

Equality Impact Assessment / Equality Analysis

Title of service or policy	Placemaking Plan (Local Plan Part 2)
Name of directorate and service	Planning Policy
Name and role of officers completing the EIA	Cleo Newcombe-Jones and Neil Best, Planning Policy Officers
Date of assessment	November 2014

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 primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. 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 this 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	<p>Briefly describe purpose of the service/policy including</p> <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><i>The Placemaking Plan is part 2 of the new Local Plan for B&NES, which will complement the Core Strategy (Part 1) and replaces the remaining saved policies within the current Local Plan (adopted in 2007). It introduces new planning policies for determining planning applications and allocates specific sites for development.</i></p> <p><i>The Core Strategy has set out the strategic planning framework to help guide change and development until 2029. The Placemaking Plan 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.</i></p> <p><i>Once adopted the Placemaking Plan will be implemented by various Council departments including planning services, as well as other public service providers and the private sector.</i></p> <p><i>Intended outcomes will be monitored in the B&NES Monitoring Report (AMR).</i></p>
1.2	Provide brief details of the scope of the policy	<i>Local Authorities are required to prepare a Local Plan.</i>

	<p>or service being reviewed, for example:</p> <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 there? 	<p><i>Preparation of the Placemaking Plan is included in the B&NES Local Development Scheme (LDS), the Council’s formal Planning Policy work programme.</i></p> <p><i>Any plan which seeks to allocate sites for development or regulate development is a Development Plan Document. Plan-making is a statutory process and their preparation must follow national regulations.</i></p> <p><i>The Placemaking Plan is at options stage. This provides the opportunity for the Council to test different options with local communities, stakeholders and the 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 (anticipated in 2015/2016) that the alternatives options have been considered in the process of identifying the most appropriate strategy.</i></p> <p><i>The Plan will be subject to examination to ascertain its ‘soundness’. The examining Inspector will need to ascertain that the plan should be the most 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</i></p>
<p>1.3</p>	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p><i>Like the Core Strategy, the Placemaking Plan is being prepared in the context of the National Planning Policy Framework (NPPF) and a number of Council strategies, and will facilitate the delivery of Council objectives.</i></p> <p><i>The Placemaking Plan will help to deliver the Council’s three key strategies (the Economic, Health and Wellbeing and Transport strategies) as well as other initiatives such as the Fit for Life strategy and those related to climate change, development and regeneration, housing, education and cultural development.</i></p>

In complementing the Core Strategy, the Placemaking Plan must reflect the Core Strategy spatial vision. It is acknowledged that the Council has refreshed its corporate vision since the publication of the Core Strategy through the above strategies. However, the Core Strategy objectives and direction of travel are still in line with the refreshed corporate vision.

The Council has been progressing the Enterprise Area Masterplan in Bath which includes a spatial vision and sets out development aspirations for various sites along the river corridor. The Placemaking Plan Options consultation enables the opportunity to formally test this evidence through the statutory plan-making process, alongside reasonable' alternatives.

The Placemaking Plan will need to also be closely co-ordinated with the emerging Bath Transport Strategy. Some of the Transport strategy proposals will need to be delivered through the Placemaking Plan and relevant proposals are included in the Options documents. The Infrastructure Plan will need to be continually updated to ensure a close alignment of new development with infrastructure in its broadest sense

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?	<i>Wide range of service deliverers including public, private and voluntary sectors.</i>
2.2	What equalities training has staff received?	<i>The planning policy team have received corporate equalities training and EqIA training.</i> <i>A number of the service deliverers within the Council will have received corporate equalities training.</i>
2.3	What is the equalities profile of service users?	<i>We have limited information about the user profile for planning applications. However, it is not just planning applicants that will benefit from the policies.</i> <i>Through equalities mapping and population profile analysis we now know more about the wider groups of user who will benefit from planning policy and the Core Strategy. (Bath and North East Somerset, 2009. Equality Profile).</i>
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?	<i>We have some limited equalities data from previous rounds of consultation where people have included equalities monitoring information.</i> <i>We have Equality Mapping and the 'Population of Bath and North East Somerset' for data on those that live in the District.</i> <i>There is a gap in terms of data relating to the sexual orientation and transgender strands.</i>

