



Working together for health & wellbeing

Equality Impact Assessment / Equality Analysis

(updated May 2020)

Title of service or policy	Local Plan Partial Update – Options Consultation (January 2021)
Name of directorate and service	Planning Policy
Name and role of officers completing the EIA	Cindy Carter: Planning Policy Officer and Richard Daone: Deputy Head of Planning (Policy)
Date of assessment	December 2020

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 services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable**. It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website.

1.	Identify the aims of the policy or service and how it is implemented.			
	Key questions	Answers / Notes		
1.1	How the service/policy is delivered and by whom If responsibility for its implementation is shared with other departments or organisations Intended outcomes	The Local Plan 2011-2029 comprises the Core Strategy (adopted July 2014) and the Placemaking Plan (adopted July 2017). The Core Strategy is a key policy document for Bath & North East Somerset (B&NES) that puts in place a strategic planning framework to guide change and development in the District over the plan period and beyond. The Placemaking Plan helps to deliver better places by facilitating the delivery of high quality, sustainable and well-located development supported by the provision of infrastructure. A Local Plan Partial Update (LPPU) is being undertaken to update some policies and provide some new policies to the adopted Local Plan primarily to address the climate and nature emergency, replenish housing supply and to support the Council's overarching strategic plan https://beta.bathnes.gov.uk/corporate-strategy-2020-2024-survey Once adopted, the LPPU will be implemented together with the current Local Plan by various Council departments, including planning services, as well as other public service providers and the private sector.		

1.2	Provide brief details of the scope of the policy or service being reviewed, for example: Is it a new service/policy or review of an existing one? Is it a national requirement?). How much room for review is there?	Intended outcomes from the LPPU will be monitored together with outcomes from the existing Local Plan in the B&NES Authority Monitoring Report. Local Authorities are statutorily required to prepare a Local Plan and update as necessary. Preparation of the LPPU 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 follows national regulations. The LPPU is at the 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 that the 'reasonable alternatives' have been considered in the plan-making process. The Plan will be subject to examination by a government appointed Planning Inspector to ascertain its 'soundness'. The examining Inspector will need to ascertain that the plan is an appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Therefore, the options consultation stage in the process is necessary in order to explore various alternative approaches and
		proposals.
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	The LPPU is being prepared in the context of the National Planning Policy Framework (NPPF) 2019 and a number of Council strategies and will facilitate the delivery of Council objectives. The B&NES Council Corporate Strategy 2020-2024 (adopted February 2020) sets out the Council's overarching strategic plan with the overriding purpose 'to improve people's lives.' The two core policies within the Strategy focus on tackling the climate and nature emergency and giving people a

bigger say. To translate the purpose into commitments, three principles have been identified; preparing for the future, delivering for local residents and focussing on prevention.

A full review of the Local Plan will take place after the partial update

A full review of the Local Plan will take place after the partial update (LPPU) alongside the West of England (WECA) Spatial Development Strategy (SDS) which is scheduled for publication in 2023.

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, sex, 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 equalities training have staff received to enable them to understand the needs of our diverse community?	The planning policy team have received corporate equalities training and EqIA training.
		A number of the service deliverers within the Council have received

		corporate equalities training.
2.2	What is the equalities profile of service users?	The LPPU covers the full B&NES Council local authority area. Link to Bath Council equalities data for B&NES https://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/research-library/36266
2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	The most recent customer satisfaction survey relating to planning policy was undertaken in November 2017. This survey did not monitor the equalities profile of service users. Due to the limited scope of the LPPU it is proposed to undertake equalities monitoring of customers/respondents for the full review of the Local Plan.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	There has been no separate consultation on the EqIA. However, consultation has taken place on the Local Plan Partial Update Commencement Document (April 2020).
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?	The Local Plan Partial Update (LPPU) Options Consultation and Engagement Strategy sets out the arrangement for consultation with the local community and all other relevant stakeholders in respect of the Options Consultation. This follows the first round of consultation that took place on the Commencement Document (which outlined the intended scope of the LPPU and process/timetable for its preparation) in April 2020. The Strategy meets statutory requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, and the Bath and North East Somerset Neighbourhood Planning Protocol. It also takes into consideration the measures implemented by the Government as a result of the coronavirus (COVID19) pandemic.

