Equality Impact Assessment

Stage 1: Relevance Screening

1. Introduction

1.1 Service:	Planning	
1.2 Name of proposal, policy, strategy or project being assessed:	Local plan Core Strategy Review March 2024	
1.3 This is:	Other	
	If other, please specify:	
	A review of current local plan policies to consider whether any need to be updated at this time	
1.4 Completing officer's name:	Tanya Mankoo-Flatt	
1.5 Date Screening completed:	01/03/2024	
1.6 Signed off by:	Head of Service name: Andrew Benson	
	Date: 05/03/2024	

2. About the proposal

2.1 What is the main purpose of the proposal?

Please explain in one or two short paragraphs

To consider whether the current adopted policies of the Council's local plan Core Strategy remain up to date and effective for decision making.

2.2 Why is it being introduced / reviewed / changed now?

This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.

The local plan Core Strategy policies, adopted by the Council in 2024 to plan for the Borough's strategic development needs between 2012 and 2027, are being reviewed due to a national legal and policy requirement (under the Local Planning Regulations and NPPF Dec 2023) to complete a review of local plans every five years from adoption and to be updated as necessary.

If the Council decides that the local plan polices do not need to be updated, we must publish the Review including reasons for this decision within 5 years of the adoption date of the plan (noting that if some policies need updating but others do not, lists of both types of policies may be published).

2.3 Who could be affected by your proposal?

This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.

service user needs, or for financial reasons.			
	a. Will the proposal introduce a change which will affect how services or functions are delivered?	No	If yes, please identify which group(s): Choose an item.

^{**} Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project **

b. Will the proposal affect	No	Please briefly explain your answer:
people - service users, employees or the wider community?		Click or tap here to enter text.

3. Assessment of relevance

3.1 Who is the intended audience or target group(s) for the proposal and/or which group(s) of people might be affected?		
Internal audience or group: Choose an item.		
External audience or group: Multiple (please specify below)		
If other or multiple, please specify. Residents, local businesses, developers, landowners		
Please provide more details about the target audience or affected group(s), for example how many people will be affected and the likely extent of the impact: The local plan includes three types of policies for the Borough and which aim to meet the identified needs for development to 2027 in a sustainable manner whilst protecting important aspects of the Borough, including its nationally important landscape (Surrey Hills AONB), the Metropolitan Green Belt within the Borough, built heritage, etc. The policies are spatial strategy policies (CS1 to CS5), place-shaping policies (CS6 to CS9) and cross-cutting policies (CS10 to CS18).		

3.2 Evidence and engagement

What information have you used to assess the proposal for its relevance to equality?

This may be data or evidence or engagement information collected and held by the Council, or by external parties.

General Borough-level and workforce information is available at www.reigate-banstead.gov.uk/equality

Consideration of Equality Information: Borough Characteristics 2024;

2021 census date;

the 2024 local plan Core Strategy Review, including monitoring data on effectiveness of its policies.

The Core Strategy Equalities Impact Assessment March 2009

3.3 Protected characteristics Could the proposal affect people with any protected characteristics? Please indicate which by ticking the relevant boxes. Note that 'other vulnerability' is not a protected characteristic but should be considered in addition.		
Age ⊠	Race or ethnicity ⊠	
Disability ⊠	Religion or belief (or lack of) \square	
Gender reassignment □	Sex ⊠	
Marriage or civil partnership □	Sexual orientation □	
Pregnancy and maternity □	Other vulnerability (inc deprivation) ⊠	

3.4 Aims of the Equality Duty
Which of the aims of the Equality Duty are relevant? Please indicate by ticking the relevant boxes.
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the
Act (disadvantages suffered by people due to their protected characteristic) □

