
8. To assist you in completing this report, please ensure you read the guidance notes in the Equality Analysis Toolkit and refer to the following Factsheets:
  - Factsheet 1: Equality Profile of the Epping Forest District
  - Factsheet 2: Sources of information about equality protected characteristics
  - Factsheet 3: Glossary of equality related terms
  - Factsheet 4: Common misunderstandings about the Equality Duty
  - Factsheet 5: Frequently asked questions
  - Factsheet 6: Reporting equality analysis to a committee or other decision making body

## Section 1: Identifying details

Your function, service area and team: HGGT Liaison Lead, Implementation Team, Planning Service

If you are submitting this EqIA on behalf of another function, service area or team, specify the originating function, service area or team: Harlow and Gilston Garden Town Team

Title of policy or decision: Endorsement of the Harlow and Gilston Garden Town Transport Strategy

Officer completing the EqIA: Ione Braddick Tel: 01992564205 Email: ibraddick@eppingforesdc.gov.uk

Date of completing the assessment: 20/10/2021

## Section 2: Policy to be analysed

2.1 Is this a new policy (or decision) or a change to an existing policy, practice or project? A new policy (or decision)

2.2 Describe the main aims, objectives and purpose of the policy (or decision):

Finalise the HGGT Transport Strategy and its proposed actions, with endorsement from the three partner District Council Cabinets and two partner County Council portfolio holders. Build support and collaborative opportunities to help move forward with implementing the strategy.

This Strategy builds on the work of the HGGT Vision. It was prepared by AECOM on behalf of the Garden Town and reported to the Garden Town Board on 4th February 2019. It was then reported to the Cabinet and Executive meetings of the District Council partners as follows:

- East Herts District Council: Executive Meeting: 26 February 2019
- Epping Forest District Council: Cabinet Meeting: 7 March 2019
- Harlow District Council: Cabinet Meeting: 28 February 2019

The draft HGGT Transport Strategy has gone through a statutory consultation process over 2020 to engage stakeholders and public views through an online survey, social media polls, and a series of consultation events.

All of the District Council partners endorsed the draft Transport Strategy for consultation. It was also resolved that the final Transport Strategy will be agreed as a material planning consideration for the preparation of masterplans, the preparation of the Gilston Area Charter, pre-application advice, assessing planning applications and any other development management purposes.

The Transport Strategy sets out the following objective:

50% of all trips starting and/or ending in the existing settlement area of Harlow Town should be by active and sustainable travel modes and 60% of all trips starting and/or ending in the new Garden Communities of Harlow & Gilston Garden Town should be by active and sustainable travel modes.

The Objective is underpinned by the application of three Principles:

- A user hierarchy – prioritising active and sustainable travel – walking, cycling and public transport.
- Supporting a culture of active and sustainable travel – an environment where active and sustainable travel is valued, prioritised, and supported to ensure that their social,

	<p>environmental, health and economic benefits are available to everyone.</p> <ul style="list-style-type: none"> <li>• Accessible and inclusive – providing a sustainable, accessible and affordable transport system that reduces congestion, improves public health outcomes, and is designed with consideration of those with most need first.</li> </ul> <p>What outcome(s) are you hoping to achieve (ie decommissioning or commissioning a service)?</p>
2.3	<p>Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> <li>• service users</li> <li>• employees</li> <li>• the wider community or groups of people, particularly where there are areas of known inequalities?</li> </ul> <p>All of the above.</p> <p>Will the policy or decision influence how organisations operate? Yes</p>
2.4	<p>Will the policy or decision involve substantial changes in resources? Yes</p>
2.5	<p>Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes? Yes, it builds on the Harlow and Gilston Garden Town Vision, and the Council's emerging Local Plan, particularly policies regarding the Garden Town and Sustainable Mobility.</p>