amended and the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) general consultation bodies include:

- Voluntary bodies, some or all whose activities benefit any part of the local planning authority's area
- Bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area
- Bodies which represent the interests of different religious groups in the local planning authority's area
- Bodies which represent the interests of disabled persons in the local planning authority's area
- Bodies which represent the interests of persons carrying on business in the local planning authority's area

3. Assessment of impact: 'Equality analysis'

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:

- Meets any particular needs of equalities groups or could help 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
Ge	eneral	
eco	ne LPPU supports the climate and cological emergencies and other colorities as set out in the Council's	Opportunities to consider proposed policy within the LPPU and equalities has been highlighted throughout and actions are set out

		overarching strategic plan with the overriding purpose 'to improve people's lives.' Section 3.12 below sets out the proposed policy options and amendments and new policy proposals within the LPPU and equality considerations.	under Section 4. The LPPU once adopted will form part of the Council's adopted Local Plan. The Local Plan includes various policies to support all communities. Viability testing will consider impact of policy/development requirements in the LPPU on wider planning obligations.
3.1	Sex – identify the impact/potential impact of the policy on women and men.	See 3.12	No adverse impacts identified.
3.2	Pregnancy and maternity	See 3.12	No adverse impacts identified.
3.3	Gender reassignment – identify the impact/potential impact of the policy on transgender people	See 3.12	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)	See DM12, DM21, DM23, DM26, DM27, DM30, DM31, DM32, DM33 under 3.12.	Opportunities to consider proposed policy and equality considerations have been highlighted below and proposed actions are set out under Section 4.
3.5	Age – identify the impact/potential impact of the policy on different age groups	See DM12, DM20, DM21, DM23, DM 27, DM30, DM31, DM32, DM33 under 3.12.	Opportunities to consider proposed policy and equality considerations have been highlighted below and proposed actions are set out under Section 4.

		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
3.6	Race – identify the impact/potential impact on across different ethnic groups	See 3.12	No adverse impacts identified.
3.7	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	See 3.12	No adverse impacts identified.
3.8	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	See 3.12	No adverse impacts identified.
3.9	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	See 3.12	No adverse impacts identified.
3.10	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	See DM1, DM2, DM3, DM16 under 3.12.	Opportunities to consider proposed policy and equality considerations have been highlighted below and proposed actions are set out under Section 4.

3.11	Rural communities* – identify the impact / potential impact on people living in rural communities	See 3.12	No adverse impacts identified.
3.12	ALL	Development Management Policies DM1 Net Zero Carbon Construction Policy – New Build Residential Development Options include zero carbon construction policy and Future Homes proposals. Proposed policy to support the climate emergency to benefit all. Opportunities to support residents with rising fuel costs.	Viability testing to consider potential impact of development requirements on wider planning obligations.
		DM2 Energy Hierarchy to achieve zero carbon Outlines the policy approach to using an energy hierarchy to achieve zero carbon. Proposed policy to support the climate emergency to benefit all. Opportunities to support sustainable energy and residents with rising fuel costs.	Viability testing to consider potential impact of development requirements on wider planning obligations.
		DM3 Retrofitting Existing Buildings Options cover the requirement to reduce regulated carbon emissions and seeks to encourage and enable retrofitting of energy efficiency measures and the	Viability testing to consider potential impact of development requirements on wider planning obligations.

appropriate use of micro-renewables in historic buildings and in conservation areas.

Proposed policy to support the climate emergency to benefit all.
Opportunities to support residents with rising fuel costs.

DM4 Whole Life Cycle Carbon Assessment

Proposes requiring the submission of Whole Life Cycle Carbon Assessment for major developments with options considering scale of development.

Proposed policy to support the climate emergency to benefit all.

DM5 Renewable Energy

It is proposed to update Policy CP3 Renewable Energy to facilitate an increase in the level of renewable energy generation.