Advance equality of opportunity between those who share a protected characteristic and those who do not (where the needs of people from protected groups are different from the needs of other people)
Foster good relations between people who share a protected characteristic and those who do not (encouraging protected groups to participate in public life or in other activities where their participation is disproportionately low)
4. Conclusions
4.1 Relevance ranking Please identify in this section the degree to which the proposal has been assessed as relevant to equality
High: The proposal shows a high degree of relevance to one or more protected characteristic and/or one or more aim of the Equality Duty \Box
Moderate: The proposal shows a moderate degree of relevance to one or more protected characteristic and/or one or more aim of the Equality Duty \boxtimes
Low: The proposal shows a low degree of relevance to one or more protected characteristic and/or one or more aim of the Equality Duty \Box
None: The proposal is not relevant to any protected characteristic or any aim of the general equality duty \Box
4.2 Explaining a ranking of Low or None If your assessment has identified low or no relevance to equality, please explain the reasons for this conclusion below, referencing the information you have used to inform your decision.
Click or tap here to enter text.
4.2 Further analysis Please identify in this section whether your relevance screening demonstrates the need for further equality analysis
The relevance assessment has identified a high or medium relevance ranking, and an Equality Impact Assessment is required ⊠
The relevance assessment has identified a low or no relevance ranking, and in consideration of the evidence above, an Equality Impact Assessment is not required \Box

Stage 2: Impact Assessment

You should complete this form if your Stage 1 Relevance Assessment has indicated that an Impact Assessment is needed.

Data and evidence

In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:

- Relevant information about service users held by your service
- Relevant information about staff (eg, the workforce equality information published on the <u>website</u>, staff surveys etc)
- Relevant information about borough residents (eg the borough equality information published on the website, service user surveys etc)
- Relevant information published by third party organisations (eg data, research studies etc). This could include (but is not limited to) the <u>Census</u>, <u>Office for National Statistics</u> or <u>Joint Strategic Needs</u> Assessment
- Feedback or information from organisations representing target equality groups

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2 Outcomes of Stage 1 Relevance Assessment

2.1 Have you completed a Stage 1 Relevance Assessment for this proposal? If 'No' please complete one before proceeding further with the Stage 2 assessment.	
Yes	
If yes, what date was the Stage 1 assessment completed? 12/02/2024	

2.2 Please indicate which protected characteristics the relevance assessment identified as relevant to the proposal being assessed

Age ⊠	Race or ethnicity ⊠	
Disability ⊠	Religion or belief (or lack of) \square	
Gender reassignment □	Sex ⊠	
Marriage or civil partnership □	Sexual orientation □	
Pregnancy and maternity □	Other vulnerability (inc deprivation) 🗵	
2.3 Please indicate which aims of the Equality Duty the relevance assessment identified as relevant to the proposal being assessed		
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act (disadvantages suffered by people due to their protected characteristic) \Box		
Advance equality of opportunity between those who share a protected characteristic and those who do not (where the needs of people from protected groups are different from the needs of other people)		
Foster good relations between people who share a protected characteristic and those who do not (encouraging protected groups to participate in public life or in other activities where their participation is disproportionately low) \square		

3. About the proposal

3.1 What is the main purpose of the proposal?

Please explain in one or two short paragraphs

The proposal reviews the existing local plan Core Strategy policies (which over the period 2012-2027) to consider whether they remain up to date and effective for continued use for the purposes of assessing planning and related applications for development and planning appeals.

3.2 Why is it being introduced / reviewed / changed now?

This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.

The Council is legally required to review its local plan policies at least once every 5 years starting from the date of their adoption. The local plan Core Strategy was adopted 3 July 2014. Its review in 2019 found its policies remained up to date and effective and did not need updating. Should the Council agree this current local plan Core Strategy review, it will be published on the Council's website.

4. About the customer, audience or target group(s)

4.1 Who is the intended audience or target group(s) for the proposal or which group(s) of people might be affected? Internal audience or group: Staff and councillors External audience or group: Multiple (please specify below) If other or multiple, please specify. Please also use the section below to provide more details about the audience or target group(s):

Local residents, businesses, community groups, those using the Borough for recreation.

4.2 Will the proposal intentionally target any particular protected characteristic group? Yes If yes, please identify for this and what the Yes	the group and explain the reason intended impact is.
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Whilst some of the local plan Core Strategy policies are aimed at protecting the Borough's natural and historic environment, including for public access leisure opportunities, other policies aim to ensure a variety of housing and economic opportunities are provided for to serve the whole of the Borough's population.

Policy CS5: Valued people and economic development aims to identify and improve the Borough's Regeneration Area to deliver economic, social and environmental improvements to those areas and their residents.

