



## Appendix 4: Full Equalities Impact Assessment

<b>Service Area:</b> Planning & Regulatory Services		<b>Section:</b> Planning Policy	<b>Date of Initial          assessment:</b> 25/04/2017	<b>Key Person responsible for          assessment:</b>  <b>Mark Jaggard</b>	<b>Date assessment commenced:</b>		
<b>Name of Policy to be assessed:</b>		Oxford Local Plan Preferred Options					
<b>1. In what area are there concerns          that the policy could have a          differential impact</b>		<b>Race</b>		<b>Disability</b>		<b>Age</b>	
		<b>Gender reassignment</b>		<b>Religion or Belief</b>		<b>Sexual Orientation</b>	
		<b>Sex</b>		<b>Pregnancy and Maternity</b>		<b>Marriage &amp; Civil Partnership</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 purpose of the Preferred Options Document is to set out proposed planning policy direction for the Oxford Local Plan 2036. 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 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</p>					

<p style="text-align: center; vertical-align: middle;">210</p>	<p>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>The Preferred Options Document includes a number of policy options that are proposed for guiding development in Oxford. It is considered that the potential impacts of these policies on the nine primary equality strands that should be evaluated as the Local Plan project progresses.</p> <p>To allow the best use of resources and ensure that Equality Impact Assessments (EqIAs) effectively influence policy development it is proposed to take a two-phase approach to assessing the Local Plan. The first phase comprises of this initial assessment of the policy areas within the Preferred Options Document. Views on this assessment will be sought as part the Preferred Options Consultation.</p> <p>The second phase of the Assessment will look at the policies as they will be 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 June 2018. After this stage changes to the policy should only be minor and not materially alter the policy. 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 policy options of the Preferred Options Document 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 an independent Planning Inspector appointed by government before the Local Plan can be adopted by the Council.</p>
<p><b>4. Consultation</b></p> <p>This section should outline all the consultation that has taken place on the EqlA. 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 engagement and consultation process should be an inclusive one that involves a wide range of community groups. Support in relation to adoption of a best practice engagement and communications approach has been provided to the team developing this document.</p> <p>No consultation on the EqlA has taken place so far and the Plan preparation process has consisted of a non-statutory early consultation exercise (the First Steps consultation) that took place between June and August of 2016. This process has been 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.</p> <p>This consultation involved a variety of methods of public engagement 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 or the South Oxford Farmer’s &amp; Community Market). 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.</p> <p>The outcomes from this First Steps consultation as summarised in the Consultation Statement have</p>

helped the City Council to prepare the Preferred Options Document. Organisations that represent equalities groups were contacted and invited to comment at this initial consultation stage, along with local residents and statutory consultees. The consultation was open to anyone to make comments; at the close of the consultation, 608 responses had been received.

At the First Steps consultation some 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.

The Preferred Options Document contains a site of preferred options to address these issues including maximising housing delivery, providing more affordable housing and a range of housing types to meet a range of different population needs. These options will be tested through a second stage of consultation in the Summer of 2017 before they are drafted into planning policies in the Proposed Submission Document.

#### 5. Assessment of Impact:

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

<b>Race</b>	<b>Disability</b>	<b>Age</b>
Neutral	Positive	Positive
<b>Gender reassignment</b>	<b>Religion or Belief</b>	<b>Sexual Orientation</b>
Neutral	Neutral	Neutral
<b>Sex</b>	<b>Pregnancy and Maternity</b>	<b>Marriage &amp; Civil Partnership</b>
Neutral	Neutral	Neutral

**Race:**

No equalities impact identified.

This issue will be the subject of further consideration in the full EqIA of the Proposed Submission Local Plan.

**Disability:**

In the preparation of the Preferred Options document the Council has considered: the need to ensure that services and facilities are accessible to all and the need for accessible and adaptable dwellings. It includes a preferred option to adopt the optional Building Regulations requirements (Part M) that replaced the Lifetime Homes Standard. It is considered that the Preferred Options document has some positive effects for people with disabilities.

