

Equality Impact Assessment / Equality Analysis

Title of service or policy	Local Plan Options Document
Name of directorate and service	Planning Policy
Name and role of officers completing the EIA	Alice Barnes/Kaoru Jacques (Planning Officer/Senior Planning Officer)
Date of assessment	October 2018

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that it is used as a working document throughout the process, with a final version (including the action plan section) being published on the Council’s and NHS Bath and North East Somerset’s websites.

1. Identify the aims of the policy or service and how it is implemented.		
	Key questions	Answers / Notes
1.1	Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The B&NES Local Plan 2016-2036 will replace the Core Strategy (adopted in 2014) and Placemaking Plan (adopted in 2016). The new Local Plan will set the strategic planning framework to help guide change and development until 2036 and will set out detailed development and design principles for the proposed development sites and include a range of policies for managing development and protecting valued assets across B&NES.</p> <p>Once adopted the Local Plan will be implemented by various Council departments including planning services, as well as other public service providers and the private sector.</p> <p>Intended outcomes will be monitored in the B&NES Authority Monitoring Report (AMR).</p>
1.2	Provide brief details of the scope of the policy or service being reviewed, for example: <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is 	<p>Local Authorities are statutorily required to prepare a Local Plan. Preparation of the Local Plan is included in the B&NES Local Development Scheme (LDS), the Council’s formal Planning Policy work programme. Plan-making is a statutory process and their preparation must follow national regulations.</p> <p>The Local Plan is at options stage. This provides the opportunity for the Council to test different options with local communities, stakeholders and the</p>

	there?	<p>development industry without a formal commitment to a policy. The Options document therefore sets out policy approaches for consultation although in some cases a preferred option is expressed. This will enable the demonstration at examination that the 'reasonable alternatives' have been considered in the process of identifying an appropriate strategy.</p> <p>The Plan will be subject to examination to ascertain its 'soundness'. The examining Inspector will need to ascertain that the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Therefore, this stage in the process is necessary in order to explore various alternative approaches & proposals</p>
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	<p>The Local Plan is being prepared in the context of the National Planning Policy Framework (NPPF) which was recently revised in July 2018, and a number of Council strategies, and will facilitate the delivery of Council objectives.</p> <p>The Local Plan will be in conformity with the West of England Joint Spatial Plan which is currently at examination. It has been prepared by Bath and North East Somerset Council, Bristol City Council, North Somerset Council and South Gloucestershire Council. The Local Plan must reflect the spatial vision of the Joint Spatial Plan which sets out the development aspirations for the West of England.</p> <p>The Local Plan will also be co-ordinated with the transport strategy for B&NES and the Joint Transport Strategy for the West of England. Some of the transport strategy proposals will need to be delivered through the Local Plan and relevant proposals are included in the Options document.</p>

2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	Wide range of service deliverers including public, private and voluntary sectors.
2.2	What equalities training have staff received?	The planning policy team have received corporate equalities training and EqIA training. A number of the service deliverers within the Council will have received corporate equalities training.
2.3	What is the equalities profile of service users?	There exists limited information about the user profile for planning applications. However, it is not just planning applicants that will benefit from the policies, which will also include the wider community.
2.4	What other data do you have in terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	There is some limited equalities data from previous rounds of consultation where equalities monitoring information has been provided.

		There is a gap in terms of data relating to the sexual orientation and transgender strands.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>There has been no separate consultation on this EqIA. However, there has been a range of consultation activities undertaken (in accordance with the Statement of Community Involvement) for each stage of the preparation of the document.</p> <p>Consultation Report for Local Plan Launch Document (Winter 2017) has been prepared highlighting the consultation to date. An additional consultation report will be prepared following the Local Plan options consultation.</p>
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	<p>The council has an adopted Statement of Community Involvement. The Council's "My Neighbourhood: Neighbourhood Planning Protocol" explains how the local community can get involved in the preparation of the LDF and sets out our target groups.</p> <p>These are young people, faith, ethnic and language groups, disabled people, gypsies and travellers, people living in rural areas, small business owners and residents.</p> <p>Extensive ongoing consultation is undertaken and this has been targeted with these groups as appropriate. Opportunities for future engagement with equalities groups as the Local Plan progresses will be sought.</p>
3. Assessment of impact: 'Equality analysis'		
	<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> • Meets any particular needs of equalities groups or helps promote equality in some way. • Could have a negative or adverse impact for any of the equalities groups 	
	Examples of what the service has	Examples of actual or potential negative or adverse impact and

