

# Appendix 4



## Form to be used for the Full Equalities Impact Assessment

<b><u>Service Area:</u></b> Planning, Sustainable Development, & Regulatory Services	<b><u>Section:</u></b> Planning Policy	<b><u>Date of initial assessment:</u></b> 09 August 2018	<b><u>Key person responsible for assessment:</u></b>	<b><u>Date assessment commenced:</u></b> #####
<b><u>Name of Policy to be assessed:</u></b>	Oxford Local Plan 2036			
<b>1. In what area are there concerns that the policy could have a differential impact</b>	<b><i>Race</i></b>	<b><i>Disability</i></b>	<b><i>Age</i></b>	
	<b><i>Gender reassignment</i></b>	<b><i>Religion or Belief</i></b>	<b><i>Sexual Orientation</i></b>	
	<b><i>Sex</i></b>	<b><i>Pregnancy and Maternity</i></b>	<b><i>Marriage &amp; Civil Partnership</i></b>	
<b>Other strategic/ equalities considerations</b>	<b><i>Safeguarding/ Welfare of Children and vulnerable adults</i></b>	<b><i>Mental Wellbeing/ Community Resilience</i></b>		
<b>2. Background:</b>  Give the background information to the policy and the perceived problems with the policy which are the reason for the Impact Assessment.	<p>The Oxford Local Plan 2036 will be the fundamental development framework for the city of Oxford. The Local Plan will have a material effect on the amount and type of housing (including affordable housing); the number and type of jobs; the location and nature of future development; and the protection of open space; across the city, among other aspects.</p> <p>The scope of the Local Plan and the 20 year time span mean that this document will have a significant impact on the lives of those who live and work in or visit the city. Important choices will be made between competing demands and limited resources will be allocated. The Local Plan will</p>			

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	<p>seek to address inequalities but the policies will need to be assessed for unintended consequences for equality issues.</p> <p>To allow for the best use of resources and ensure that Equality Impact Assessments (EqIA) effectively influence policy development, it was proposed to take a two-phase approach to assessing the Local Plan. The first phase comprised of the initial assessment of the policy areas within the Preferred Options Document. Views on this assessment were sought as part the Preferred Options Consultation in the summer of 2017.</p> <p>The second phase of the Assessment is to look at the policies as they are drafted in the Proposed Submission Document (draft Local Plan). Consultation on this phase of the EqIA will be combined with the next round of public engagement in November 2018. After this stage changes to the policies should only be minor and not materially alter the policies. If significant changes are needed a further phase of the EqIA may be required.</p>
<p><b>3 Methodology and Sources of Data:</b></p> <p>The methods used to collect data and what sources of data</p>	<p>The policies of the draft Local Plan are based on an evidence base comprised of studies on topics such as housing and employment (e.g. the Strategic Housing Market Assessment and Housing and Economic Land Availability Assessment), transport (e.g. the Local Transport Plan and advice from the County Council as the Highway Authority), site analysis (e.g. the Green Infrastructure Assessment and the Green Belt Study) and others including conversations with, and the strategic plans of, infrastructure and service providers.</p> <p>In addition, the most up-to-date available demographic information was taken from sources such as the Census data 2011, population estimates (Office for National Statistics), 2015 Indices of deprivation (DCLG), Experian data, Oxford City Council Housing Information System Database and other national, regional, and local sources of data.</p> <p>The process for producing a Local Plan places great weight on the quality of the evidence supporting policy decisions. The evidence base will be tested through public examination by a Planning Inspector before the Local Plan can be adopted.</p>

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## 4. Consultation

This section should outline all the consultation that has taken place on the EqlA. It should include the following.

- Why you carried out the consultation.
- Details about how you went about it.
- A summary of the replies you received from people you consulted.
- An assessment of your proposed policy (or policy options) in the light of the responses you received.
- A statement of what you plan to do next

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Oxford City Council intends that all sectors of the community have the opportunity to have their say in how their community is planned and developed, irrespective of race; disability; age; religion or belief; gender reassignment; pregnancy and maternity; sex and sexual orientation. Efforts have been made to ensure that the consultation process should be an inclusive one that involves a wide range of community groups.

