

EXETER CITY COUNCIL

EQUALITIES IMPACT ASSESSMENT (EQIA)

SUSTAINABLE TRANSPORT SUPPLEMENTARY PLANNING DOCUMENT

1 INTRODUCTION AND BACKGROUND

- 1.1 This EQIA relates to a Supplementary Planning Document (SPD) regarding Sustainable Transport. Both the SPD and EQIA have been prepared by the Projects and Business Manager.
- 1.2 The Council is in the process of producing a Local Development Framework (LDF) which, once complete, will supersede the Exeter Local Plan First Review, adopted in 2005. The LDF comprises a suite of planning policy documents, divided into:-
- Development Plan Documents (DPDs) such as the Core Strategy, adopted in February 2012, which contains strategic policies, and the Site Allocations and Development Management DPD which is currently open for consultation; and
 - Supplementary Planning Documents (SPDs) which are not subject to independent examination but will have full public consultation, an example being the Residential Design SPD adopted in September 2010.
- 1.3 The Sustainable Transport SPD is one of the latter, it therefore amplifies policies in the Local Plan, Core Strategy and other DPDs rather than creating its own policy framework. The Core Strategy has been subject to its own EQIA¹. This highlighted a number of equalities issues relevant to transport, which the Core Strategy policies were designed to address:-
- 1.3.1 The need to control phasing of development and secure the timely provision of associated infrastructure.
- 1.3.2 The need to improve public transport, and direct development to locations well served by it.
- 1.3.3 The need to identify other necessary transport infrastructure and ensure that it is provided.
- 1.4 All of the above have a number of objectives, including reducing congestion and carbon emissions and improving air quality, but are also intended to minimise any disadvantage to particular members of society. The more detailed content of the proposed SPD goes further in this regard.

2 THE PROCESS

- 2.1 The first iteration of this EQIA considered a draft of the SPD which had been produced in consultation with colleagues at the City Council and Devon County Council. This draft of the SPD was to be used in the subsequent public consultation. Production of the EQIA highlighted the need for a few changes, which were made to the draft document:-

¹ See <http://www.exeter.gov.uk/index.aspx?articleid=12681&listid=9163>.

- Additional reference to location of cycle stores being such that users feel safe accessing them (paragraph 5.3.1).
 - Clarification that car parking standards for people with disabilities are minimum requirements (paragraphs 6.2.2 and 6.2.3 and Table 4).
 - Discussion with Devon County Council about including advice on providing alternative formats in their guidance on travel packs (Chapter 8).
- 2.2 The draft was then approved by the Council's Executive, and was the subject of a public consultation. As well as the public and bodies specifically interested in transport, organisations invited to comment included a wide variety of organisations representing people with different needs and characteristics, for example related to their age, faith or disability. In this way the document was brought to the attention of as many people as possible, not limited to those having a protected characteristic under the Equality Act, but everyone for whom the Council's Comprehensive Equality Scheme seeks equal treatment.
- 2.3 Following that consultation, representations were analysed, and where appropriate amendments were made to the draft SPD.
- 2.4 The final draft of the SPD is being presented to the Council's Executive on 19 March 2013 with a view to being adopted as part of Exeter's Local Development Framework.

3 CONTENT OF THE SPD AND IMPACTS ON PEOPLE

- 3.1 The SPD takes the form of a practice manual, setting out the type of development to which each chapter applies and the relevant policies in the Local Plan or elsewhere in the LDF. Chapters 1 to 3 set the general policy context, with the subsequent policy chapters (Chapter 4 onwards) being designed so that the earlier ones apply to all development including the smallest applications, whereas later chapters apply to progressively larger schemes. This is explained in Table 1 on Page 3, and means that applicants with minor proposals can stop reading at the appropriate point. Each chapter also contains, where relevant, a checklist for applicants, and conditions and planning obligations which are likely to apply.
- 3.2 While it is not practical to summarise the whole document in this report, the following paragraphs highlight some points of particular relevance to equality issues, as set out in the original EQIA. Where appropriate, these have been updated to include issues raised during the public consultation.
- 3.3 **Chapter 4 - Access and facilities for people with disabilities** precedes the other policy chapters, because it is relevant in part to virtually all development, however small. It summarises a number of transport and access needs relevant to people with a variety of disabilities, some of which are expanded upon in subsequent chapters. It is intended as a concise yet comprehensive summary of requirements, including those in other policy documents and legislation. It is intended to have a **positive** impact on people with disabilities, and is not anticipated to have any negative impacts. In addition, items such as seating² can benefit people who find it difficult to stand or walk for prolonged periods without resting.

