

Equality Impact Assessment / Equality Analysis

(Version 4)

Item name	Details
Title of service or policy	Re-setting the Bath and North East Somerset Local Plan
Name of directorate and service	Planning Policy
Name and role of officers completing the EIA	Alice Nunn, Principal Planning Officer
Date of assessment	13.01.2024

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.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</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>The Council’s Local Plan will establish the planning framework for the district. It will contain a vision, strategy and policies to guide and manage how the District grows and changes over the next 20 years, and how planning applications for new development are decided. It will also help to deliver the Council’s corporate priorities, including improving people’s lives, tackling the climate and ecological emergencies, and preparing for the future in terms of the economy and addressing inequalities.</p> <p>In September 2024 Cabinet agreed that, due to the significant implications of the government’s proposed revisions to the National Planning Policy Framework (NPPF) and standard method housing figure, the Council needs to re-set the work carried out to date on its Local Plan. This EQIA relates to the publication of a Local Plan Rest document, which will update communities and other stakeholders on the re-setting of the Local Plan and set out information on the overall District-wide approach to act as a focus for identifying options for additional development.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p>	<p>The government has published changes to national policy, to achieve sustainable growth through the planning system. This includes changes to the way that housing need is calculated in each local authority area. It results in a very significant uplift in housing numbers – an increase of 105%, from 717 new</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>homes per year to 1,471 new homes per year. Over a twenty-year period, this would equate to over 29,000 new homes. Given the scale of change we are resetting the Local Plan. The document for publication explains the reasoning behind the reset of the Local Plan, and sets out district-wide approaches that the Council could take to identifying options for additional growth.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The Local Plan Reset Document sets out how the Local Plan will seek to meet the Council’s key objectives.</p>

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<p>Planning policy officers have undertaken internal equalities training delivered by B&NES.</p>
<p>2.2 What is the equalities profile of service users?</p>	<p>The profile of service users could include all residents and service users of B&NES. Details regarding the profile of the district’s population can be found in the Strategic Evidence Base report, at https://beta.bathnes.gov.uk/strategic-evidence</p> <p>During the preparation of the Local Plan, the Council is seeking to engage directly with communities and stakeholders across the District, with a direct focus of engagement with target groups identified in the Council’s Statement of Community Involvement.</p>
<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>None applicable.</p>

<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>Prior to resetting the Local Plan the policy team had carried out a significant amount of engagement and consultation with communities, key stakeholders and seldom-heard groups. Resetting the Local Plan doesn't mean starting again – the engagement and consultation carried out to date is still very relevant, and the policy team continue responses carefully. Results of these sessions are available in reports published on the B&NES Local Plan website as follows: https://www.bathnes.gov.uk/local-plan-engagement-and-consultation</p>
<p>2.5 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>Public consultation and community / stakeholder engagement will be undertaken with communities and stakeholders across the District, with a targeted focus on specific groups identified. An updated Local Plan Communications and Engagement Strategy is therefore anticipated to form part of a place shaping engagement strategy which will be published in due course, outlining how and when we propose to engage with communities and other stakeholders in progressing the Local Plan.</p> <p>The policy team do not currently have clear evidence of the demographic make-up of those that respond to consultations. We plan to collate information on age, gender etc of respondents during the next consultation, in order to be able to tailor engagement methods and focus engagement accordingly.</p> <p>Specific equalities considerations relating to publication of the Local Plan Reset Document are set out in section 3 below.</p>

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

Key questions	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>3.1 Issues relating to all groups and protected characteristics</p>	<p>The Local Plan Reset Document seeks to promote equality by setting out the Council’s objectives and aims for the Plan. The Plan will aim to ensure the sustainable development of B&NES for the next 20 years, including the promotion of balanced and inclusive communities that benefit all.</p>	<p>Many of the policies within the Local Plan will benefit the wider community, and not specifically equalities groups. However, some policies will have the potential for some direct or indirect impact on equalities issues, such as provision of housing for older people, housing accessibility standards, sustainable transport for rural communities, and sites for Gypsy and Traveller communities. However, the document for publication at this stage does not go into detail regarding particular policies – it sets out information on the Local Plan reset and potential District-wide approaches to act as a focus for identifying options for additional development.</p> <p>Once decided, the spatial strategy for the district and specific policies will be assessed by future EQIAs as they are developed.</p> <p>See Action Plan for further details.</p>
<p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>As in 3.1 above.</p>	<p>None identified at this stage. Once decided, the spatial strategy for the district and specific policies will be</p>

		assessed by future EQIAs as they are developed.
3.3 Pregnancy and maternity	As in 3.1 above.	None identified at this stage. Once decided, the spatial strategy for the district and specific policies will be assessed by future EQIAs as they are developed.
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	As in 3.1 above.	<p>Authors of documents will ensure that gender neutral language is used.</p> <p>During discussions with any party involved in the preparation of the spatial strategy for the District, offers will seek to not use titles and / or to assume gender identity when speaking to people.</p>
3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	As in 3.1 above.	<p>Targeted engagement has been carried out with disabled people in the preparation of the Local Plan to date. Continued engagement with these groups will ensure their involvement in the preparation of the reset Local Plan.</p> <p>All webinars will be recorded, and the recorded versions will include captions.</p> <p>All videos used for information updates will include captions.</p>