Policy CS6: Allocation of land for development gives priority and focuses development and improvements within the identified regeneration areas of the Borough being the areas with the highest deprivation.

Policy CS7: Town and Local Centres focuses on directing shops and services towards these accessible areas for the benefit of all communities including minimising the need to travel for goods and services and provision of accessible local services.

Policy CS12: Infrastructure Delivery protects community (including health and education) and leisure (sport, cultural and open space) infrastructure to support the Borough's residents and workers. It also requires new developments in the Borough to contribute towards provision of new infrastructure to support the growing resident and working population of the Borough.

Policy CS14: Housing Needs of the community aims to ensure that new developments provide a range of housing to meet the diverse housing needs of the local community. This includes specifically, elderly people, people on low incomes, people with mobility and / or other disabilities.

A range of housing relates to housing types, sizes, and tenure.

Policy CS15:Affordable Housing was superseded by DMP Policy DES6 in September 2019 aims to meet the needs of residents and workers in the Borough who are on lower incomes potentially due to disability, age, or deprivation.

Policy CS16: Gypsies, travellers and travelling showpeople aims to ensure suitable housing is provided within the Borough to meet the needs of ethnic gypsies and travellers who wish to residents in housing that relates to their ethnic needs.

Policy CS16 also protects existing authorised sites from other (potentially higher land value) uses where they are needed in order to ensure continued suitable housing sites remain in the Borough for gypsy and traveller families.

Policy CS17: Travel options and accessibility looks to ensure that a variety of non-car transport infrastructure is available, including bus, rail, and cycling and walking infrastructure.

This policy will help to ensure that residents, workers and visitors to the Borough can accesses transport suitable to their needs, be it people with mobility, visual

		or other disabilities; elderly people; and people with lower incomes who may not have access to a car.
4.3 Will the proposal intentionally exclude any particular protected characteristic group?	No	If yes, please identify the group and explain the reason for this and any direct or indirect impact on that group. No
4.4 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?	Yes, Improve outcomes	Please briefly explain your answer. Yes For the reasons outlined in section 4.2 above.

4.5 What information do you have about the protected characteristics of the intended audience or group(s) of people who might be affected and what does it tell you? Please refer to any information you hold within your service, evidence from consultation or engagement, information from the Council's Borough and Workforce Equality Information, or external data sources such as the Census, Office for National Statistics or Joint Strategic Needs Assessment.

If you have no inf	ormation, state 'none'.
Age	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024
	Summary: The 2021 census recorded 17.71% of the Borough's residents being aged 65 and over, compared to the average for England and Wales of 18.56%, and 21.54% of the Borough's population being aged 16 and under compared to 19.61% nationally. The population's age profile varies considerably across the Borough, with Banstead Village having the highest proportion of population aged 65 or over (25.11%) and the lowest proportion aged 16 or under (15.90%). Conversely, only 11.09% of Redhill East's population was aged 65 or over, and South Park & Woodhatch has almost one quarter of its population (24.79%) aged 16 or under.
	The type of housing built in the Borough is one of the factors that influences the ages of who can stay living in the Borough and who decides to move to the Borough.
Disability	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024
	Summary: The 2021 census recorded 13.97% of the Borough's population as being disabled under the Equality Act, i.e. their day to day activities are limited either a little or a lot by their health.
Gender reassignment	Information source(s): N/A
	Summary: Click or tap here to enter text.
Marriage and	Information source(s): N/A
civil partnership	Summary: Click or tap here to enter text.
Pregnancy and	Information source(s): N/A
maternity	Summary: Click or tap here to enter text.
Race or ethnicity	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024 Traveller Caravan Count (twice yearly data returns to government) in January and July each year to provide local data on winter and summer residences records the number of traveller caravans but not the number of occupants residing in them.