² See para 4.1.1 of the SPD, sixth bullet.

- 3.4 Two respondents commented on this chapter during the public consultation. One felt that the bullet points in paragraph 4.1.1 should contain more specific references to the needs of visually impaired people, and these have now been included. The other pointed out that Exeter is hilly and it may not always be possible to meet best practice requirement for gradients; therefore a common sense approach should be used, including reasonable measures to accommodate all people. This point has also been included in the final draft.
- 3.5 **Chapter 5 - Parking and other facilities for cyclists** is concerned with on-site facilities such as parking and showers, rather than where cyclists are allowed to ride. The requirement for cycle parking to be secure and overlooked³ will have a **positive** impact on users who are or perceive themselves to be vulnerable. The encouragement of cycling, a low cost travel mode, has a **positive** impact on people on lower incomes which, although not a protected characteristic in the Equality Act, falls within the scope of the Council's Comprehensive Equality Scheme⁴.
- 3.6 None of the consultation responses on this chapter specifically related to equality issues.
- 3.7 **Chapter 6 - Car parking** includes car parking standards for disabled users, and is therefore intended to have a **positive** impact on them. More generally, the requirement for parking areas to be well overlooked will have a **positive** impact on vulnerable and other users.
- 3.8 Several of the consultation responses on this chapter related to equality issues. One respondent commented on the need for some parking spaces for disabled users to be wider than normal, that there need to be walkways between parking spaces, and that taxis need to be able to get close to the entrance to premises, to assist customers with disabilities. Minor amendments have been made to include all these points. Concern was also expressed that Devon County Council's Residents' parking system needed to remain accessible to people who don't use the internet; while outside the scope of a planning policy document, this has been raised with DCC who have confirmed that the service will remain available through their Customer Service Centre and by telephone.
- 3.9 **Chapter 7 - Connections between the site and its surroundings** deals with proposals that require existing infrastructure to be altered, for example to form or close an access, where the safety and convenience of all road users, including pedestrians and cyclists, needs to be considered. It points out that providing more than one access to a site for pedestrians and cyclists can encourage use of those modes by reducing travel distances. Both of these objectives should have a **positive** impact on people who find walking difficult, by minimising interference with walking routes, and keeping distances to a minimum. The measures in this and other chapters to promote the low cost modes of walking and cycling will collectively have a **positive** impact on people on lower incomes.
- 3.10 One respondent to the consultation highlighted the need to inform visually impaired people when pedestrian routes were going to change as a result of development. While outside the scope of a planning policy document,

³ See for example para 5.4 of the SPD, penultimate bullet.

⁴ Which promotes equality based on social origin, property and other status.

discussions are taking place with DCC about how this could be addressed through liaison with relevant groups.

