



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

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<b>Service Area:</b> Planning Services		<b>Section:</b> Planning Policy	<b>Date of Initial assessment:</b>	<b>Key Person responsible for assessment:</b> Joseph Sorrell	<b>Date assessment commenced:</b>	
<b>Name of Policy to be assessed:</b>			Oxford Local Plan 2040			
<b>1. In what area are there concerns that the policy could have a differential impact</b>			<b>Race</b>		<b>Disability</b>	
			<b>Gender reassignment</b>		<b>Religion or Belief</b>	
			<b>Sex</b>		<b>Pregnancy and Maternity</b>	
<b>Other strategic/ equalities considerations</b>			<b>Safeguarding/ Welfare of Children and vulnerable adults</b>		<b>Mental Wellbeing/ Community Resilience</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 2040 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</p>			

	<p>choices will be made between competing demands and limited resources will be allocated. The Local Plan will 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 influences policy development, it was proposed to take a two-phase approach to assessing the Local Plan. The first phase comprised the initial assessment of the policy areas within the Preferred Options Document. Views on this assessment were sought as part of the Regulation 18 Part 1 Consultation, which took place in October/November 2022.</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 2023. 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 used.</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 Housing and Economic Needs Assessment and Housing and Economic Land Availability Assessment), transport (e.g. the Central Oxfordshire Travel Plan and advice from the County Council as the Highway Authority), site analysis (e.g. the Green Infrastructure Assessment and the Green Belt Study update) 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 and 2021 releases, population estimates (Office for National Statistics), 2019 Indices of Multiple 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</p>

	a Planning Inspector before the Local Plan can be adopted.
<p><b>4. Consultation</b></p> <p>This section should outline all the consultation that has taken place on the EIA. It should include the following:</p> <ul style="list-style-type: none"> <li>• Why you carried out the consultation.</li> <li>• Details about how you went about it.</li> <li>• A summary of the replies you received from people you consulted.</li> <li>• An assessment of your proposed policy (or policy options) in the light of the responses you received.</li> <li>• A statement of what you plan to do next.</li> </ul>	<p>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.</p> <p>The Local Plan preparation process has consisted of two consultation exercises thus far. First, a non-statutory early consultation exercise (the Issues consultation) took place during the summer of 2021. This process was carried out in accordance with the Statement of Community Involvement in Planning that was approved by Cabinet in June 2021. As Covid-19 restrictions were still in place at this time, opportunities to hold events in public were limited, which meant that methods of communication such as social media were particularly important. A leaflet was delivered door-to-door to residents with an attached questionnaire that could be returned using Freepost, though responses could also be submitted via email or an online version of the questionnaire. The consultation was open to anyone to make comments; at the close of the consultation, 1,143 responses had been received. The outcomes from this Issues consultation (as summarised in the Consultation Statement) helped the City Council to prepare the Preferred Options Document.</p> <p>Upon publication of the Preferred Options document, a second consultation exercise was undertaken in the autumn of 2022. This consultation exercise involved a similar practice of outreach and engagement to that of the Issues consultation, with a short leaflet questionnaire delivered door-to-door across the city (approximately 46,000 properties). An online version of this short questionnaire was also made available for those who preferred to use this method. Due to some delays in receiving completed questionnaires caused by postal distribution problems, the deadline for responses was extended until the first week of January 2023. A variety of methods of public engagement were undertaken and aimed to reach residents, workers, employers, students and visitors to Oxford, as well as stakeholders and service providers. This included publicising information through various traditional and social media channels and meeting with the local communities at a number of 'drop-in'</p>

sessions at various locations across the city, attended by members of the Planning Policy team. 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 policy proposals developed following the previous consultation. 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. At the close of comments, 1,427 responses had been received to this questionnaire.

In addition to the short questionnaire, stakeholders and members of the public were also invited to complete a more in-depth structured online questionnaire if they preferred.

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

Both consultation stages highlighted matters that are important for the future development of Oxford. These included concerns about high housing costs, the need to build well-designed homes that enable us to achieve net zero, ensuring our city and district centres remain vibrant and ensuring that people have access to employment opportunities, public open space and community, cultural and social facilities. The consultations also brought into focus the importance of ensuring Oxford's resilience to threats such as climate change, through the maintenance of biodiversity and green space. The draft Local Plan aims to address these issues through its vision and policies which seek to make Oxford a healthier, more inclusive, and more resilient place for those living and working here.