		done to promote equality	what steps have been or could be taken to address this
		<p>General point</p> <p>Many of the positive impacts apply across several or all equality strands and this indicated below, in particular see section 3.11.</p>	<p>There is potential for adverse impacts if the Local Plan is not adopted through non delivery of the many positive impacts identified in this EQIA.</p> <p>Examples include:</p> <ul style="list-style-type: none"> -provision of less affordable homes with impacts for those on lower incomes -no policies promoting a mixed economy which may lead to less diversity of employment opportunities with impacts on the age, disability and socio economic strands. -Housing in unsustainable locations
3.1	Gender – identify the impact/potential impact of the policy on women and men.	See 3.11, positive impacts that affect ‘all’.	No adverse impacts identified.
3.2	Pregnancy and maternity	See 3.11, positive impacts that affect ‘all’.	No adverse impacts identified.
3.3	Transgender – identify the impact/potential impact of the policy on transgender people	See 3.11, positive impacts that affect ‘all’.	No adverse impacts identified.
3.4	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	<p>Chapter 8.3 proposes a district wide policy to require enhanced accessibility standards and nationally described space standards in housing.</p> <p>See also 3.11, positive impacts that affect</p>	No adverse impacts identified.

		'all'.	
3.5	Age – identify the impact/potential impact of the policy on different age groups	Chapter 8.3 proposes a policy approach to extra care housing with a revised approach to development management policy H1 Chapter 4 refers to student accommodation being steered to existing university campuses and an emerging policy approach encouraging affordable forms of student accommodation. See also 3.11, positive impacts that affect 'all'.	No adverse impacts identified.
3.6	Race – identify the impact/potential impact on different black and minority ethnic groups	See 3.11, positive impacts that affect 'all'.	No adverse impacts identified.
3.6	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	See 3.11, positive impacts that affect 'all'.	No adverse impacts identified.
3.7	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	See 3.11, positive impacts that affect 'all'.	No adverse impacts identified.
3.8	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Chapter 8.9 refers to policies LCR1-9 which protect against the loss of existing community facilities/uses. See also 3.11, positive impacts that affect 'all'.	No adverse impacts identified.
3.9	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can	Chapter 8.3 refers to affordable housing being proposed to be provided in all major development sites in accordance with the NPPF. It is proposed to include a revised policy on rural exception sites that seeks	No adverse impacts identified.

	influence life chances (this is not a legal requirement, but is a local priority).	to better facilitate delivery of affordable housing in rural areas. Chapter 5 proposes a mixed tenure marina within the North Keynsham Strategic Development Location. See also 3.11, positive impacts that affect 'all'.	
3.10	Rural communities* – identify the impact / potential impact on people living in rural communities	Chapter 8.9 refers to development management policies RE1, RE2 and RE3 which help facilitate economic activity in rural areas RE4 restricts isolated dwellings far away from facilities and services – GPs, shops etc. See 3.11, positive impacts that affect 'all'.	No adverse impacts identified.
3.11	ALL	Development Site allocations in Bath, Keynsham, Somer Valley and Rural Areas The allocation of specific sites for development will help to ensure that the strategic housing and employment requirements outlined in the Joint Spatial Plan are delivered in the most suitable locations and through high quality development. The allocation of development sites will enable the Council to set out clearly planning and development aspirations for sites, outline the mix of uses, establish key design and development principles and identify and deliver key infrastructure requirements.	Positive Impact

