Equality impact assessment form

Part 1: screening form

Name of activity to be assessed	Regulation 19: Pre-submission Draft of the Elmbridge Local Plan
Completing officer's name	Zoe Belton
Service area/team	Planning & Environmental Health - Planning Policy & Strategy Team
Date completed	May 2022

Quality control

EIA checked by (name of line manager):	Suzanne Parkes, Planning Policy & Strategy Manager
Date approved:	19 May 2022

Aims and objectives

The purpose of an Equality Screening form and Impact Assessment is to improve the work of the council by making sure that we promote equality and do not discriminate. This ensures that individuals and teams consider the likely impact of their work on residents and take action to improve.

What is the main purpose of this strategy/policy/function/project/activity?
The main purpose of this activity is to present the new Local Plan to the community and key stakeholders for representations under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2021. The representation period will run for six-weeks. The council's new Local Plan sets out how communities and places within the borough will develop over the next 15 years (up to 2037). It includes policies and site allocations to guide the development and use of land, as well as defining the areas of the borough that will be protected and enhanced. Once adopted, the Local Plan will replace the 2011 Core Strategy and 2015 Development Management Plan and will form the basis on which planning applications in the borough will be determined.

Elmbridge
Borough Council
... bridging the communities ...

Having considered national planning policy and guidance as well as case law, feedback from the previous Regulation 18 consultations, updated evidence and the direction from Members of Local Plan Working Group, the council have now progressed the Local Plan to the last stage of public engagement. We will then submit the draft plan, supporting documents and the representations received to the Inspectorate for examination. This is a formal process that requires representations on the soundness and legal compliance of the plan.

What outcomes do you want from this strategy/policy/function/project/activity?

The council's main outcome is to seek representations on a new Local Plan for the borough that is legally compliant and sound and responds to the following key challenges:

- Tackling climate change and moving towards a low / zero carbon economy;
- Protecting and enhancing the natural environment;
- Managing a step-change in providing an increase in homes supported by the necessary infrastructure;
- Delivering more affordable homes;
- Supporting local recovery from Covid-19; and
- Supporting our town, local and district centres and employment areas

Responses will be collated and sent directly to the Planning Inspector for consideration and in preparation of the Independent Examination.

Could the outcome be different if you are from a particular group?

Every policy in the Local Plan is intended to positively impact all residents, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. However, some policies are designed to remove or minimise disadvantages suffered by people due to their protected characteristics. Additionally, the Local Plan has taken steps to meet the needs of people from protected groups where data shows their needs are different from the needs of other people.

For information, the Local Plan includes the following three strategic policies which sets out the spatial strategy:

SS1- Responding to the climate emergency
SS2- Sustainable place-making
SS3- Scale and Location of growth

These are then followed by detailed policies that are grouped together by the five principles of the plan which seek to deliver the Plan's vision. These are:

Principle 1: Tackling climate change
Principle 2: Protecting and enhancing the quality of the environment
Principle 3: Delivering homes
Principle 4: Growing a prosperous economy
Principle 5: Proving infrastructure and connectivity.

Even though all five principles will help to improve the health and wellbeing of the whole community, the assessment below highlights those strategic and detailed policies that impact specific groups.

Impact on specific groups

Assess where you think the activity could have an impact on any of the groups.

	Positive impact	Negative impact	No impact	Reason and justification
Age The Elmbridge Equalities Plan 2017-2022 states that the age structure is as follows: Age 0-17 years 23.8% Age18-64 years 59.8% 65+ years 16.3% The number of very elderly (85+) has increased from 2977 in 2011 to 3662 in 2011. The Local Housing Market Assessment, 2020 states that by 2037 the number of those aged 65 or over in Elmbridge is projected to be 35,500. This represents a 37% increase on 2020 figures, with the expected rate of increase of the 75 or over and 85 or over groups in the population projected to be higher, at 46% and 80% respectively. The Surrey-I Joint Strategic Needs Assessment states that Elmbridge has the highest proportion of under 5 year olds and children aged 5 to 16 in the population of Surrey. (The Surrey Context - People and Place, 2019)	☒	☐	☐	SS3- Scale and Location of growth supports the delivery of long-term broad locations for development which includes the higher education college at Brooklands and specialist care at Whiteley Village. These developments will benefit young people seeking education and the elderly with specialist care requirements. Policy ENV3- Local Green Spaces will have tangible social benefits such as promoting healthier lifestyles and encouraging social interaction. This will benefit younger people and the older population. ENV8- Air Quality has a positive impact on all age groups, but especially the elderly, as it ensures development proposals do not have detrimental effects on resident's health. The urban design policy (ENV9) seeks to ensure new development promotes community togetherness and well-being which is multi-generational which would have a positive impact across the age groups but particularly older people that may feel isolated. The Plan seeks to ensure that additions to the future housing