A further technical consultation focusing on the issue of Local Plan housing need was organised in the spring of 2023. This was considered a necessary approach in the light of the decision taken not to progress with the Oxfordshire Plan 2050. Those who responded to the first Preferred Options consultation (and consented to be contacted with further updates) were notified, while the consultation was also advertised through social media channels. **A report summarising the responses to this consultation is currently being prepared.**

	<p>The proposed policies will be consulted upon as part of a final consultation exercise commencing in November 2023. This EqlA will be subject to that consultation exercise as well, in addition to being submitted as part of the Oxford Local Plan 2040 for further review by a Planning Inspector.</p>
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**5. Assessment of Impact:**

Provide details of the assessment of the policy on the six 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.

**Race**

Neutral

**Disability**

Positive

**Age**

Positive

**Gender reassignment**

Neutral

**Religion or Belief**

Neutral

**Sexual Orientation**

Neutral

**Sex**

Neutral

**Pregnancy and Maternity**

Neutral

**Marriage & Civil Partnership**

Neutral

**Race:** No equalities impact identified.

**Disability:** 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 abilities. This ambition forms one of the overarching threads within the document, which seeks to foster a liveable city in which residents have access to the basis of their daily needs within an easy walking distance of their homes. In doing so, the document works to protect provision of to community and recreational facilities.

In the preparation of the draft Local Plan, the Council has considered the need for accessible and adaptable dwellings, and the need to ensure that services and facilities are accessible to all. Chapter 6 on design includes Policy HD14 - Accessible and Adaptable Homes - which adopts optional Building Regulations requirement M4(2) to provide enhanced accessibility and adaptability for all new affordable dwellings and for a minimum of 15% of new general market dwellings. This policy also adopts Building Regulations requirement M4(3) for dwellings for wheelchair users, for a minimum of 5% of all dwellings for which the City Council is responsible for allocations or nominations on sites of more than 20 dwellings. It is considered that this policy will result in some positive effects for housing quality for people

with disabilities. Furthermore, the policies contained in Chapter 7 focus on movement and work 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:** Several of the policies throughout Chapter 2 (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 2 includes specific policies relating to student accommodation (H9 and H10), boarding school accommodation (H16), shared housing/Houses in Multiple Occupation (H8), family-sized housing (H6) and older persons and other specialist accommodation (H13), as they relate specifically to different age groups. These policies are considered to have positive impacts upon the cohorts for which they are relevant, without costing others or negatively affecting other demographic groups, as they all strive to contribute towards establishing a mixed and balanced community which facilitates a healthy environment for the success of all people at all stages of their lives.

Whilst policies H6, H8 and H9 include restrictions upon the free-market proliferation of specific housing types, it is not considered that these restrictions negatively impact the relevant target groups (particularly young adults/students through policies H8 and H9), 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 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 7 of the draft Local Plan relating to communities, facilities, and the vibrancy of Oxford's city and district centres, are specifically targeted at protecting, retaining, and encouraging facilities needed for the general health and wellbeing of all age demographics (policies C2, C3, C4 and C5).

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 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 7 in the draft Local Plan chapter relates to communities, facilities, and the vibrancy of Oxford. The chapter includes Policy C4, which specifically refers to non-residential institutions, including places of worship. The policy sets out to protect and retain non-residential institutions, including places of worship, unless it can be clearly demonstrated that they are no longer required to meet the community's needs. In addition, this policy supports the expansion and improvement of such facilities. The Local Plan more broadly 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.



	<p><b>Sex:</b> No equalities impacts identified.</p> <p><b>Pregnancy and Maternity:</b> No equalities impacts identified.</p> <p><b>Marriage &amp; Civil Partnership:</b> No equalities impacts identified.</p>
<b>6. Consideration of Measures:</b>	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

<p>This section should explain in detail all the consideration of alternative approaches/mitigation of adverse impact of the policy.</p>	<p>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 assessment of your monitoring, making clear whether you found any evidence of discrimination.</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 details.</p>
<p><b>7. Date reported and signed off by City Executive Board:</b></p>	
<p><b>8. Conclusions:</b></p> <p>What are your conclusions drawn</p>	<p>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 both for new residents and</p>

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

from the results in terms of the policy impact.	<p>users/workers within the site, and for communities in adjacent areas. The extent to which control over these potentially different impacts can be exercised varies.</p> <p>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.</p>				
<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 EqlA will be published</b>	

Signed (completing officer)

Signed (Lead Officer)

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

Assistant Planner  
 Planning Policy  
 Joseph Sorrell

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