This issue will be the subject of further consideration in the full EqIA of the Pre-Submission Local Plan.

**Age:**

Some of the preferred options in the Local Plan will explicitly address the diverse needs of the different age groups in the community.

In the preparation of the Preferred Options document the Council has considered the housing requirements of the different age groups (from students and young people to families and the older population). This results in policy directions on student accommodation, shared housing, family sized housing and extra care housing. The document focuses development in locations which are accessible by public transport/non car modes to make the city more accessible to people of all ages. It facilitates sustainable transport options as alternatives to private car use, and better access to community and recreational facilities on the site and in adjoining areas.

The provision of services and infrastructure is also key for example ensuring access to school places and play facilities for the younger age groups and to GP surgeries particularly for the older age groups. Policy areas such as those relating to primary healthcare, access to education, infrastructure and developer contributions will seek to ensure that the relevant services and

infrastructure are available to support development and are delivered at a timely stage.

This issue will be the subject of further consideration in the full EqIA of the Proposed Submission Local Plan.

**Gender reassignment:**

No equalities impact identified.

This issue will be the subject of further consideration in the full EqIA of the Proposed Submission Local Plan.

**Religion or Belief:**

It is considered that the 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 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.

The chapter of the Preferred Options Document entitled: “Ensuring Oxford is a vibrant and enjoyable city to live in and visit and providing facilities and services” sets out that community facilities can include community centres, children’s centres, meeting venues for the public or voluntary organisations, public halls and places of worship, leisure centres, pavilions, stadiums, public houses, club premises or arts buildings that serve a local community. This section of the Local Plan supports social infrastructure to meet the needs of the population including that for religious and other broader community activities. It is considered that this part of the Plan will have a positive effect upon this particular equality strand. However the Preferred Options Document 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.

This issue will be the subject of further consideration in the full EqIA of the Proposed Submission Local Plan.

**Sexual orientation:**

No equalities impacts identified.

<p style="text-align: center;">215</p>	<p>This issue will be the subject of further consideration in the full EqlA of the Proposed Submission Local Plan.</p> <p><b>Sex:</b> No equalities impacts identified. This issue will be the subject of further consideration in the full EqlA of the Proposed Submission Local Plan.</p> <p><b>Pregnancy and Maternity:</b> No equalities impacts identified. This issue will be the subject of further consideration in the full EqlA of the Proposed Submission Local Plan.</p> <p><b>Marriage &amp; Civil Partnership:</b> No equalities impacts identified. This issue will be the subject of further consideration in the full EqlA of the Proposed Submission Local Plan.</p>
<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>The Preferred Options Document has been informed by the separate Sustainability Appraisal of the Local Plan. The Draft 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 Proposed Submission Document will set out the proposed final policies of the Plan, which will be further influenced by the Final Sustainability Appraisal and the full EqlA. This final EqlA will look at all individual planning policies in the Pre-Submission Document and will identify any policies and</p>

	<p>proposals that could have a differential impact on the nine equality strands. The final policies will be included in the Proposed Submission Local Plan 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 will be 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>15<sup>th</sup> June 2017</p>
<p><b>8. Conclusions:</b></p> <p>What are your conclusions drawn from the results in terms of the policy impact</p>	<p>Because the Local Plan will seek to deliver specific types of development and at a specific location, then there is the potential for the policies to have differential impacts on different equalities groups. Development at the site could have equality implications for new residents and users/workers within the site, and also communities in adjoining areas.</p> <p>Overall, at this stage of the Plan preparation, 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 as a result of the policies and development proposed in the Local Plan. The policies of the Plan are likely to have some positive effect on the following equality strands: age and disability. Further assessment of the Proposed Submission Document for the Local Plan in 2018.</p>

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



<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)

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

Equalities Lead Officer  
 Service Manager  
 Lindsey Cane, Legal Services Manager

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