2.5	<p>What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p><i>There has been no separate consultation on this EqIA. However, there has been a range of consultation activities undertaken as summarised in the Consultation reports (which incorporates a Statement of Community Involvement) for each stage of the preparation of the document.</i></p> <p><i>Consultation Report for Placemaking Plan Launch Document (Nov 2014) has been prepared highlighting the consultation to date. An additional consultation report will be prepared following this Placemaking Plan options consultation.</i></p>
2.6	<p>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>	<p><i>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.</i></p> <p><i>These are young people, faith, ethnic and language groups, disabled people, gypsies and travellers, people living in rural areas, small business owners and residents.</i></p> <p><i>We have done extensive ongoing consultation with these groups and we should continue to seek opportunities for future engagement with equalities groups.</i></p> <p><i>New legislation introduces 'maternity and pregnancy' and 'marriage and civil partnership', a future action is to consider how to involve representatives of these communities.</i></p>
<p>3. Assessment of impact: 'Equality analysis'</p>		
<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate</p>		

	you have analysed how the service or policy: <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 done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
		<p>General point</p> <p><i>Many of the positive impacts apply across several or all equality strands so to highlight this all strands associated with the positive impact are indicated in brackets and a summary of positives that apply to all strands are outlined at 3.10.</i></p>	<p><i>There is potential for adverse impacts if the Placemaking Plan is not adopted through non delivery of the many positive impacts identified in this EQIA.</i></p> <p><i>Examples include:</i></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.
3.1	Gender – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?)	<i>See 3.10, positive impacts that affect ‘all’.</i>	<i>No adverse impacts identified.</i>
3.2	Transgender – – identify the impact/potential impact of the policy on transgender people	<i>See 3.10, positive impacts that affect ‘all’.</i>	<i>No adverse impacts identified.</i>
3.3	Disability - identify the impact/potential impact of the	<i>See 3.10, positive impacts that affect ‘all’.</i>	<i>No adverse impacts identified.</i>

	policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)		
3.4	Age – identify the impact/potential impact of the policy on different age groups	<i>See 3.10, positive impacts that affect ‘all’.</i>	<i>No adverse impacts identified.</i>
3.5	Race – identify the impact/potential impact on different black and minority ethnic groups	<i>See 3.10, positive impacts that affect ‘all’.</i>	<i>No adverse impacts identified.</i>
3.6	Sexual orientation - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people	<i>See 3.10, positive impacts that affect ‘all’.</i>	<i>No adverse impacts identified.</i>
3.7	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	<i>See 3.10, positive impacts that affect ‘all’.</i>	<i>No adverse impacts identified.</i>
3.8	Socio-economically disadvantaged – identify the impact on people who are disadvantaged due to factors like family background, educational attainment,	<i>See 3.10, positive impacts that affect ‘all’.</i>	<i>No adverse impacts identified.</i>

	neighbourhood, employment status can influence life chances		
3.9	Rural communities – identify the impact / potential impact on people living in rural communities	<i>See 3.10, positive impacts that affect 'all'.</i>	<i>No adverse impacts identified.</i>
3.10	ALL	<p>Part 1: Development Site allocations in Bath, Keynsham, Somer Valley and Rural Areas <i>The allocation of specific sites for development will help to ensure that the strategic housing and employment requirements outlined in the Core Strategy 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. This is of benefit to all equalities groups (gender, transgender, disability, race, age, sexual orientation, religion/belief, socio-economic disadvantage and rural communities).</i></p> <p>AND IN ADDITION</p> <p>Walcot Street / Cattlemarket <i>Development and design principles require provision of improved pedestrian and visual links to the river, improving and connecting to the existing riverside walkway, enabling the provision of a continuous riverside walkway from Pulteney Bridge northwards, and a potential new pedestrian and cycling bridge.</i></p>	<p>Part 1: Development Site allocations in Bath, Keynsham, Somer Valley and Rural Areas <i>Positive impact</i></p> <p>Walcot Street / Cattlemarket <i>The improved pedestrian links and potential new bridge should be designed to be accessible to disabled people and people of all age groups.</i></p>