## Section 3: Evidence/data about the user population and consultation<sup>1</sup>

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.1	<p>What does the information tell you about those groups identified?</p> <p>The key stakeholders and target groups are broad and far-reaching. They span two county councils (Herts and Essex), and three district councils (East Herts, Epping and Harlow). It includes both councillors/politicians and members of the public, so needs to be accessible and easy to digest. The Transport Strategy aims to increase accessibility and social equity in Harlow and new Garden Communities, so comprehensive engagement was a vital piece of work to ensure it meets its key objectives, as well as those of the HGGT Vision. We particularly welcomed input from a diverse range of demographics, particularly individuals and groups with protected characteristics.</p> <p>The consultation was initially physically presented (either at manned or unmanned stands) in East Herts, Harlow and Epping District Councils alongside an online summary note, and a survey, between February and March 2020. It was then taken to the board in September 2020 to request additional time for further consultation to increase both the number and diversity of responses. Key areas that needed addressing included:</p> <ul style="list-style-type: none"> <li>• Responses from younger people</li> <li>• Responses from businesses</li> <li>• Responses from charity and third sector</li> <li>• Greater engagement generally among Harlow residents</li> </ul> <p>Questions and issues that needed addressing further were:</p> <ul style="list-style-type: none"> <li>• Evidence of extent of support for the Transport Strategy</li> <li>• Areas for change needed in Transport Strategy</li> <li>• Suggestions for improvement across town (local knowledge)</li> <li>• Current travel behaviours</li> <li>• Measures to encourage modal shift</li> </ul>
3.2	<p>Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision?</p> <p>Yes</p> <p>First Round:</p> <p>The statutory Transport Strategy Consultation on the draft document – which had the headline ‘Getting Around the Garden Town’ – commenced in February 2020. Full information was provided on the Garden Town website and was publicised across social media, via public notices on bus stops and in prominent locations, and through issue of a</p>

press release. All partner Councils were asked to publicise the consultation on their websites and redirect those interested to the Garden Town website for full details. All stakeholders were approached for their views, including through public events. Responses were invited online, through the use of a questionnaire/feedback form. The same arrangements were also in place at the consultation events, where officers invited those attending to take away and complete questionnaires or directed attendees to the website.

Unattended consultation events had the same material available. Social media coverage directed respondents to the website for online submissions. Respondents were invited to identify whether they are responding personally on behalf of an organisation. Appropriate data collection arrangements were in place and respondents were informed of the way in which their data will be stored and handled.

#### Consultation Events:

- Harvey Centre, Harlow Town Centre - Presentation material available. Officers present
- to answer questions and hand out material
- East Herts Offices - Unmanned exhibition with publicity material available - with leaflet
- to takeaway
- Epping Forest Offices - Presentation material available. Officers present to answer questions and hand out material
- East Herts Member Event (with possible open invitation to wider GT Members)
- Sustainable Travel talk by John Dales of Urban Movement
- Partner Councils - Member Briefing events (EHDC 27 Feb, EFDC 9<sup>th</sup> Mar, HDC 11 Mar)
- East Herts PCs - Hunsdon, Gilston and Eastwick, High Wych
- Hunsdon, Gilston and Eastwick NPG meeting 8<sup>th</sup> Feb - Presentation and QA
- Epping Forest PCs - Presentation and QA
- Chamber of Commerce 19<sup>th</sup> Feb - Presentation and QA

#### Second Round:

Due to the Covid-19 pandemic, everything after February 2020 took place virtually in all instances. The general Harlow public were engaged through social media platforms as well as 7 online workshops to engage further with selected stakeholders and officers.

#### Consultation Events (INTERNAL):

These workshops comprised a pre-prepared presentation and discussion session. Information was sent around in advance with a guide on what to focus on. The workshops looked to engage specialists from within the partner authorities and among external stakeholders to input on the Strategy.

The purpose of the specialist workshops was to identify any gaps or upcoming alignments with wider work, case studies etc, and to gather focused feedback on specific sections/pages. It was also important to note how the actions/objectives could help the district/county partners achieve their objectives.