Proposed policy to support the climate emergency to benefit all.

DM6 Emerging policy for harnessing wind energy

Outlines proposed policy approach towards wind energy development.

Wider viability testing to consider potential impact of development requirements on wider planning obligations.

Proposed policy to support the climate emergency to benefit all.

DM7 Harnessing wind energy

Provides policy options regarding landscape area approach.

DM8 Electric Vehicle Charging

Policy proposes options for electric vehicle charging in residential and non-residential development and grid capacity.

Proposed policy to support the climate emergency to benefit all.

DM9 Sites, Species and Habitats

It is proposed to update Local Plan Policy NE3 to reflect updated requirements as relates to biodiversity.

Proposed updated policy to support the ecological emergency to benefit all.

DM10 Ecological Networks and Nature Recovery

It is proposed to update Local Plan Policy NE5 to include nature recovery networks supporting habitat creation, protection, enhancement, restoration and /or management.

Proposed updated policy to support the

Viability testing to consider potential impact of development requirements on wider planning obligations.

Policy will need to consider the accessibility of EV charging infrastructure and requirements as relates to disabled parking bays.

ecological emergency to benefit all.

DM11 Biodiversity Net Gain

Options propose the introduction of policy requiring biodiversity net gain (10% +) within development. The draft Environment Bill is proposing to require a 10% BNG within certain development.

Viability testing to consider potential impact of development requirements on wider planning obligations.

Proposed updated policy to support the ecological emergency to benefit all.

DM12 Green Infrastructure

It is proposed to update Policy CP7 Green Infrastructure to include a designation as relates to the Bath River Line project. The purpose of the designation would include identifying and facilitating opportunities for the wider network (of GI corridors, footpaths/cycle paths etc.) to connect into it. It is also proposed to amend the policy to emphasise the benefits of green spaces for health and well-being.

Consider opportunities within policy to support inclusive design enabling access for all.

Proposed updated policy to support the climate and ecological emergencies to benefit all.

DM13 Pollution and Nuisance

It is proposed to update Policy PCS1 to address artificial pitches and other pollution issues.

DM14 Contamination

It is proposed to update Policy PCS5 to address artificial pitches and other pollution issues.

DM15 New and replacement sports and recreational facilities

It is proposed to update Policy LCR6 to address artificial pitches pollution issues.

DM16 Updates to Policy CP9 Affordable Housing as relates to Build to Rent Schemes

It is proposed that affordable housing units within Build to Rent schemes should be discounted to a minimum of 30% with regard given to affordability on a site by site basis.

Proposal to support wider affordable housing options/delivery within B&NES to benefit all.

DM17 Houses in Multiple Occupation

Options propose an update to Policy H2 Houses in Multiple Occupation to address wider HMO considerations and delivery.

DM18 Housing in Multiple Occupation

Provides proposed policy amendments as relates to new build HMOs and for change of use to HMO and updates

criteria for consideration when determining applications.

DM19 Intensification of Existing Housing in Multiple Occupation

Proposed new policy to address applications for the intensification of existing small HMOs to large HMOs.

DM20 Purpose Built Student Accommodation (PBSA)

Policy options include the introduction of new policy to restrict PBSA to allocated sites, or elsewhere in the district only where need is demonstrated, or to increase the scope of policy H2 to refer to PBSA, including assessment against the HMO threshold test or no policy change. Proposals to consider opportunities to meet housing needs of all ages including students.

DM21 Purpose Built Student Accommodation (PBSA)

Proposed policy sets out development requirements as relates to PBSA.

DM22 Proposed tracked changed update to Policy H2 Houses in Multiple Occupation.

Proposed update sets out approach to

Consider opportunities to include policy requirements as relates to accessible accommodation and facilities.

HMOs and PBSA.

DM23 Housing Accessibility

It is proposed to update Policy H7
Housing Accessibility to require M4(2)
accessible and adaptable dwellings and
M4(3) wheelchair user dwellings in line
with up to date evidence and subject to
viability testing. It is proposed that the
policy includes an approach to site
specific factors such as flooding and
topography. For affordable housing M4(2)
accessible and adaptable dwellings
standard will be applied to houses,
ground floor flats and upper floor flats
where a lift is installed, and age restricted
homes.

