Equality Impact Assessment Template

Directorate: Place
Service: Planning
Name of Officer/s completing assessment: Jeni Jackson
Date of Assessment: 8 June 2017

Name of service/function or policy being assessed: Borough Local Plan (2013 to 2033), Regulation 19 (publication version for representations to be made regarding soundness and legal compliance)
Proposed local plan for development in the Borough up to 2033. The plan sets out the Council’s strategy for development in the Borough during the plan period, and includes detailed site allocations and policies for development management.

1. What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?

- The Borough Local Plan (BLP) is a key corporate priority and over the last few years the Council has been preparing a new BLP that will provide the development plan to guide the future development of the Borough. It is important that the Council has an up-to-date Local Plan prepared and adopted in accordance with the National Planning Policy Framework (NPPF), published in March 2012.

- The Secretary of State for Communities and Local Government has identified as a key priority the requirement for all local planning authorities to prepare and adopt a NPPF compliant Local Plan without further delay. To that end, the Government has also set a target for all local planning authorities to have submitted a Local Plan to the Secretary of State for independent examination in 2017 but no exact date has yet been set.

- In the event of not achieving that target, the Secretary of State may utilise the statutory powers to intervene in the plan-making process under Part 2 of the Planning and Compulsory Purchase Act 2004 (“the 2004 Act”), which have recently been extended by the enactment of the Housing and Planning Act 2016. In practical terms, this means that the Government could take control
2. Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.

Council wide programme plus external stakeholders including developers and service providers

Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed. Bear in mind that people affected by the proposals may well have more than one protected characteristic.

Age:
Disability:
Gender Reassignment:
Marriage and Civil Partnership:
Pregnancy and maternity:
Race:
Religion and Belief:
Sex:
Sexual orientation:
Other:

Please note that all of the above could be affected by this proposal

3. What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.

The BLP is written for all members of the community and not for specific individuals or groups. As a result it is unlikely to have a disproportionate impact on any particular individual or group. There are however proposals within the BLP which could have positive impacts on some ethnic groups and older people. The present version of the BLP enables groups and individuals to make representations regarding soundness and legal compliance and it incorporates relevant changes from previous Regulation 18 consultation exercises. Details of consultation process are provided in the Statement of Community Involvement 2016 and the Borough Local Plan Regulation 18 Statement on Consultation. Before the BLP policies are adopted, objections will be considered by an
independent inspector appointed by the Secretary of State for Communities and Local Government. The direct impacts of the BLP are therefore subject to extensive consideration.

4. What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?

The BLP will have an impact on all those who live and work in the Borough regardless of age, disability or other protected characteristics. No potentially adverse impacts have been identified for any particular group. The proposed allocations and policies are unlikely to have a disproportionate impact on any particular group because they are not aimed at specific individuals or groups but only at the Borough’s future development. There are however specific policies to meet the accommodation requirements of older persons, gypsies, travellers and travelling showpeople. If these policies are not adopted by the Council, there could be adverse impacts on the living conditions of these particular groups.

5. Have the impacts indentified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).

The Gypsy and Travellers Policy (BLP Policy HO4) provides criteria under which sites can be promoted and delivered by the gypsy, traveller and travelling showpeople communities. Policies in the BLP set out access requirements for pedestrians, vehicles and caravans to and from the highway and requirements for storage and maintenance of show equipment and associated vehicles. These support the needs of gypsies, travellers and travelling showpeople. The BLP supports Lifetime Homes and new homes need to be adaptable to changing life circumstances. BLP Policy HO2 requires developments to provide an appropriate mix of dwelling types and sizes, including wheelchair accessible housing and residential care homes. The BLP sets out policies for provision, enhancement and access to open space, recreation and green infrastructure which will have a positive impact on people’s health and well-being. The BLP sets out policies supporting employment development including small, start-up and large businesses encouraging local employment opportunities and useful services. The BLP states that the Royal Borough will endeavour to make improvements to the education and skills levels of borough residents and seeks to focus community, leisure and cultural facilities in town and district centres to ensure they are accessible to all who need them by a range of transport modes.
6. Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/community groups been involved?

The BLP has been prepared on the basis of consultation responses to the First Preferred Options consultation document (January 2014) and previous draft documents prepared since 2009, and the Draft BLP (Regulation 18)(December 2016) provided the opportunity for the public and stakeholders to respond on the content of policies and proposals. The Council has consulted with everyone on its consultee database by email and/or letter, including the specific consultation bodies and general consultation bodies identified in the Statement of Community Involvement, as well as individual members of the public who requested to be notified of BLP progress. Elected Member briefing sessions have been held throughout the process of preparation of the BLP, to offer Members an opportunity to discuss and comment on previous drafts, specifically through the variously constituted Local Plan Members Working Groups.

Details of the stages of public consultation undertaken are provided in the BLP Consultation Statement (2017).

7. What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?

Generally speaking, implementation of the BLP will seek to reduce adverse impacts on the community which could result from failing to address its needs for development (e.g. new homes and business premises). It is considered that the BLP will not have an adverse impact on any particular group. However, it will be subject to consultation and examination by an independent inspector, to ensure that any adverse impact that is subsequently identified can be mitigated or avoided in its entirety. The BLP consultation database is extensive and includes consultees who represent those with protected characteristics.

It is considered that the Local Plan will not unlawfully discriminate against any group or individual, or provide the grounds for such discrimination.

8. What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.

The Council’s corporate priorities provide a basis for the BLP’s vision, objectives and policies. This means that the BLP is focused on continuing to protect and enhance the special qualities of the Borough’s built, historic and natural environment for the enjoyment of all
its residents, visitors and businesses. The BLP will deliver a community in which the needs of residents for housing will be met and where the vitality and viability in town centres is promoted. The success of the Borough’s distinct visitor economy will continue and the environment will be clean, green and sustainable. The BLP will be monitored annually to ensure that the vision and objectives are being met and that the policies are helping to deliver these priorities.
At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

### What course of action does this EQIA suggest you take? More than one of the following may apply

| Outcome 1: No major change required. The EQIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken | ✓ |
| Outcome 2: Adjust the policy to remove barriers identified by the EQIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan). | ✓ |
| Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EQIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan). | |
| Outcome 4: Stop and rethink the policy when the EQIA shows actual or potential unlawful discrimination. (Complete action plan). | |

### Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

<table>
<thead>
<tr>
<th>Action</th>
<th>Target Groups</th>
<th>Lead Responsibility</th>
<th>Outcomes/Success Criteria</th>
<th>Monitoring &amp; Evaluation</th>
<th>Target Date</th>
<th>Progress to Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>n/a</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Signed

Lead Officer:……………Jenifer Jackson……………..

Date:………8/6/17………

Director:………Russell O'Keefe………………

Date:………8/6/17………