

KCC - Growth, Environment and Transport Directorate (GET).

Equality Analysis / Impact Assessment (EqIA) template

Name of decision, policy, procedure, project or service:

Kent & Medway Energy and Low Emissions Strategy

Brief description of policy, procedure, project or service

To co-ordinate the development of an Energy and Low Emissions Strategy for Kent & Medway. This identifies and prioritises action to reduce harmful emissions that contribute to climate change and poor air quality leading to impacts on people's health. The Strategy will also incorporate the strategic approach to energy across the County as there is significant overlap in activity and the resources that are delivering actions.

This Strategy will strengthen and support the UK government's Clean Air Strategy (under consultation), Kent Environment Strategy implementation plan and District Councils' air quality action plans.

It will also take into account the Government's Industrial Strategy, Clean Growth Strategy, the 25 Year Environment Plan and Road to Zero.

Aims and Objectives

Objectives of group

- To oversee the development of a Strategy and Action Plan for Kent & Medway that provides a comprehensive and cohesive framework, to set out the ambition and challenge for a step change in action.
- To seek out relevant data and information to ensure a robust evidence-based approach.
- Identify individuals, groups and organisations that have a key role to play in this agenda and ensure effective engagement and consultation to obtain their contributions and support.
- To identify the areas requiring a partnership approach to be most effective, opportunities for quick wins, synergies between KCC and District Councils.

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- Promote increased partnership action and information sharing.
- Take individual responsibility to promote opportunities, align action and foster a wider awareness of the development of the strategy and the challenges faced from this agenda through our own roles and interactions.

Outcomes

- Support the delivery of Kent & Medway air quality objectives, as defined by EU Directives and the UK's Air Quality Strategy to reduce the level of air pollutants
- To focus local authority action where it can positively influence more secure, sustainable and affordable energy (the energy trilemma) to benefit Kent residents and businesses
- Deliver a joined-up approach to tackling the challenges of climate change and air quality
- Demonstrate tangible improvements in tackling air pollution through more partnership activity
- Ensure actions and resources are focused where they are needed most and to benefit the most vulnerable residents

Outputs

- Strategy and Action plan
- Comprehensive evidence base and identified gaps, where more research is required
- Identify policies required to influence local planning/local plans
- Develop simple messages for the public, for partners to use in communications
- Develop Kent & Medway case studies
- Develop a knowledge hub of current/planned actions
- Joint funding opportunities

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JUDGEMENT

- **Adjust and continue - adjust to remove barriers or better promote equality**

The initial screening did not identify any significant negative impacts, instead some low negative impacts are most likely to be outweighed by the wider positive benefits from the strategy and action plan.

During the development of the Strategy through 2018 and into 2019, further evidence was sought on the previously assumed negative impacts.

One Medium negative impact identified related to parking location and/or design with associated electric vehicle charging point, where access barriers could arise for disabled drivers and carers.

During the public consultation which ran from 2nd July to 23rd September 2019, feedback was invited about Equalities impacts. Several responses advised additional concerns, and these have been included within this revision. This impacts assessment supports the final version of the Strategy to be presented to the Environment & Transport Cabinet Committee and Kent Chief Executives and Leaders.

The additional information is also being considered to inform the supporting action plan. The aim is to ensure that any negative impacts for specific protected characteristics are minimised or addressed as far as reasonably practicable through the final Strategy and action plan.

I have found the Adverse Equality Impact Rating to be **Low**

GET Document Control

Revision History

Version	Date	Authors	Comment
V0.1	13/11/2017	D Kapaj	Initial screening grid completed by Sustainable Business & Communities team (team meeting)
V0.2	23/11/2017	D Kapaj	Review and development of first draft by first meeting of K&M energy and low emissions working group
V0.3	31/01/2018	D Kapaj	Further feedback from K&M energy and low emissions working group and EPE E&D groep
V0.4	19/02/2018	D Kapaj	Refined further based on additional feedback and evidence obtained
V0.5	28/03/2018	D Kapaj	Refined further based on additional feedback and evidence obtained
V0.6	05/04/2018	D Kapaj	Formatted into GET template and feedback from A Agyepong
V1	29/08/2018	D Kapaj	Finalised content to support Environment & Transport Cabinet Committee paper
V2	08/05/2019	D Kapaj	Additional evidence obtained: <ul style="list-style-type: none">- availability of electric/hybrids on Motability Scheme- barriers to walking for over 65s- benefits of 20mph zones- DfT report – disabled people behaviours and attitudes to travel- additional impacts identified by HTW EV Strategy EqIA