Supports accessible housing standards for all including older people and people with disabilities.

DM24 Strategic and other Primary Industrial Estate (amendment to Policy ED2A)

It is proposed that a review of existing sites is undertaken and more sites added to ED2A as Primary Industrial Estates.

DM25 Non-Strategic Industrial Premises (amendments to Policy ED2B)

It is proposed to strengthen the policy

Viability testing to consider potential impact of development requirements on wider planning obligations.

protection of existing industrial sites. The Council will be undertaking research to explore the important role of industrial sites of strong neighbourhood importance. The research will look to analyse the role and importance of these sites to both the local community and functioning of the local economy in terms of sustainability. It is proposed to update Policy ED2B.

Opportunities to facilitate green recovery and support the climate change emergency to benefit all.

DM26 Bath Spa University Locksbrook Campus

It is proposed to include policy to identify and allocate a site for mixed uses including teaching, community uses, creative innovation art studio space in walking distance to the Locksbrook campus.

DM27 Promoting Sustainable Travel It is proposed to update Policy ST1: Promoting Sustainable Policy to support sustainable transport and address the climate change emergency.

DM28 Sustainable Transport RoutesIt is proposed to amend Policy ST2
Sustainable Transport Routes to widen

Consider opportunities to ensure that the site supports movement networks for all.

Policy should consider opportunities to support accessibility for all, including older people and people with disabilities.

the scope to include other land to be safeguarded for sustainable travel purposes.

DM29 Recreational Routes

It is proposed to amend Policy ST2A such that developments are expected to enhance recreational routes, rather than just maintaining them or avoiding harm. There will be an expectation that the developer/applicant will provide additional linkages where appropriate.

Design should aim to achieve healthy, inclusive and safe places for all.

DM30Transport Infrastructure

It is proposed to strengthen Policy ST3 Transport Infrastructure to promote mode shift to sustainable transport as a priority over traffic capacity. Policy should consider accessibility for older people and people with disabilities who are unable to access transport options including walking, cycling or public transport.

DM31 Traffic Management Proposals

It is proposed to update Policy ST5 Traffic Management Proposals to reflect the Council's Liveable Neighbourhoods Strategy. Additional requirements will include re-balancing spaces towards people and away from vehicles, supporting people with restricted mobility and retaining vehicular access for residents and businesses.

Policy should consider accessibility for all including those with physical, sensory and cognitive impairments and mental health needs. Policy should consider accessibility for older people and people with disabilities who are unable to access transport options including walking, cycling or public transport.

DM32 Park & Ride

It is proposed to update Policy ST5 Park & Ride to develop a new model of

It will be important that 'interchange' design considers access and facilities for all.

'interchange' for multi modal connection, not just car to bus.

Proposed policy to support the climate emergency to benefit all.

DM33 Transport Requirements for Managing Development

It is proposed to update Policy ST7
Transport Requirements for Managing
Development to require development to
offer sustainable travel choices and to
maximise transport improvements to
maximise sustainable travel opportunities.
It is proposed to remove parking
standards for Policy and define them in a
new Parking SPD.

Proposed policy to support the climate emergency to benefit all.

DM34 Green Belt

It is proposed to update Policy GB2
Development in Green Belt Villages with options to amend reference to Housing Development Boundaries (HDBs) so that it is clear they are infill boundaries and that they are not determinative as to whether development is to be regarded as infill; or to remove HDBs from the Policies Map and the reference to them in the policy and for limited infill to be considered solely on an individual

Proposed policy should consider accessibility for all including those with physical, sensory and cognitive impairments and mental health needs. The Parking SPD should consider disabled parking requirements. scheme basis.

Addressing Housing Supply

Based on the Local Plan (Core Strategy and Placemaking Plan) spatial strategy, to provide housing to meet supply shortfall, it is proposed to review sites already allocated within the Placemaking Plan and identify new opportunities.