The Local Plan preparation process has consisted of two consultation exercises thus far. First, a non-statutory early consultation exercise (the First Steps consultation) took place during the summer of 2016. This process was carried out in accordance with the Consultation and Engagement Programme that was approved by CEB in January 2016 and with the Statement of Community Involvement in Planning. The consultation was open to anyone to make comments; at the close of the consultation, 608 responses had been received. The outcomes from this First Steps consultation (as summarised in the Consultation Statement) helped the City Council to prepare the Preferred Options Document.

Upon publication of the Preferred Options document, a second consultation exercise was undertaken in the summer of 2017. This consultation exercise involved a similar practice of outreach and engagement to that of the First Steps consultation. A variety of methods of public engagement were undertaken and aimed to reach a range of groups within the community. This included publicising information through various traditional and social media channels and meeting with the local communities at a variety of types of events (e.g. the Leys Festival, the Cowley Road Carnival, the South Oxford Farmer's & Community Market, etc.). At that stage in the Local Plan project the material that was published was focused on introducing the project (the scope and timetable) and on providing background information and asking questions on the themes and trends that the plan will seek to address. In order to make this information accessible and to engage with a wide range of parties/people and levels of interest a range of materials were produced with different audiences in mind, including leaflets, booklets, topic papers, reports and evidence base documents.

Organisations that represent equalities groups were contacted and invited to comment at both consultation stages, along with local residents and statutory consultees.

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	<p>Both consultation stages raised similar concerns from participants. Respondents raised general concerns about inequality caused by unaffordability of housing in the city and by poor educational attainment. A number of respondents mentioned the strong need for affordable/social housing for those on lower incomes and support for council homes, housing associations and social rented housing. Also, a significant number of respondents stressed that there is the need for more family homes (three bedrooms or more) and homes for older people being built in Oxford.</p> <p>The draft Local Plan seeks to address these issues (including specifically maximising housing delivery, providing more affordable housing, and a range of housing types to meet a range of different population needs) as well as a host of other objectives of the city council to make Oxford a better, healthier, and fairer place to live. The proposed policies will be consulted upon as part of a final consultation exercise commencing in November 2018. This EqIA will be subject to that consultation exercise as well, in addition to being submitted as part of the Oxford Local Plan 2036 for further review by a Planning Inspector.</p>									
<p><b>5. Assessment of Impact:</b> Provide details of the assessment of the policy on the nine primary equality strands. There may have been other groups or individuals that you considered. Please also consider whether the policy, strategy or spending decisions could have an impact on safeguarding and / or the welfare of children and vulnerable adults</p>	<table border="1" data-bbox="667 735 2083 1062"> <tr> <td data-bbox="667 735 1193 850"> <p><b>Race</b> Neutral</p> </td> <td data-bbox="1193 735 1630 850"> <p><b>Disability</b> Positive</p> </td> <td data-bbox="1630 735 2083 850"> <p><b>Age</b> Positive</p> </td> </tr> <tr> <td data-bbox="667 850 1193 957"> <p><b>Gender reassignment</b> Neutral</p> </td> <td data-bbox="1193 850 1630 957"> <p><b>Religion or Belief</b> Neutral</p> </td> <td data-bbox="1630 850 2083 957"> <p><b>Sexual Orientation</b> Neutral</p> </td> </tr> <tr> <td data-bbox="667 957 1193 1062"> <p><b>Sex</b> Neutral</p> </td> <td data-bbox="1193 957 1630 1062"> <p><b>Pregnancy and Maternity</b> Neutral</p> </td> <td data-bbox="1630 957 2083 1062"> <p><b>Marriage &amp; Civil Partnership</b> Neutral</p> </td> </tr> </table> <p><b>Race:</b> No equalities impact identified.</p> <p><b>Disability:</b> The thrust and ambition of the draft Local Plan strives to focus development in locations which are accessible by public transport &amp; non-car modes to make the city more accessible to people of all abilities. The document works to provide better access to community and recreational facilities on a</p>	<p><b>Race</b> Neutral</p>	<p><b>Disability</b> Positive</p>	<p><b>Age</b> Positive</p>	<p><b>Gender reassignment</b> Neutral</p>	<p><b>Religion or Belief</b> Neutral</p>	<p><b>Sexual Orientation</b> Neutral</p>	<p><b>Sex</b> Neutral</p>	<p><b>Pregnancy and Maternity</b> Neutral</p>	<p><b>Marriage &amp; Civil Partnership</b> Neutral</p>
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site and in adjoining areas.