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			Revised impacts accordingly – risk level unchanged and no new significant negative impacts
V3	04/11/2019	D Kapaj	Public consultation feedback on equalities impacts taken into account: <ul style="list-style-type: none"> - Impacts for the gypsy and traveller communities. - Fuel poverty - The affordability of new technologies (Electric vehicles, solar, heat pumps etc) for those on low incomes (disabled including those with long-term health issues, older people, families with young children, carers)
V3.1	15/04/2021	L Breeze	Format changes to meet accessibility requirements: <ul style="list-style-type: none"> - Changed red coloured text to a higher contrast colour. - Added alt text for images.

Document Sign-Off (this must be both the relevant Head of Service and the relevant Director)

Attestation

I have read and paid due regard to the Equality Analysis/Impact Assessment. I agree with the actions to mitigate any adverse impact(s) that has /have been identified.

Name	Signature	Title	Date of Issue
Carolyn McKenzie	<i>C McKenzie</i>	Head of Sustainable Business & Communities	14 th November 2019
Katie Stewart	<i>K Stewart</i>	Director of Environment Planning & Enforcement	14 th November 2019

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Part 1 - Screening

Regarding the decision, policy, procedure, project or service under consideration,

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Could this policy, procedure, project or service promote equal opportunities for this group?

Please note that there is no justification for direct discrimination; and indirect discrimination will need to be justified according to the legal requirements

Protected Group	You MUST provide a brief commentary as to your findings, or this EqIA will be returned to you unsigned			High/Medium/Low Favourable Impact
	High Negative Impact	Medium Negative Impact	Low Negative Impact	
Age		Affordability of new energy technologies, where grants are not available.	Encouraging public transport over car potentially gives rise to personal safety concerns ie vulnerable to abuse/followed home. Those with memory problems feel particularly vulnerable. (although road safety stats show public transport is safer than cars ie fewer accidents) Evidence 5	High – children/young people due to evidence of air quality impact on lung development (up to age 9) and long-term effect on health into adulthood Medium – improvements to public transport and

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				<p>walking/cycling infrastructure to provide improved access to active travel options for those who cannot afford their own transport.</p> <p>Medium – improving air quality and home energy efficiency will reduce risks of illness and/or early death particularly linked to conditions mainly affecting young children or older people or due to living in colder homes. (ie heart disease, stroke, COPD)</p> <p>Medium - Young people (aged 18-29) – 25% less likely to own a car, so reliant on public transport/ lift-share and active travel and this age group will benefit from improvements to this</p>
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				<p>infrastructure and availability of pay-as-you-go car clubs.</p> <p>Medium – Young and older people are less likely to be injured or die where 20mph zones are in force (improved safety and reduced air pollution). Over 65s are more likely to walk in places where there are lower speed limits or where footpaths are well maintained.</p> <p>Evidence 3 & Evidence 6</p> <p>Medium – the Strategy aims to target those off the gas network and hard to heat homes such as park homes occupied by retirees</p>
Disability		<p>Physical ability to access suitable parking with electric vehicle charging points could inhibit take up by this group.</p> <p>Evidence 4</p>	<p>Encouraging public transport over car potentially gives rise to personal safety/access concerns (DfT report confirms safety related incidents on and around transport are more likely for disabled people)</p>	<p>Low - Improving air quality may reduce symptoms of some disabling health conditions</p>

		Affordability of new energy technologies, where grants are not available.	Avoid excluding from active travel opportunities as far as reasonably practicable, although disabled are less likely to walk or cycle compared to non-disabled. More frequent and accessible public transport is likely to be a preferable option.	<p>Low – Some energy efficiency improvements such as boilers are linked to disabled adaptations which can benefit those with a disability (e.g. disabled facilities grant)</p> <p>Low – disabled people are less likely to travel and when they do more likely to use buses and taxis compared to cars – improved access to and reducing emissions from these modes will benefit this group Evidence 5</p>
Gender			Encouraging public transport over car potentially gives rise to a personal safety concern (perception by women that personally safer using own car – no recent evidence found for UK/Kent) (although road safety stats show public transport is safer than cars ie fewer accidents)	