	Positive impact	Negative impact	No impact	Reason and justification
				stock reflect local need and provide housing choice (HOU3- Housing Mix). However, it is important that the housing stock is able to adapt to meeting the requirements of an ageing population as set out in Policy HOU5 (Housing Technical Standards). HOU4 – Affordable Housing requires that on appropriate development schemes, 25% of affordable homes must be in the form of First Homes. This is to assist, in particular, younger generations access the housing market which, given affordability issues is a key challenge for the borough. HOU6- Specialist Accommodation will positively impact the elderly as it aims to meet local needs which is affordable and accessible. Care provision at Whiteley Village will also be supported. Policies ECO1 and 2 safeguard employment land which will provide access to local jobs for the working population. ECO3 – Supporting our town, district and local centres will have a positive impact on the working population for job opportunities and provide access to facilities and services to older people in addition to opportunities for social interaction as our centres evolve into community hubs. The Social and Community uses policy (INF2) has a positive impact on all age

	Positive impact	Negative impact	No impact	Reason and justification
				groups but particularly younger residents who will benefit from education, training, social and leisure facilities. Additionally, older groups will also benefit from community uses such as day centres which offer a range of activities. Community facilities that are accessible is also positive for both young people and the elderly that do not have access to a car and multi uses can be in operation. Local Plan Policy INF3- Health and wellbeing of communities provides policy on active design principles which support the well-being of all age groups but particularly the older population. INF4- Play and informal recreation space has a positive impact on children and young people with regard to physical health, wellbeing and development.
Gender reassignment	☐	☐	☒	It is not considered that the Draft Local Plan will impact positively or negatively on this specific group.
Marriage and civil partnership	☐	☐	☒	It is not considered that the Draft Local Plan will impact positively or negatively on this specific group.
Pregnancy and maternity	☒	☐	☐	Policy INF2 will resist the loss or change of use of existing social and community uses. This will have a positive impact on this group as these facilities can provide important local services such as pregnancy clinics, breast feeding groups and baby classes. The Health and Well-being policy (INF3) states that policies will be expected to provide active design

	Positive impact	Negative impact	No impact	Reason and justification
				principles and access to sustainable modes of transport, green infrastructure and local community facilities, all of which will encourage opportunities for social interaction, physical exercise and safe access to key services. Keeping active and connecting with others during maternity leave and accessing key health services during pregnancy and maternity leave is important for this specific group.
Disability *Defined as - if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities e.g. you may need someone to help you or you use a piece of apparatus.* The Local Housing Market Assessment 2020 states that a gradual increase in the number of people with mobility disabilities is forecast between now and 2035, particularly of those aged 65 plus, where a 41% increase is expected, as well as a 4% increase among working age people.	☒	☐	☐	SS3- Scale and Location of growth supports the delivery of long-term broad locations for development and this includes specialist care at Whiteley Village, which will benefit the elderly with disabilities. Policy SS3 also supports the repurposing of retail floorspace and this is most likely to be by converting excess retail space to create mixed-use destination schemes including residential. Managing the change is likely to require temporary and flexible meantime/pop-up uses. This may impact disabled residents, who may not be able to travel for amenities. To mitigate this, the council will encourage and support a range of retail services in the borough's town, village and local centres. (EC03). Policy ENV9- Urban design quality states that development should be accessible and must pay attention to access which is important for this specific group. The upcoming Local Design Code will provide more guidance on achieving

	Positive impact	Negative impact	No impact	Reason and justification
				accessible development and is referred to in the policy.

Despite the plan's support of higher density smaller units to meet housing need in the urban area, which could have a negative impact on this group, HOU5- Housing technical standards ensure liveable, functional, adaptable and accessible new homes are delivered. To meet the needs of those people with mobility and accessibility needs, targets from building regulations are reinforced.