		<p><i>This should be of benefit to all equalities groups.</i></p> <p>Central Riverside and Recreation Ground <i>Development and design principles require opportunities for better access to the riverside, with enhanced access to and activity in Parade Gardens. This should be of benefit to all equalities groups.</i></p> <p>Manvers Street <i>Development and design principles require consideration of a new pedestrian and cyclist bridge that connects this site with the residential community beyond, and a new north-south street aligned to Duke Street designed as a shared space. This should be of benefit to all equalities groups.</i></p> <p>North Quays <i>Development and design principles require a new foot and cycle bridge to connect an expanded city centre with the South Quays development and the significant residential communities to the south. This should be of benefit to all equalities groups.</i></p> <p>South Quays and Riverside Court <i>See North Quays for new bridge. Development and design principles require pedestrian access to the riverside and new public realm. This should be of benefit to all equalities groups.</i></p> <p>South Bank <i>Development and design principles require pedestrian access to the riverside. This should be of benefit to all equalities groups.</i></p>	<p>Central Riverside and Recreation Ground <i>The improved access to the riverside and Parade Gardens should be designed to be accessible to disabled people and people of all age groups.</i></p> <p>Manvers Street <i>The potential new bridge should be designed to be accessible to disabled people and people of all age groups. The new street designed as a shared space should be designed for use by blind or partially-sighted people as recommended in Manual for Streets.</i></p> <p>North Quays <i>The new bridge should be designed to be accessible to disabled people and people of all age groups.</i></p> <p>South Quays and Riverside Court <i>See North Quays for new bridge. The improved access to the riverside should be designed to be accessible to disabled people and people of all age groups. The public realm should be designed for use by blind or partially-sighted people as recommended in Manual for Streets.</i></p> <p>South Bank <i>The improved access to the riverside should be designed to be accessible to disabled people and people of all age groups.</i></p>
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		<p>groups.</p> <p>Part 2: Development Management Policies:</p> <p>H1 – Will assist in providing high quality well-designed development for the elderly and people with supported housing and care needs</p> <p>H2 – Will ensure that efficient use is made of sites that are well located for facilities and services, increasing the potential for social inclusion</p> <p>H3 – A separate EqIA was undertaken to inform the SPD and Article 4 Direction for HMO.</p> <p>H4/H5/H8 – Supports the provision of a variety of homes</p> <p>ED1A/ED1B/ED1C/ED2A/ED2B– Supports provision & protection of employment land in accessible locations and in rural areas</p> <p>RE1/RE2/RE3 – Supports economic activity in rural areas</p> <p>RE4 – Restricts isolated dwellings far away from facilities and services – GPs, shops etc.</p> <p>CR1/CR2 - Supports retail and town centre uses, before out of town facilities</p> <p>CR3/C4 – 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>UD1-8 – Supports well-designed buildings and</p>	<p>H1 – Positive impact</p> <p>H2 – Positive impact</p> <p>H3 – Assessed separately in a standalone EqIA.</p> <p>H4/H5/H8 – Positive impact</p> <p>ED1A/ED1B/ED1C/ED2A/ED2B– Positive impact</p> <p>RE1/RE2/RE3 – Positive impact</p> <p>RE4 – Positive impact</p> <p>CR1/CR2 - Positive impact as town centres are more accessible to all groups</p> <p>CR3/C4 – Positive impact</p> <p>UD1-8 – Positive impact</p>
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		<p><i>spaces</i></p> <p>NE1 – Green Infrastructure provision can provide a number of social benefits for a wide range of groups. A separate EqIA was produced alongside the GI Strategy.</p> <p>NE2- 6 – Nature and landscape has a positive impact on people’s lives these policies support ecology , landscape and trees</p> <p>HE1 – In the same way heritage needs to be preserved – this policy supports active management of change minimising conflict with social agendas</p> <p>LCR1-9 – Supports protection of and provision of community facilities</p> <p>ST1-8 – Supports the provision of safe routes, and sustainable transport modes</p> <p>SCR1- Potential conflicts with modifications to properties needed for disability etc have been taken into account, leading to specific exceptions to installation where there are barriers that cannot be resolved.</p> <p>SCR2 – 9 – Supports renewable energy generation, energy efficiency, community energy projects, water efficiency and cycle storage standards. Which should protect residents against rising fuel costs and support decentralised energy</p> <p>PCS1-7 Protection from environmental pollutants/hazards</p>	<p>NE1 – Positive impact</p> <p>NE2- 6 – Positive impact</p> <p>HE1 – Positive impact</p> <p>LCR1-9 – Positive impact</p> <p>ST1-8 – Positive impact</p> <p>SCR1- Positive impact</p> <p>SCR2 – 9 – Positive impact</p> <p>PCS1-7 - Positive impact</p>
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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. 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
<i>The Core Strategy EqIA highlighted the need for an EqIA for the Placemaking Plan.</i>	<i>This report completes this action; however, the EqIA will need to be reviewed with further iterations of the plan.</i>	<i>Future key stages in Plan</i>	<i>Planning Policy & Environment Team</i>	<i>Key stages of production</i>
<i>The Core Strategy EqIA noted that specific policies should be included in the Placemaking Plan e.g. on:</i> <i>i. Care Home and Student Accommodation design</i>	<i>Policies have been included in the Placemaking Plan options on this issue.</i>	<i>Completed.</i>	<i>Planning Policy & Environment Team</i>	<i>n/a</i>
<i>The Core Strategy EqIA noted that the Masterplanning process for strategic sites needs to ensure that equalities groups are engaged</i>	<i>The Core Strategy policy requires this and refers to the process outlined in the My Neighbourhood document.</i>	<i>Consultation Strategies for strategic site in preparation.</i>	<i>Planning Department & Landowners. Developers</i>	<i>During preparation of the Masterplans and subsequent planning processes.</i>
<i>The Placemaking Plan consultation has been designed to be inclusive and engage hard to reach groups, actions include:</i>	<i>The Placemaking Plan consultation strategy has incorporated these actions.</i>	<i>Completed.</i>	<i>Planning Policy & Environment Team</i>	<i>n/a</i>