- Studies/notes to consider (not exhaustive):

- ITP mode share definition

- Bike Hire/Car Share note
- Gilston – Development Specification and Masterplanning
- Content of Healthy Town Framework
- Sustainability Guidance
- Content of Gear Change – LTN 01/20
- Climate Change Agenda
- Conformity Checks:
- Hertfordshire Local Transport Plan 4
- Essex County Council Local Transport Plan 3
- East Herts Local Plan – October 2018
- Harlow Local Plan and Main Mods –
- Epping Forest Local Plan submission document and modifications –
- Other approved policy/strategy documents

Internal workshops:

- Public Transport Workshop, 4th Nov
- Active Travel Workshop - 4th Nov
- Road Management Workshop - 4th November
- Planning and Technology Workshop - 4th November

Consultation Events (EXTERNAL):

The purpose of the meetings/workshops were two-fold: to increase awareness of HGGT and Transport Strategy and to seek organisation views and priorities on transport and compare with existing consultation results.

- Harlow College 5<sup>th</sup> Nov
- Harlow Youth Council 16<sup>th</sup> Nov/18<sup>th</sup> Jan
- Epping Youth Council 10<sup>th</sup> Nov/26<sup>th</sup> Jan
- Harlow Growth Board 25<sup>th</sup> Sept
- Developer Forum
- Business Sector 27<sup>th</sup> Oct - Presentation and QA
- Discover Harlow
- Harlow Chambers
- Harlow ED's business database
- Charity, voluntary & community services 26<sup>th</sup> Oct - Presentation and QA
- Rainbow Services
- United in Kind
- HEMU
- St Clare Hospice
- Hub and Spoke
- PACT
- Carers First
- Community Farm
- Ramblers
- Civic Society
- Civic Society
- Harlow Area Access Group

Social Media:

A social media campaign through both Facebook and Twitter relied on a series of mini polls.

	<p>They asked one question combined with an image and link to further information. These questions aligned with questions 1 and 3 from the initial consultation survey which focused specifically on the Strategy itself.</p> <ul style="list-style-type: none"> <li>• Q1: To what extent do you support the Transport Strategy’s action plan? (8 questions)</li> <li>• Q3: To what extent do you support the following objectives for mobility in the GardenTown? (3 questions)</li> </ul> <p>The questions were broken down to address all elements resulting in 11 questions in total. This method had the following benefits:</p> <ul style="list-style-type: none"> <li>• Engaging people in the Transport Strategy and additional HGGT work</li> <li>• Providing a larger number of responses than could be obtained through longer surveys</li> <li>• and increasing and increasing the reach of these</li> <li>• Acting as a signpost to further content and extended survey if the resident is interested</li> <li>• Increasing HGGT social media audiences</li> </ul> <p>It is noted that although we received a high number of poll responses, the platforms don’t support more in-depth and considered responses (comments were left on the social media posts however). This was addressed by links to further content and the opportunity to provide more substantive answers via the survey, which proved to be hugely successful. A further risk was that these polls could not be anonymised, and this could have deterred voters. Lastly, this strategy is entirely digital which excluded those not able to access the internet. Whilst this resulted in a larger number of responses from younger residents (which were a focus area due to lack of engagement in the first round) measures have been considered to ensure it didn’t exclude older residents.</p> <p>Following a period of redrafting in order to take account of feedback, the finalised document has been presented to relevant stakeholders for final signoff. Any respondents are protected by Epping Forest District Council's privacy policy, which can be found here: <a href="http://harlowandgilstongardentown.co.uk/privacy-policy">http://harlowandgilstongardentown.co.uk/privacy-policy</a></p>
3.3	<p>If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary:</p> <p>The HGGT team are also engaging on other pieces of work around the same time as the Transport Strategy. Thought has been given to how these can work in harmony and not cause confusion or ‘consultation fatigue’.</p> <ul style="list-style-type: none"> <li>• LCWIP</li> <li>• STCs</li> <li>• Relevant Planning Applications</li> </ul>

## Section 4: Impact of policy or decision

Use this section to assess any potential impact on equality groups based on what you now know.