HOU6- Specialist Accommodation aims to deliver suitable specialist homes to cater for the needs of more vulnerable members of society as well as people with disabilities, mental health problems and long-term conditions, including those who have developed or may develop care needs as they become older.

ECO3- Supporting our town, district and local centres. The loss of retail, office, leisure and community uses at ground floor level to residential in the core activity area will be resisted which will have a positive impact on residents with disability, ensuring that access to these services is maintained.

Policy INF3 -Health and Well-being of communities aims to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles. Planning should also provide |

	Positive impact	Negative impact	No impact	Reason and justification
				the social, recreational and cultural facilities and services the community needs. This is particularly important for the older population and people with disabilities.
Race *Including colour, nationality (including citizenship), ethnic or national origins*	☒	☐	☐	Policy HOU7 (Gypsy, Roma, Traveller and Travelling Showpeople accommodation) is a specific criteria-based policy that will permit additional pitches on existing sites and windfall pitches provided applications meet the criteria of the policy. These criterions aim to protect this community from pollution, flooding, noise, odour and vibration. They also ensure sites are accessible to key services, public transport and schools. Existing authorised sites will also be safeguarded unless no longer needed. This policy aims to protect this community's safety, health and well- being, which has a positive impact on people from this ethnic group. The Local Plan is not considered to impact on existing or future residents' colour or nationality.
Religion, belief or lack of religion/belief The 2011 census shows us that: • 64.2% of the population of Elmbridge identify as Christian • 1.8% as Muslim • 1.2% as Hindu • 1.9% as having another religion • 23.4% as having no religion	☒	☐	☐	Policy INF2 seeks to ensure that existing social and community infrastructure provision in the borough is protected and only lost in exceptional circumstances. This will benefit groups of the community that use halls to practice their religion.

	Positive impact	Negative impact	No impact	Reason and justification
Gender According to the ONS mid-year population estimates for 2020, 48.4% of Elmbridge's population is male and 51.6% is female. Although there is no local data on women and girl's safety in public spaces in the borough, nationally 70% of women and girls have experienced sexual harassment in public. (2021, UN Women UK website)	☒	☐	☐	SS2 – Sustainable Place- Makes it very clear that new development must create safe and inviting environments. This will have a positive impact on women and girls as national data states that the urban environment can feel unsafe for this specific group. Policy ENV9 states that particular attention must be paid to security and crime prevention measures. Additionally, that public and private space should be safe and secure with opportunities for natural surveillance. This will help women and girls feel safer.
Sexual orientation There is no statistically reliable data on the proportion of Elmbridge residents who declare themselves LGB (Equalities Plan 2017-2022).	☐	☐	☒	There is no evidence that the Draft Local Plan will impact positively or negatively on this specific group.

Please provide details of any other impacts on other groups, for example:
- those living in deprived areas
- those facing exclusion
- households on low incomes
- young people in transition to adulthood
- those with low education achievement
- vulnerable workers
- those with barriers to employment
- vulnerable and isolated older people
- carer's and ex-offenders

The Local Plan's Spatial Strategy (SS3) is for a brownfield approach using opportunities to develop previously developed land and land within the urban area as they offer the most sustainable locations. However, this strategy will not meet the borough's local housing need in full. It may also find providing a housing mix, particularly affordable housing, difficult due to the limited land available in the urban area. This could have a negative impact on households on low incomes ability to access affordable housing. There is no mitigation for not meeting housing need in full but optimising the density of development in the urban area (HOU2) and ensuring

proposals provide affordable homes on all residential developments (HOU4) will help boost housing delivery and provide affordable units.

SS3 includes supporting the delivery of long-term broad locations for development. This includes Lower Green, Esher which is considered an area of relative deprivation in Esher. The Local Plan contains policies to ensure all new development is accessible, inclusive and sustainable which will help those living in certain areas access key services. Those living in Lower Green includes children and younger people who would benefit from policies enhancing play spaces and recreational use (INF4), encouraging an active and healthy lifestyle (INF3) and educational provisions such as development at Brooklands College (SS3). The policy will support the delivery of the regeneration and renewal of these areas.