		<p>Officers will be available to respond to email / written queries throughout the preparation of the Local Plan.</p> <p>Council Connect officers use Relay UK to communicate with people who are deaf or hard of hearing over the phone. Planning Officers will respond to queries via Council Connect where necessary.</p> <p>For those with vision impairment, the online version of the Plan and all its supporting documents will be made screen reader friendly. Large print or alternative formats will be available during the consultation period upon request.</p> <p>Those with a learning disability may find reading the documents difficult. An Easy Read version of each of the main consultation documents will be uploaded to the website, alongside the main version of the document. An example of the document uploaded as part of the previous options consultation can be viewed here. The next Easy Read document will likely relate to the Options Document to be published in Summer 2025.</p> <p>See Action Plan for further details.</p>
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<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>As in 3.1 above.</p>	<p>Direct engagement with town and parish council's will be carried out at all stages of the preparation of the Local Plan, and officers shall request that members of such groups advertise events on newsletters and notice boards in order to notify a wide age range of residents, as well as online.</p> <p>See Action Plan for further details.</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>As in 3.1 above.</p>	<p>Individuals from minority backgrounds may be less familiar with written or spoken English. Where requested, summarised translations of Local Plan documents will be provided, as will officer support in contributing responses to the consultation.</p> <p>An Easy Read version of each of the main consultation documents will be uploaded to the website, alongside the main version of the document.</p> <p>See Action Plan for further details.</p>
<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people</p>	<p>As in 3.1 above.</p>	<p>None identified at this stage. Once decided, the spatial strategy for the district and specific policies will be assessed by future EQIAs as they are developed.</p>

<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>As in 3.1 above.</p>	<p>None identified at this stage. Once decided, the spatial strategy for the district and specific policies will be assessed by future EQIAs as they are developed.</p>
<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>As in 3.1 above.</p>	<p>None identified at this stage. Once decided, the spatial strategy for the district and specific policies will be assessed by future EQIAs as they are developed.</p>
<p>3.11 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).</p>	<p>As in 3.1 above.</p>	<p>None identified at this stage. Once decided, the spatial strategy for the district and specific policies will be assessed by future EQIAs as they are developed.</p>
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>As in 3.1 above.</p>	<p>B&NES is in-part a rural district with many communities located away from towns and cities. Some rural communities may have limited public transport options or broadband coverage. Direct engagement with town and parish council's will be carried out at all stages of the preparation of the Local Plan, and officers shall request that members of such groups advertise events on</p>

		newsletters and notice boards, as well as online.
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	As in 3.1 above.	None identified at this stage. Once decided, the spatial strategy for the district and specific policies will be assessed by future EQIAs as they are developed.
<p>3.14 Care Experienced *** This working definition is currently under review and therefore subject to change:</p> <p>In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>	As in 3.1 above.	None identified at this stage. Once decided, the spatial strategy for the district and specific policies will be assessed by future EQIAs as they are developed.

*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.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

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
EQIAs required for future Local Plan strategies and policies.	Prepare and publish EQIAs for spatial strategy and specific policies as they are developed.	Publication of EQIA for policies and strategies set out in the Local Plan and related consultation documents.	Planning policy lead	Ongoing
Policy team do not currently have demographic information relating to who is commenting on consultations.	Collate demographic information from consultation respondents.	Collation of demographic information from consultation respondents.	Policy team and web team	Prior to next Options Consultation
Ensure that engagement material and consultation documents are available on the B&NES website.	Upload all engagement material and consultation documentation to B&NES website.	Upload of relevant documentation.	Planning policy place lead	Various stages
Ensure that all webinars are recorded with captioning.	Ensure that all webinars are recorded with captioning.	Check during webinar set up.	Planning policy lead	Various stages

Ensure that all information videos and uploaded with captions.	Ensure that all information videos and uploaded with captions.	Check before upload to website.	Planning policy lead	Various stages
Policy duty officer to monitor planning policy inbox and either respond to any queries, or send to relevant officer to respond.	Policy duty officer to monitor planning policy inbox and either respond to any queries, or send to relevant officer to respond	Continuous.	Planning policy lead	Continuous
Ensure planning policy officers are aware of Council Connect use of Relay UK.	Discuss at policy team meeting in December.	Discuss at policy team meeting in December.	AN	December team meeting.
Ensure all documents written by the policy team are accessible prior to upload to the website.	Use policy team accessible template to prepare documents and send all documents to web team to carry out accessibility checks.	Prior to publication of any document.	Author of document	Continuous
Ensure that large print or alternative formats can be provided where requested.	Check provision with equalities team.	Prior to publication of any document.	Author of document	Continuous
Prepare Easy Read version of main consultation documents and publish alongside main version.	Prepare Easy Read version of main consultation documents and publish alongside main version.	Prior to publication of any document.	Author of document	Continuous
Officers to ask Parish and Town Council's to display information about engagement and consultations on noticeboards and in newsletters.	Officers to contact Parish and Town Councils.	Send out email to Parishes and Town Councils including request.	Planning policy place lead	Prior to next Options Consultation
Comms team to provide social media updates regarding publication of the reset document.	Comms team to provide social media updates regarding publication of the reset document.	Social media updates.	Comms	Continuous

Ensure the option of a translated document is available. Policy officers to speak to equalities team.	Policy officers o speak to equalities team about availability of translated summaries.	Meeting with equalities team.	Policy and equalities officers	Continuous
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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: Richard Daone, Deputy Head of Planning (Divisional Director or nominated senior officer)
Date: 16th January 2025