		<p>This is of benefit to all equalities groups (gender, transgender, disability, race, age, sexual orientation, religion/belief, socio-economic disadvantage and rural communities).</p> <p>Bath</p> <p>Chapter 4 proposed to retain existing employment space.</p> <p>It is proposed to provide an additional 300 dwellings prioritising the development of brownfield sites. This will include the provision of affordable housing.</p> <p>Proposed student accommodation will be steered towards campuses and this will include the provision of affordable rent accommodation. This should be of benefit to equalities groups.</p> <p>Keynsham</p> <p>The expansion of North Keynsham will aim to deliver around 1,500 new homes, 50,000 sqm of employment floorspace, a new local centre and a new primary school, with potential for a new mixed tenure marina. This will include affordable housing provision and a mix of tenures. It is proposed to apply the garden community principles.</p> <p>It will include new walking and cycling links with improved access to the River Avon. There will be improved public</p>	<p>Bath</p> <p>The public realm should be designed to be accessible to disabled people and people of all age groups.</p> <p>Keynsham</p> <p>The public realm should be designed to be accessible to disabled people and people of all age groups.</p>
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		<p>transport links to encourage sustainable travel. Subject to design of walking/cycling links this should be of benefit to all equalities groups.</p> <p>Whitchurch</p> <p>A new settlement is proposed to be constructed adjacent to Whitchurch village. This will aim to deliver 2000 new homes, with associated employment space and community facilities. This will include affordable housing provision and a mix of tenures. It is proposed to apply the garden community principles.</p> <p>It will include new walking and cycling links with improved access to the surrounding countryside. There will be improved public transport links to encourage sustainable travel. Subject to design of walking/cycling this should be of benefit to all equalities groups.</p> <p>Somer Valley</p> <p>Chapter 7 seeks to increase employment opportunities by delivering the planned additional employment floorspace in the Somer Valley Enterprise Zone and provide greater protection of existing office and industrial space.</p> <p>Provision for 300 to 500 will be made and this will include affordable housing. New housing will be aligned with new infrastructure, both transport and social</p>	<p>Whitchurch</p> <p>The public realm should be designed to be accessible to disabled people and people of all age groups.</p> <p>Somer Valley</p> <p>The public realm should be designed to be accessible to disabled people and people of all age groups.</p>
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		<p>and community facilities. This should be of benefit to all equalities groups.</p> <p>Development Management Polices</p> <p>New Policy Approaches</p> <p>DM1 – Will reflect the energy hierarchy to achieve sustainable construction and the provision of renewable energy. This should help protect residents against rising fuel costs and support decentralised energy.</p> <p>DM2 – Outlines the policy approach towards wind energy development (same beneficial effects as DM1 above)</p> <p>DM3- Proposes to amend the definition of a rural exception site from the current policy position in order to facilitate the provision of affordable housing. This will be of benefit to all equalities groups.</p> <p>DM4 – The policy approach will guard against any loss of affordable housing within areas of redevelopment/ regeneration. This will be of benefit to equalities groups, especially people on lower incomes.</p> <p>DM5 – Supports the provision of self-build plots which should help facilitate housing supply potentially benefitting equalities groups.</p> <p>DM6 – Proposed to clarify whether extra</p>	<p>DM1 – Positive impact</p> <p>DM2 – Positive impact</p> <p>DM3 – Positive impact</p> <p>DM4 – Positive impact</p> <p>DM5 – Positive impact</p>
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		<p>care housing is a C2 or C3b uses. It is likely to have a neutral impact in respect of equalities groups.</p> <p>DM7 – Requires enhanced accessibility standards for residential development. This will be of benefit to equalities groups.</p> <p>DM8 – Introduce nationally described space standards for affordable and market housing to provide a higher quality living environment, which should benefit all equalities groups.</p> <p>DM9 – Allows for replacement dwellings in the Green Belt provided that they are not materially larger than the dwellings they replace. Facilitates housing quality/standard issues to be addressed and therefore, potentially has a positive impact.</p> <p>DM10 – Allows for development as limited infilling in villages in the Green Belt and simplify the definition of infilling. Facilitates delivery of housing.</p> <p>DM11 – The proposed policy seeks to retain existing industrial uses, unless the loss can be justified by the applicant. This will benefit all groups in terms of access to employment uses/premises and jobs.</p> <p>DM12 – The proposed policy seeks to retain existing office floor space within the city centre unless the loss can be justified by the applicant. This will benefit all</p>	<p>DM6 – Neutral impact</p> <p>DM7 – Positive impact</p> <p>DM8 – Positive impact</p> <p>DM9 – Positive impact</p> <p>DM10 – Positive impact</p> <p>DM11 – Positive impact</p> <p>DM12 – Positive impact</p>