- 3.11 **Chapter 8 - Travel plans and travel packs** has been prepared in close consultation with Devon County Council, who have specific requirements in this regard. Discounted cycle purchase schemes and season tickets can make travel more affordable and have a **positive** impact on people on lower incomes, especially those unable to afford the cost of running a car, or unable to drive one.
- 3.12 Travel packs could have a **negative** impact on people who have difficulty reading them, whether because of their sight, reading ability, or lack of understanding of English. This has been discussed with Devon County Council; to date their role has been reactive in that they have either approved or rejected travel packs compiled by developers, although they are intending to produce a toolkit to assist in production of travel packs, in which they will refer to the need to make them available in different formats if required. This provides an opportunity to mitigate the negative impact and even replace it with a positive one.
- 3.13 No further equality issues were raised during the public consultation.
- 3.14 **Chapter 9 – Off-site improvements** applies to developments whose impact is such that they are required to make a financial contribution towards improving transport infrastructure or services. By enabling the provision and improvement of walking and cycling routes, public and community transport, this increases the travel options for all users, thereby having a **positive** impact on many members of society, including those with disabilities, those on low incomes, and those too young or old to drive a car.
- 3.15 The chapter includes references to public transport, which prompted one consultee to respond that electronic information systems should include audio as a matter of course. One of the amendments made to paragraph 4.1.1 (see 3.4 above) is to say that such systems should, wherever practicable, be easy for all disabled users to locate and use; however, it would not be possible to require audio as a mandatory planning requirement.
- 3.16 **Chapter 10 – On-site movement networks** applies to developments that are large enough to have roads and/or paths within the site. It aims to ensure that layouts cater not only for cars, but provide safe and convenient routes and crossing points for pedestrians and cyclists, as well as roads capable of accommodating buses where appropriate.
- 3.17 This generally has the same **positive** impact as identified in relation to Chapter 9, although it is an appropriate point to mention that combined pedestrian and cycle routes may, if poorly designed and inconsiderately used, have a **negative** impact on some users, particularly pedestrians with poor mobility, sight or hearing who have difficulty detecting the presence of cyclists, leading to anxiety or even injury. A comment was received to this effect during the public consultation.
- 3.18 This negative impact can be mitigated by reducing the speed of cyclists and this SPD⁵ repeats advice in the Residential Design SPD that this should be

⁵ At paragraph 10.2.7, last bullet.

achieved by design features (such as alignment) rather than obstructions such as barriers or railings which have their own negative impact on users with pushchairs, wheelchairs and buggies. In the case of inconsiderate behaviour by cyclists, Devon County Council is currently running a campaign to promote tolerance between different categories of road and path users. In terms of the SPD, it encourages well designed facilities, the effect of which should be to encourage cyclists to ride where intended; for example, a road that is safe to cycle on will discourage cycling on an adjoining footway that is not intended for that purpose. It should also be recognised that many facilities designed principally for cyclists, such as off-road routes and toucan crossings, are also useful to those with pushchairs, wheelchairs and buggies.

- 3.19 Chapter 10 also refers⁶ to the need to phase larger developments so that areas nearest to existing infrastructure are developed first, picking up the issue highlighted in the EQIA of the Core Strategy and referred to in paragraph 1.3.1 above.
- 3.20 One respondent to the consultation highlighted the need for safe walking and cycling routes for school, not only to reduce risks to young people, but also to influence their future travel behaviour. Reference to routes to school has now been included in paragraph 10.2.6 of the SPD, and paragraph 8.1.1 has been extended to include a requirement for travel plans for new and extended schools.
- 3.21 **Chapter 11 – Car clubs** is intended to supersede the current Supplementary Planning Guidance on the subject, updating the financial and other details, and extending the concept from car-free city centre sites to larger development areas where a car club might form part of a package of sustainable travel measures. Car clubs are more affordable than owning a car and this chapter is anticipated to have a **positive** impact on people on lower incomes. No comments regarding equality issues were received during the public consultation.
- 3.22 **Chapter 12 – Significant transport proposals** includes for completeness a summary of such projects, including the Devon Metro package of rail improvements and plans for the bus, road and park and ride networks. Enhancing transport systems and promoting the use of sustainable modes will have a **positive** impact on a wide range of people, as identified in relation to previous chapters. No comments regarding equality issues were received during the public consultation.

4 CONCLUSIONS

- 4.1 The original EQIA identified **numerous positive impacts** arising or likely to arise from the content of the SPD. Some of the relevant references have been strengthened as a result of responses received to the consultation. Originally two negative impacts were identified:-
- **Negative impact in relation to travel packs** (paragraph 3.12 above), which can be mitigated by making them available in alternative formats; DCC to include appropriate advice in their forthcoming toolkit.
 - **Negative impact in relation to cyclists and pedestrians sharing space** (paragraph 3.17 above), which can be mitigated through design that

⁶ At paragraph 10.2.5.

reduces cycling speeds, and provision of high quality facilities which should discourage inappropriate cycling (both of which are promoted by the SPD), and DCC's tolerance campaign. It is also recognised that many facilities designed principally for cyclists, such as off-road routes and toucan crossings, are also useful to those with pushchairs, wheelchairs and buggies and therefore have a positive impact in this respect.

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