In the preparation of the draft Local Plan, the Council has considered the need to ensure that services and facilities are accessible to all and the need for accessible and adaptable dwellings. Chapter 3 on housing includes a policy related to accessible and adaptable homes. Policy H10 adopts optional Building Regulation requirements M4(2) – Accessible and adaptable dwellings – and M4(3) – Wheelchair user dwellings – that provide enhanced accessibility and adaptability for all new affordable dwellings and for a minimum of 15% of new general market dwellings. It is considered that this policy will result in some positive effects for housing quality for people with disabilities.

Furthermore, Chapter 7 focuses on movement and specifically works (through policies M1, M2, M3, M4, and M5) to support a range of sustainable transport modes; which will provide residents and users of Oxford with a greater range of movement options and make the city more accessible to people of all abilities.

Overall, the effect of the draft Local Plan on the disability equality strand is considered to be positive.

## **Age:**

The thrust and ambition of the draft Local Plan strives to focus development in locations which are accessible by public transport & non-car modes to make the city more accessible to people of all ages. The document works to provide better access to community and recreational facilities on a site and in adjoining areas.

Several of the policies throughout Chapter 3 (which specifically deals with housing) of the draft Local Plan explicitly address the diverse needs of the different age groups in Oxford.

In the preparation of the draft Local Plan, the Council has considered the housing requirements of many different age groups (students, young people, families, adults, elderly people, etc.). Chapter 3 includes specific policies relating to student accommodation (H8), shared housing/Houses in Multiple Occupation (H6), family-sized housing (H4), and extra-care housing (H11) - as they relate

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specifically to different, unique age groups. These policies are considered to have positive impacts upon the cohorts to which they are relevant, without costing others or creating a negative effect on other demographic groups as they all strive to contribute towards establishing a mixed and balanced community (especially policies H4, H6, and H11) which facilitates a healthy environment for the success of all people at all stages of their lives.

Whilst policies H4 and H6 include restrictions upon free-market proliferation of specific housing types, it is not considered that these restrictions negatively impact the relevant target groups (especially young adults/students through policy H6), as the aim and function of the restrictions is to ensure mixed and balanced communities in which all cohorts of age groups benefit from a healthier social mix. The potential self-segregation/selection of communities by age group through the unfettered forces of market demand is considered to be more likely to have a negative effect on specific age groups than ensuring their healthy mix throughout the city as a whole.

Chapter 7 focuses on movement and specifically works (through policies M1, M2, M3, M4, and M5) to facilitate sustainable transport modes as alternatives to private car use; which will make the city more accessible to people of all ages.

Further policies in Chapter 8 of the draft Local Plan (which relates to communities, facilities, and the vibrancy of Oxford) are specifically targeted at protecting, retaining, and encouraging facilities needed for general health and wellbeing of all types of age demographics (policies V5 and V7). Policies specifically relating to utilities (policy V9), as well as infrastructure, and cultural and community facilities (V7), will seek to ensure that the relevant services and infrastructure are available to support development and are delivered at a timely stage.

Overall, the effect of the draft Local Plan on the age equality strand is considered to be positive.

### **Gender reassignment:**

No equalities impact identified.

### **Religion or Belief:**

It is considered that the draft Local Plan will have a neutral effect on people due to their religious

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beliefs.

The main issue is considered to be the likely implications of the draft Local Plan for the completion and provision of religious buildings in Oxford as well as the protection of existing community facilities that may be used as places of worship.

Chapter 8 in the draft Local Plan chapter relates to communities, facilities, and the vibrancy of Oxford. The chapter includes policies specifically relating to infrastructure, and cultural and community facilities (policies V5 and V7). Policy V7 defines community facilities as including community centres, schools, children's centres, meeting venues for the public or voluntary organisations, public halls and places of worship, leisure and indoor sports centres, pavilions, stadiums, public houses, club premises, arts buildings that serve a local community, as well as other buildings that serve a community purpose. The policy specifically sets out to protect and retain community facilities, as well as support the expansion and improvement of community facilities. The larger section of the Local Plan supports social infrastructure to meet the needs of the population, including that for religious and other broader community activities. Beyond that, the draft Local Plan does not provide any greater benefit for any specific religion or for any beliefs system compared to none, so in this sense it is considered to be neutral.