	Summary: The 2021 Census data provides the most recent information about the residents Borough population. This includes Irish and Scottish travellers and Romany gypsies (0.18% of the Borough's population in 2021, i.e. about 272 people from a population at the census time of approximately 150,852). This may well be an under-recording. Core Strategy Policy CS16 sets out the criteria that were used to identify sites to allocate through the DMP, and to determine planning applications relating to unallocated sites. The DMP adopted in 2019 allocates sites sufficient to meet the full need for traveller accommodation identified in the 2017 Reigate & Banstead Gypsy and Traveller Accommodation needs Assessment (GTAA).
Religion or	Information source(s): N/A
belief (or lack of)	Summary: Click or tap here to enter text.
Sex	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024
	Summary: The 2021 census recorded 51% of the Borough's population as being female and 49% as male, with 0.35% identified as a different sex / gender to that registered at birth. This is consistent with a government estimate in 2018 from the government's Equalities Office of between 0.3% and 0.75% of the national population. Cities are likely to have high representation.
Sexual	Information source(s): N/A
orientation	Summary: Click or tap here to enter text.
Other vulnerability	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024
(please state)	Summary: Data on deprivation indicators is collected at Lower Super Output Area (LSOAs) level. This includes indicators such as "income", life expectancy" "employment", "health & Disability", "crime", "employment" The government uses published data collected together into an "Index of Multiple Deprivation" (IMD) tool. The IMD ranks LSOAs Of the 317 local authorities in England, R&B was ranked 276 (1 being the most deprived), and so as a whole, the borough scores well in terms of deprivation. Well over half (57.06%) of the borough's households are not deprived in any indicator / dimension. However, this masks areas within the Brough can still face significant challenges with deprivation issues.
	Within the Borough, deprivation indicators were scored highest in central Horley, Merstham, South Park and Woodhatch, and south Tattenham.
	Just under one third (30.83%) households were deprived in one indicator / dimension.
	2.22% of households were deprived in three or four dimensions.
	Parts of Merstham, which were in the top 20% most deprived areas nationally for older people's income deprivation. Parts of Preston were ranked in the top 30% on this indicator. Parts of Merstham were also in the were in the top 20% for income deprivation

affecting children, as well as parts of Preston and Redhill. Parts of South Park and Woodhatch and Horley in the top 30%.

Parts of Merstham, Preston, Redhill and Horley ranked in the top 30% nationally for health deprivation and disability indicators.

4.6 If you have identified any information gaps that make it difficult to assess the impact of your proposal on people, please explain what the gaps are and explain how those gaps can be filled in the future.

Click or tap here to enter text.

4.7 Has there been any consultation with relevant interested parties or is any consultation planned?

This could include consultation, further evidence gathering or changing or amended the proposed approach. Give consideration to both consultation within the Council (eg staff) and outside the Council (eg residents).

Yes, already undertaken

If yes, please explain the nature of the consultation that has been undertaken or is planned. If no, please explain why consultation is not considered necessary. How were protected characteristic groups consulted or how will they be consulted?

These policies have been subject to public and stakeholder consultation throughout their preparation between 2004 and 2013m, including a public examination of the policies by a government inspector.

4.8 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities? This could include changing or amending the proposed approach.

None. As noted below, the adopted Core Strategy policies have neither a positive or neutral impact on people with protected characteristics, and the policies were adopted in July 2014 to cover the plan period to 2027. The legal requirement is to review the policies at least every five years, which the Council did in 2019 and is now doing again. As the Review of the local plan Core Strategy found that the policies remain effective and consistent with national policy, there is no need for the adopted policies to be updated at this time.

4.9 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities? This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances

As identified the Core Strategy policies adopted in 2014 all have a positive or neutral impact on people with protected characteristics. No negative impacts have been identified, either in this Equalities Impact Assessment or in the 2009 Equalities Impact Assessment for this Core Strategy Review.

5. Assessment of potential impact

Information about the protected characteristic groups as defined by the Equality Act is available <u>here</u>. You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.