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		<p>groups in terms of access to employment uses/premises and jobs.</p> <p>DM13 – Restrict the provision of fast food takeaways near schools and prevent the overconcentration of fast food outlets. This policy is aimed at addressing or avoiding potential negative health impacts of fast food, especially for younger people. Therefore, it has a positive impact in respect of this equalities group.</p> <p>DM14 and 15 – will define parking standards for development which may be amended from current ones in order to help reduce problems associated with on-street parking, including obstruction to footways and difficulty of access for emergency vehicles. Potential to have a positive impact.</p> <p>DM16 – Include electric vehicle charging infrastructure within new development, to encourage the use of low emission vehicles and sustainable travel. This should help facilitate improvements in air quality to the benefit of equalities groups.</p> <p>Review of Existing Policies</p> <p>H2 – A separate EqIA was undertaken to inform the SPD and Article 4 Direction for HMO.</p> <p>H3/H5/H6 – Supports the provision of a</p>	<p>DM13 – Positive impact</p> <p>DM14 and 15 – Positive impact</p> <p>DM16 – Positive impact</p> <p>H2 – Assessed separately in a standalone EqIA.</p> <p>H3/H5/H6 – Positive impact</p>
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		<p>variety of homes benefitting many equalities groups.</p> <p>ED1A /ED1C– Continues to supports provision & protection of employment land in accessible locations and in rural areas.</p> <p>LCR1-9 – Will protect against the loss of existing community facilities and seek to provide facilities accessible by sustainable travel options.</p> <p>CR1/CR2 - Supports retail and town centre uses in town centre locations, before out of town facilities. Town centre locations are generally more accessible for all, including those without a car.</p> <p>CR3/CR4 – More flexible policy to encourage uses that have a positive impact on viability and vitality of the centres but do not compromise amenity/safety etc</p> <p>D1-10 - Supports well-designed buildings and spaces, which should benefit all equalities groups.</p> <p>NE2-6 – Nature and landscape has a positive impact on people’s health & well-being. These policies support ecology , landscape and trees</p> <p>HE1 – This policy seeks to preserve heritage assets and supports active management of change whilst minimising</p>	<p>ED1A/ED1C– Positive impact</p> <p>LCR1-9 – Positive Impact</p> <p>CR1/CR2 - Positive impact as town centres are more accessible to all groups</p> <p>CR3/CR4 – Positive impact</p> <p>D1-10 – Positive impact</p> <p>NE2-6 – Positive impact</p> <p>HE1 – Positive impact</p>
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		<p>conflict with social agendas. Therefore, it has positive impact to equalities groups.</p> <p>ST1-6 and 8 – Supports the provision of safe routes, and sustainable transport modes benefitting equalities groups.</p> <p>SCR2 – 5 – Supports renewable energy generation, energy efficiency, community energy projects, water efficiency and cycle storage standards. This should help protect residents against rising fuel costs and support decentralised energy.</p> <p>PCS1-7- Protection from environmental pollutants/hazards. Therefore, beneficial to all equalities groups.</p> <p>SU1 – Requires SUDS infrastructure to be provided as part of a major development and proposed that policy should give greater clarity on type of SUDS infrastructure required. By ensuring drainage issues are addressed the policy has a beneficial impact for all groups.</p>	<p>ST1-6 and 8 – Positive Impact</p> <p>SCR2 – 9 – Positive impact</p> <p>PCS1-7 - Positive impact</p> <p>SU1 – Positive Impact</p>
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There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES therefore been included in the assessment above.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
<p>The Local Plan options consultation has been designed to be inclusive and engage all groups, actions include:</p> <ul style="list-style-type: none"> - Drop in events/exhibitions held across the District as well as information being provided online - Selecting accessible venues for drop-in events - Including the same information at each event so members of the public can attend any event - All display material available on request and will be published on-line - Engaging with specific groups e.g. university students (young people) on student accommodation issues, parish councils on issues affecting residents in rural areas 	<p>The Local Plan consultation strategy has incorporated these actions.</p> <p>Further consultation stages will also need to be reviewed accordingly</p>	Completed	Planning Policy Team	
The Local Plan site allocations	The Local Plan will need to	Draft Plan Stage	Planning	Draft Plan

should, where relevant, ensure that site requirements fully take into account any particular needs of equalities groups that have been identified	incorporate the requirements of this assessment if those sites identified are taken forward as site allocations		Policy Team	Stage.
The Masterplanning process for strategic sites needs to ensure that equalities groups are engaged	The process is outlined in the My Neighbourhood document.	Consultation Strategies for strategic site in preparation.	Planning Policy Team	During preparation of the Masterplans and subsequent planning processes.

5. Sign off and publishing

Once you have completed this form, it needs to be ‘approved’ by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council’s and/or NHS B&NES’ website. Keep a copy for your own records.

Signed off by: *Richard Daone* Planning Policy Team Manager (nominated senior officer)

Date: October 2018