**Sexual orientation:**

No equalities impacts identified.

**Sex:**

No equalities impacts identified.

**Pregnancy and Maternity:**

No equalities impacts identified.

**Marriage & Civil Partnership:**

No equalities impacts identified.

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<p><b>6. Consideration of Measures:</b></p> <p>This section should explain in detail all the consideration of alternative approaches/mitigation of adverse impact of the policy</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">270</p>	<p>Full risk assessments were completed of all the policy options coming out of the Preferred Options consultation. These risk assessments identified all possible negative effects and implications of the potential policy options. The findings of these risk assessments were then used to inform choice of policy approaches, and to refine and develop the policy options and approaches into fully fleshed policies. Where potential adverse impacts were raised and/or identified, policy approaches were changed or adapted, or measures of mitigation were internalised into the final written policy.</p> <p>Furthermore, the draft Local Plan has been informed by the separate Sustainability Appraisal of the Local Plan. The Sustainability Appraisal considers the social, economic, and environmental effects of the Local Plan, and ensures that, as far as possible, it accords with the principles of ‘sustainable development’. A number of the sustainability objectives relate to relevant social issues, such as meeting local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home; improving health and well-being and reducing inequalities in health; reducing poverty and social exclusion; reducing disparities in education, developing opportunities for everyone to acquire the skills needed to find and remain in work; reducing crime and the fear of crime; and creating and sustaining vibrant communities.</p> <p>The final policies included in the Proposed Submission Local Plan are present after having due regard, as required by section 149 of the 2010 Equality Act, to the need to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic<sup>1</sup> and persons who do not share it.</p>
<p><b>6a. Monitoring Arrangements:</b></p> <p>Outline systems which will be put in place to monitor for adverse impact in the future and this should include all relevant timetables. In addition it could include a summary and</p>	<p>A general monitoring framework to check the implementation of the Local Plan is set out in the Proposed Submission Document. The Council will monitor the implementation and impact of the Local Plan through the Annual Monitoring Report.</p> <p>In addition, on-going community engagement through the implementation of the Local Plan (e.g. through developer engagement at pre-application/application stages) will help to provide a greater understanding of the potential impacts on equalities groups, to inform the final design options and</p>

<sup>1</sup> The relevant protected characteristics are race; age; disability; religion or belief; gender reassignment; pregnancy and maternity; sex; sexual orientation



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assessment of your monitoring, making clear whether you found any evidence of discrimination.	details.				
<b>7. Date reported and signed off by City Executive Board:</b>	#####				
<b>8. Conclusions:</b>  What are your conclusions drawn from the results in terms of the policy impact  271	The Local Plan will seek to deliver specific types of development and at specific locations. As such, there is the potential for the policies to have differential impacts on different equalities groups. Development at any site could have equality implications for new residents and users/workers within the site, and also communities in adjacent areas. The extent to which control over these potentially different impacts can be exercised varies. Overall, draft Local Plan policies have been designed to attempt to improve the relevant equality strands where possible, and to otherwise have a neutral impact. More specifically, it is not anticipated that there will be a direct impact on equality issues related to gender reassignment, sex, sexual orientation, pregnancy and maternity, or religion and beliefs as a result of the policies and development proposed in the Local Plan; whilst it is considered that the policies and resulting development patterns of the Local Plan are likely to have some positive effect on the age and disability equality strands.				
<b>9. Are there implications for the Service Plans?</b>	YES/NO	<b>10. Date the Service Plans will be updated</b>	#####	<b>11. Date copy sent to Equalities Lead Officer</b>	#####
<b>13. Date reported to Scrutiny and Executive Board:</b>	#####	<b>14. Date reported to City Executive Board:</b>	#####	<b>12. The date the report on EqIA will be published</b>	#####

Signed (completing officer)

Signed (Lead Officer)

**Please list the team members and service areas that were involved in this process:**

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Assistant Planner  
Planning Policy  
John van Veghel

Team Leader  
Planning Policy  
Sarah Harrison

Equalities Lead Officer  
Legal Services Manager  
Lindsey Cane

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