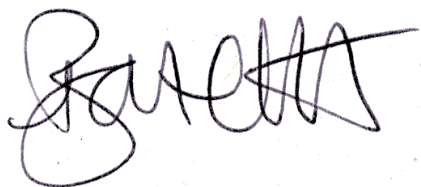
<ul style="list-style-type: none"> - <i>Events held as well as information being provided online</i> - <i>Selecting accessible venues for drop-in events and including a star symbol for level access on flyer</i> - <i>Including the same information at each event so members of the public can come to any drop-in event</i> - <i>Preparing summary information will assist accessibility</i> - <i>Including details of the events in mailout- so that those without internet have details of the events</i> - <i>Printed out comment forms will be available at the drop-in events and assistance can be provided at events or in the one stop shop to help fill these in</i> <p><i>Action Packs will also be provided to the Parish & Town Councils which will enable locally run consultation – suggestions around consultation with hard to reach groups will be included in the pack information with ref to the “My Neighbourhood” Guide.</i></p> <p><i>Information will also be sent to every household (Connect Magazine).</i></p>	<p><i>Further consultation stages will also need to be reviewed accordingly</i></p>			
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<i>The Placemaking Plan site allocations should where relevant ensure that site requirements fully take into account any particular needs of equalities groups that have been identified</i>	<i>The Draft Placemaking Plan will need to incorporate the requirements of this assessment if those sites identified are taken forward as site allocations</i>	<i>Draft Plan Stage</i>	<i>Planning Policy & Environment Team</i>	<i>Draft Plan Stage</i>
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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: Lisa Bartlett, Divisional Director - Development



Date: 14.11.14