Policy ENV3- Local Green Spaces states that areas designated as Local Green Space on the Policies Map will be protected from development, other than where the development is to enhance the Local Green Space's function or use, or where very special circumstances can be demonstrated which clearly outweigh the harm to the Local Green Space and any other harm arising from the proposal. This will have a positive impact on all groups but particularly vulnerable and isolated people who can use these public spaces to socially interact. Urban design quality will also have a positive impact on this group because it promotes community togetherness and wellbeing by creating sustainable spaces and environments that are well-managed and maintained, accessible, inclusive and multi-generational.

Policies on the mix of homes (HOU3) and affordable homes (HOU4) close to town, district and local centres as well as train stations (HOU2- Optimisation of sites) will benefit all groups including vulnerable and isolated older people, those with barriers to employment and young people in transition to adulthood. INF5- Communications will ensure better access to the internet for all but it will particularly help those with barriers to employment who would benefit from having access to online job searching sites.

If you have indicated that there is a **negative** impact on any group, are these of a high impact? High impact means it is discriminatory against one or more groups	N/A
Comments	N/A

Sources of information

Engagement carried out:	The Council has undertaken the following three Regulation 18 consultations:
	• Strategic Options consultation- December 2016 to February 2017
	• The Options consultation- August to September 2019
	• Creating our vision, objectives and the direction for development management policies -January to March 2020

	The Consultation statements which set out who was consulted, and the feedback received are available to view using the links above. There have been other public engagement activities such as call for sites exercises and Local Green Space identification.
Data used	Elmbridge Borough Council Equalities Plan, 2017-2022 Elmbridge Knowing Our Communities, 2017 Surrey-I Website- The Surrey Context -People and Place, 2019 Settlement Assessment, 2020 Local Housing Market Assessment, 2020 Local Insight profile for 'Lower Green Larger Area' area, LI- Surrey Council, 2021 UN Women UK: www.unwomenuk.org/safe-spaces-now

Next steps

If the impact is high and/or of **negative impact** then a full assessment is required, please complete parts 2 and 3 on the following pages of this form.

If a full impact assessment is **not required,** then you should not complete parts 2 and 3 of this form.

Part 2: full assessment

An Equality Impact Assessment is a tool that enables you to assess your service, activity or policy. Where disproportionate negative impact and/or unlawful impact is identified, the assessment provides a means to take the appropriate steps to avoid or mitigate this.

Data and research

Exploring available data and conducting research will help to give an indication as to what impact the strategy will have on equality and diversity. Where data is limited or unavailable, you should identify this as a limitation and identify ways to overcome this.

Consider the following:

- Publicity, including design, distribution and accessible communications issues
- Physical access
- Location, geography
- Poverty, deprivation and social exclusion issues
- Community Safety
- Direct discrimination: does the activity intentionally exclude a particular equality group? If so, is this exclusion justified?
- Consultation, involvement and engagement
- Monitoring and evaluation

Lack of data may make completing this section difficult, but is not be a reason to halt the process.

What data is available to help complete your EIA?

Are there any gaps in data that may require further research or consultation?

What additional research or consultation is needed to investigate the impacts of your activity?

Have you consulted any internal teams when completing your EIA?

Impact on specific groups

	Positive impact	Negative impact	No impact	Reason, including details of impact and mitigation
Age – Older people	☐	☐	☐	
Age – Younger people and children	☐	☐	☐	
Gender reassignment – transmen and transwomen	☐	☐	☐	
Marriage and civil partnership – people who are married or in a civil partnership	☐	☐	☐	
Pregnancy and maternity – mothers or women who are pregnant	☐	☐	☐	
Disability* - physical	☐	☐	☐	
Disability* - sensory	☐	☐	☐	
Disability* - learning	☐	☐	☐	
Disability* - long-term health impairment	☐	☐	☐	
Race**	☐	☐	☐	
Religion, belief or lack of religion/belief	☐	☐	☐	
Gender - women	☐	☐	☐	
Gender - men	☐	☐	☐	
Sexual orientation – heterosexuals, lesbians, gay men and bisexuals	☐	☐	☐	

* Defined as - if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities e.g. you may need someone to help you or you use a piece of apparatus.
** Including colour, nationality (including citizenship), ethnic or national origins

Part 3: action plan

Monitoring and reviewing

What data do you have that monitors the impact of the activity on protected groups? How is this data used?

If there is no data, explain how you intend to continue monitoring the impact of this activity.

Use the table below to record how you will minimise or remove any negative impact

Issue	Action	Timescale for completion	Milestones/success criteria