Bath and Keynsham (housing supply) Bath

- Policy SB8 Bath Riverside
- Policy SB14 Twerton Park
- SB18 Bath Royal United Hospital
- SB10 Roseberry Place (phase 2)
 Depot Site (Station Road, Newbridge)(new allocation)
- Sion Hill (new allocation)

Keynsham

- Policy KE2a Fire Station
- Treetops Nursing Home (new site)
- Policy KE3b land at north and east Keynsham

Other opportunity sites

 Bath 1 Options for Policy B1 as it relates to the Recreation Ground

Bath and Keynsham

Sustainable transport opportunities and transport requirements for managing development should consider opportunities to support accessibility for all, including older people and people with disabilities.

The public realm and facilities should provide inclusive design to support access for all and achieve healthy, inclusive and safe places. Affordable housing delivery within residential development to be considered and sought in accordance with policy.

Consider opportunities for a mix of housing including the needs of different groups in the community including families with children, older people and people with disabilities.

Other opportunity sites

Sustainable transport opportunities and transport requirements for managing development should consider opportunities to

- Bath 2 SB2 Development
 Requirements and Design
 Principles Central Riverside and
 Recreation Ground
- Bath 3 Milsom Quarter —
 Proposed identification of Milsom
 Quarter and inclusion of policy
 enabling greater flexibility and
 diversity of uses within the defined
 area, focussing on a mix of town
 centre uses and residential
 development.
- Bath 4 SB1 (Cattle market site) —
 It is proposed to update Policy SB1
 so that it refers to a more
 significant residential element,
 including on the ground floor, as
 part of a mixed-use scheme to
 deliver a comprehensive
 redevelopment of the site.
- Bath 5 SB19 University of Bath It is proposed to update Policy SB19 to reflect the emerging University of Bath Claverton Campus masterplan.
- Bath 6 Park and Ride It is proposed to revise the functions of the Park and Ride sites so that they act as a transport interchange; potentially accommodate solar energy infrastructure and potentially accommodate household waste

support accessibility for all, including older people and people with disabilities.

The public realm and facilities should provide inclusive design to support access for all and achieve healthy, inclusive and safe places. Where these other opportunity sites include residential development affordable housing delivery to be considered and sought in accordance with policy.

Consider opportunities for a mix of housing including the needs of different groups in the community including families with children, older people and people with disabilities.

recycling facilities. **Bath 7** Bath Community Academy - It is proposed to allocate the site for educational and community uses and setting out the key redevelopment requirements including providing good access by all modes of transport and ensuring landscape and visual impact is minimised and if possible improved. Bath 6 Weston Island – It is proposed to allocated Weston Island for industrial uses and builders merchants and to include development requirements relating to enhancing the ecological value of the river edge and improve pedestrian/cycle connectivity to and across the site. SSV9 Old Mills - It is proposed to update Policy SSV9 to include additional land that forms part of the Somer Valley Enterprise Zone within the allocated site boundary and broaden the mix of uses appropriate to be developed on site to include offices, eating/drinking establishments, hotel and retail uses. SSV2 South Road Car Park -Sets out options as relates to

Policy SSV2 South Road Car Park

	Site at Midsomer Norton.	

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 and have therefore been included here.

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
LPPU consultation strategy to	Consultation to meet the		Planning Policy Team	
include equality considerations	statutory requirements set out			
within consultation processes.	in the Town and Country			
	Planning Regulations and Bath			
	and North East Somerset			
	Neighbourhood Planning			
	Protocol (Statement of			
	Community Involvement).			
Identified opportunities to support	Lead policy officers to consider		Planning Policy Team	
equality considerations within	equality considerations within			
policy.	policy for the LPPU pre-			
	submission draft plan.			
Viability testing to consider	Viability testing of policy.		Planning Policy Team	
impact of development				
requirements in the LPPU on				

wider planning obligations and		
any equality impacts.		

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: Simon De Beer (Head of Planning) (Divisional Director or nominated senior officer)

Date: 6th January 2021