Description of impact	Nature of impact Positive, neutral, adverse (explain why)	Extent of impact Low, medium, high (use L, M or H)
Age	<p>Positive</p> <p>The consultation reaffirmed the Strategy's Objectives and Actions with regards to this protected characteristic. All ages will be encouraged to access future public consultation events which aim to broaden access. Age does sometimes act as a barrier to online engagement, so printed material will be available.</p> <p>Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• Younger and older people are less likely to have access to a car and are therefore dependent on public and sustainable modes. Dedicated cycle lanes make it safer and easier for children to cycle to school.</li> <li>• E-bikes provide an opportunity to get older people cycling.</li> <li>• Covid-19 may be having a disproportionate effect on the vulnerable, by discouraging them from travelling at the busiest times of day.</li> <li>• Enable people to access public transport to advance equality of opportunity.</li> <li>• Seek opportunities to reallocate road space to facilitate active travel and support physical distancing.</li> </ul>	M

<p>Disability</p>	<p>Positive</p> <p>The consultation reaffirmed the Strategy’s Objectives and Actions with regards to this protected characteristic. However, it was noted in the Strategy that accessibility and inclusion was not given the focus it should have. In this regard the Strategy was adapted to include accessibility and inclusion as a specific Principle and each Action within the Strategy had a section detailing the impacts/links on accessibility and inclusion issues. The strategy is designed to improve accessibility and encourage inclusivity for any physical or mental impairment.</p> <p>The councils can provide a text relay service for people who are deaf, hearing impaired or have a speech impediment.</p> <p>The relevant council offices have audio induction loops, and can arrange a British Sign Language (BSL) interpreter if notice is given.</p> <p>HGGT have committed to meet accessibility standards for all new PDFs or Word documents published from 11th November 2019 onwards. Assessments are carried out in line with the Web Content Accessibility Guidelines (WCAG) 2.1 A and AA criteria.</p> <p>The Transport Strategy comes under a non-HTML document, so HGGT will ensure it is accessible, and provide accessible alternatives where applicable. The regulations don’t require us to fix PDFs or other documents published before 23 September 2018, if they’re not essential to providing services, so this may relate to external links embedded in the Strategy.</p> <p><a href="https://www.accessibility-services.co.uk/certificates/harlow-andgilston-garden-town/">https://www.accessibility-services.co.uk/certificates/harlow-andgilston-garden-town/</a></p> <p>If respondents need information on the Strategy in a different format like accessible PDF, large print, easy read, audio recording or braille, it is possible for the team to discuss alternative arrangements with Officers or the ECC Equalities and Partnerships Team at <a href="mailto:ECC.Equalities@essex.gov.uk">ECC.Equalities@essex.gov.uk</a>.</p> <p>Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• Blue badge parking.</li> <li>• A need for better cycle parking for adapted bikes used by disabled people.</li> <li>• Obstructions on the highway and footway (e.g. A-boards and tree routes) are particular issues for disabled road users.</li> </ul>	<p>M</p>
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	<ul style="list-style-type: none"><li>• Physical distancing rules and the need for more personal protection may make it difficult for carers and disabled people concessionary travel schemes</li><li>• Reduce, as far as possible, any physical barriers as part of transport changes that would create accessibility issues for wheelchair users and people with mobility impairments e.g. ensuring footway extensions are flush to the existing infrastructure and dropped kerbs are provided where appropriate.</li><li>• Ensure temporary barriers and signs do not cause obstructions on the pavement</li><li>• Incorporate accessible crossings into temporary measures wherever possible</li><li>• Share information about the changes with local representative groups for wider dissemination</li><li>• Maximise the width of new and existing cycle infrastructure where possible to ensure they are accessible to all types of adapted cycles with appropriate dropped kerbs for easy access.</li><li>• Ensure light segregation on temporary cycle lanes has breaks of sufficient width to allow access for larger adapted cycles and that barriers are of a suitable height not to impede sightlines.</li></ul>	
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Gender	<p>Positive The consultation reaffirmed the Strategy's Objectives and Actions with regards to this protected characteristic. Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• There are studies that reveal that there are gender disparities in travel behaviours.</li> <li>• Women are more likely to use the transport network during lockdown as key workers.</li> <li>• Women are more likely to be travelling on the network with family members, as primary carers.</li> <li>• Safety is a key concern. Ensure Action Plan measures consider safety and inclusivity</li> </ul>	M
Gender reassignment	<p>Positive The consultation reaffirmed the Strategy's Objectives and Actions with regards to this protected characteristic. Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• There are studies that reveal that there are gender disparities in travel behaviours.</li> <li>• Safety is a key concern. Ensure Action Plan measures consider safety and inclusivity.</li> </ul>	M
Marriage/civil partnership	<p>Positive The consultation reaffirmed the Strategy's Objectives and Actions with regards to this protected characteristic. Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• Lockdown restrictions may have a disproportionate impact on lone parents as safe transport options are more limited / they have to change the way or times that they usually travel.</li> <li>• Ensure changes are designed with family travel in mind, e.g. space and safety</li> </ul>	L
Pregnancy/maternity	<p>Positive The consultation reaffirmed the Strategy's Objectives and Actions with regards to this protected characteristic. Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• Cycle lanes should be wide enough to accommodate cycles with child trailers/tagalongs</li> <li>• Dedicated cycle lanes make is safer and easier to cycle with children</li> <li>• A significant number of people may need / choose to travel as part of a family unit</li> <li>• Ensure changes are designed with family travel in mind, e.g. space and safety</li> </ul>	