Considering the above information, please summarise the likely impact on protected characteristic groups (within the organisation, outside the organisation or both) This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information.

information.	information.				
5.1 Age including children, yo	oung people or older people				
Does your assessment indicate a disproportionate negative impact relation to Age?	No				
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.				
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.				
Does your assessment indicate a positive impact relation to Age?	Yes				
If yes, please describe the nature of the positive impact(s)	See section 4.2 above, particularly relating to increasing options for suitable housing and transport for elderly residents and visitors and local shops that provide local shops and service in communities				
5.2 Disability including physical, sensory or learning disability or long-term health impairment					
Does your assessment indicate a disproportionate negative impact relation to Disability?	No				
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.				
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.				
Does your assessment indicate a positive impact relation to Disability?	Yes				
If yes, please describe the nature of the positive impact(s)	See section 4.2 above, particularly Policies CS4 relating to ensuring greater opportunity for provision of suitable housing and CS17 relating to transport options				
5.3 Gender reassignment					
Does your assessment indicate a disproportionate negative impact relation to Gender reassignment?	No				

If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Gender reassignment?	No
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.
5.4 Marriage and civil partn	ership
Does your assessment indicate a disproportionate negative impact relation to Marriage and civil partnership?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Marriage and civil partnership?	No
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.
5.5 Pregnancy and materni	ty
Does your assessment indicate a disproportionate negative impact relation to Pregnancy and maternity?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact	No

relation to Pregnancy and maternity?				
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.			
5.6 Race or ethnicity				
Does your assessment indicate a disproportionate negative impact relation to Race or ethnicity?	No			
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.			
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.			
Does your assessment indicate a positive impact relation to Race or ethnicity?	Yes			
If yes, please describe the nature of the positive impact(s)	Specialist housing provisions are made for ethnic gypsy and travellers in Core Strategy Policy CS16, as explained in section 4.2 above			
5.7 Religion or belief or lack	cof			
Does your assessment indicate a disproportionate negative impact relation to Religion or belief?	No			
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.			
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.			
Does your assessment indicate a positive impact relation to Religion or belief?	No			
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.			
5.8 Sex				
Does your assessment indicate a disproportionate negative impact relation to Sex?	No			

If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Sex?	Yes
If yes, please describe the nature of the positive impact(s)	As set out in Section 4.2 above
5.9 Sexual orientation	
Does your assessment indicate a disproportionate negative impact relation to Sexual orientation?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Sexual orientation?	No
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.
5.10 Other vulnerability	
Does your assessment indicate a disproportionate negative impact relation to any other vulnerability?	No
If yes, please specify the vulnerability and describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to any other vulnerability?	Yes

If yes, please specify the vulnerability and describe the nature of the positive impact(s)

Policy CS6: "Allocation of land for development" gives priority and focuses development and improvements within the identified regeneration areas of the Borough, being the areas with the highest deprivation, with South Park and Woodhatch now also included. The "Regeneration Areas" identified in Policy CSD6 remain the areas subject to higher indicators of deprivation, including in some areas multiple deprivations.

Important:

Any disproportionate negative impacts must be drawn to the attention of the decision-maker (for example the relevant Board or Committee).

In the event that there are disproportionate negative impacts identified and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed

6. Monitoring and review

6.1 How do you propose to monitor the impact of your proposal and keep track of the delivery of any identified actions to address disproportionate negative impact? Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and who will be responsible for this monitoring.

The published Core Strategy Monitoring Framework 2014 and annual Monitors regularly monitor the impact that the Core Strategy policies are having, including performance against the Strategy's objectives and targets.

6.2 Please outline what the mechanisms for review of the impact of your proposal will be? (for example if any negative impact is found to be occurring) Include detail of review frequency and who will be responsible for the review.

Click or tap here to enter text.

This is expected to be the last review of these local plan Core Strategy polices, as the plan period ends in 2027.

Preparation of a new local plan started in 2023, and will include consideration of potential Equalities Impacts of policies on people with protected characteristics as they emerge, offering the opportunity to mould the policies to improve their effect on Borough residents, workers and visitors through the iterative process of writing the policies. As set out in the Council's *Statement of Community Involvement (SCI) in Planning* 2019, updated 2024, we will make particular efforts to get information on the production of the new local plan to those who are not often heard from, including people whose might not speak or write English, busy working people who may not see the local plan as affecting them.

Information on poverty and other indicators of deprivation will be considered in re-assessing the Borough's communities most at need of targeted spatial planning policies, including any geographic areas in need of regeneration.

This will be informed by on-going informal engagement, as well as through two formal consultation with a variety of individuals and organisations living or otherwise having an interest in the future development and protection of the Borough.