Gender identity/ Transgender			Ensure inclusive promotions/communications Encouraging public transport over car potentially gives rise to a personal safety concern (although road safety stats show public transport is safer than cars ie fewer accidents)	
Race			Encouraging public transport over car potentially gives rise to a personal safety concern (although road safety stats show public transport is safer than cars ie fewer accidents) Using more reflective images of population in campaigns and promotions. Ensuring clear language is used and language barriers are reduced where possible in the promotion of schemes and projects under this strategy (inclusive promotions and schemes)	Medium – the Strategy aims to target those off the gas network and hard to heat homes such as mobile/park homes occupied by Gypsy & Traveller communities
Religion and Belief			Ensure inclusive promotions	
Sexual Orientation			Ensure inclusive promotions	
Pregnancy and Maternity			Encouraging public transport over car potentially a personal safety concern (although road safety stats show public transport is safer than cars ie fewer accidents)	Poor air quality impacts lung development of growing foetus (Evidence 1 Evidence)

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				2) and young children. Improving air quality benefits this group
Marriage and Civil Partnerships			N/A	
Carer's Responsibilities		Physical ability to access suitable parking with electric vehicle charging points could inhibit take up by this group. Affordability of new energy technologies, where grants are not available	Carers may be more likely to need a car due to transporting children or cared for individuals, some with specific needs requiring larger (and potentially more polluting) vehicles. Need for careful communications in encouraging less polluting transport modes as affordability for carers on low incomes may be a key issue.	

Conclusion: Overall no significant negative impacts identified, there is potentially one Medium impact for disabled people and carers, which requires the consideration of the selection of locations and design of parking spaces allocated for electric vehicle charging.

More positive benefits will be delivered for the young, old, disabled and maternity (unborn foetus).

Part 2 - Full Equality Analysis /Impact Assessment

From the screening grid, identify the Protected Groups impacted

Disabled

Information and Data used to carry out your assessment

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Evidence 1 Impacts of poor air quality on unborn foetus <https://www.bmj.com/content/359/bmj.j5299>

Evidence 2 Lifelong impact of air quality <https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution>

Evidence 3 Barriers to walking for over 65's <https://www.ciht.org.uk/news/uneven-footways-prevent-older-people-from-walking/>

Evidence 4 Availability of electric and hybrid vehicles for disabled people eligible under the UK motability scheme <https://www.motability.co.uk/>

Evidence 5 DfT report - Disabled peoples travel behaviour and attitudes to travel

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/647703/disabled-peoples-travel-behaviour-and-attitudes-to-travel.pdf

Evidence 6 Impact of 20mph zones <http://eprints.uwe.ac.uk/34851/>

Feedback from the public consultation

Who have you involved consulted and engaged with?

Sustainable Business and Communities team

Kent & Medway Energy & Low Emissions Working group

GET E&D group

A Agyepong, corporate E&D lead

Full public consultation held July to September 2019

Analysis

Benefits have been identified for Age (both young and old), disabled, gender, race and pregnancy (unborn foetus).

Adverse Impact,

Version 1 - Assumed that disabled (specifically physical) may be at a disadvantage when using an Electric Vehicle

This assumption has been further investigated and found that there are 72 hybrid and electric vehicle options available via the Motability scheme. Therefore, access to low emissions vehicles is not seen as a barrier for disabled drivers.

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Version 2 - There is still potential for barriers to access to parking bays with electric charge points for disabled and also carers. This needs to be considered when determining EV charge point locations and associated parking design for individual schemes. This information has been passed on for consideration in the revision of parking standards for Kent Design.

Version 3 – Public consultation feedback highlighted concerns regarding the affordability of new technologies and vehicles for those on low incomes including benefits, particularly where grants are not available, or eligibility criteria is not met. This has been added as Medium impact to age, disability and carers.

In addition, a Medium positive impact has been added for Age (retirement homes) and Race (Gypsy & Traveller communities) who occupy mobile/park homes, which are off the gas network. This is a target audience for reducing fuel poverty.

Positive Impact:

The provision of cleaner vehicles and access to improved walking, cycling and public transport has positive advantages for the characteristics age, disability and pregnancy (unborn foetus).

Part 3 - Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Resource implications
Disability Pregnancy and Maternity	Potential barrier to take up of electric vehicles due to inadequate parking design	Take into account when revising the parking standards under Kent Design	This will need to be taken account of by KCC and District partners when securing funding and establishing actions to expand EV infrastructure across Kent	S Bengé	October 2019	None

Have the actions been included in your business/ service plan?

The action is part of Economic Development's business plan 2019-20 – Kent Design refresh



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