	<ul style="list-style-type: none"> <li>• Ensure detail of changes to the transport network is published publicly, so people are aware of what the council is doing and can plan their journeys accordingly</li> </ul>	
Race	<p>Positive</p> <p>The consultation reaffirmed the Strategy's Objectives and Actions with regards to this protected characteristic. Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• BAME people are more likely to be in roles where travel to work is unavoidable and where they are unable to change their working hours to travel at less busy times.</li> <li>• BAME people are more likely to use the transport network during lockdown as key workers.</li> <li>• People who do not speak / have poor English may struggle to access information about transport changes.</li> <li>• BAME groups are more likely to have limited access to private amenity space for exercise.</li> <li>• Ensure interpreting services are available to support customers whose first language is not English.</li> <li>• Share information about the transport changes with local groups for wider dissemination to different communities.</li> </ul>	L
Religion/belief	<p>The consultation reaffirmed the Strategy's Objectives and Actions with regards to this protected characteristic. A significant portion of the population may wish to travel to places of worship and/or to congregate / travel for religious ceremonies (e.g. burials) / events / festivals. Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• Ensure Action Plan measures include a focus on facilitating safe mass gatherings.</li> <li>• Ensure there is sufficient pavement space near places of worship for pedestrians to physically distance when they gather.</li> </ul>	L
Sexual orientation	<p>Positive</p> <p>The consultation reaffirmed the Strategy's Objectives and Actions with regards to this protected characteristic. Strategy considerations include:</p> <ul style="list-style-type: none"> <li>• mass gatherings / events / festivals that would affect traffic in the city and increase visitor numbers</li> <li>• Ensure Action Plan measures consider safety and inclusivity</li> </ul>	L

## Section 5: Conclusion

		Tick Yes/No as appropriate	
5.1	Does the EqIA in Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	No <input checked="" type="checkbox"/>	
		Yes <input type="checkbox"/>	If ' <b>YES</b> ', use the action plan at <b>Section 6</b> to describe the adverse impacts and what mitigating actions you could put in place.

## Section 6: Action plan to address and monitor adverse impacts

What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.

**Section 7: Sign off**

**I confirm that this initial analysis has been completed appropriately.  
(A typed signature is sufficient.)**

Signature of Head of Service: Nigel Richardson

Date:

Signature of person completing the EqlA: Ione Braddick

Date: 20/10/21

**Advice**

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqlA you undertake to the director responsible for the service area. Retain a copy of this EqlA for your records. If this EqlA relates to a continuing project, ensure this document is kept under review and updated, eg after a consultation has been undertaken.