<table>
<thead>
<tr>
<th><strong>Equality Analysis Report</strong></th>
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<tbody>
<tr>
<td><strong>Title of activity / Budget Proposal title and number</strong></td>
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<tr>
<td>Bedford Borough Local Plan 2035</td>
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<td><strong>Service area</strong></td>
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<td>Environment, Planning</td>
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<td><strong>Approved by</strong></td>
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<tr>
<td>Jon Shortland</td>
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<td>Chief Officer Planning and Highways</td>
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**Description of activity:**

Following the publication of the National Planning Policy Framework, the Council is required to produce an up-to-date, comprehensive local plan that looks ahead for the next 15 years.

The new Local Plan 2035 will set out the overarching strategy for housing and employment development in the borough. It will also deal with site allocations and land designations in the borough, apart from those already identified in the Allocations and Designations Local Plan and sites for minerals and waste development which are allocated through a separate Minerals and Waste Local Plan.

With the formal revocation of the Regional Spatial Strategy, the government has abolished the regional tier in the planning system and the new local plan must no longer conform to regional targets for housing and employment. Instead it must for the first time set out objectively assessed local need for housing and broadly matching employment provision. However, it must be consistent with the National Planning
Policy Framework and a range of other national policies and guidance documents that the government has published.

The new local plan will replace old and out of date policies contained in the Core Strategy and Rural Issues Plan 2008, the Bedford Town Centre Area Action Plan 2008, the Allocations and Designations Local Plan 2013 and the saved policies of the Bedford Borough Local Plan 2002.

**Summary of activity:**
As a first step in the preparation of the local plan the Council prepared and consulted on an Issues and Options Paper in 2014. This set out varying levels of growth and 5 options for spatial distribution. Potential development site submissions were invited to help the Council identify available land supply for the plan period.

A further consultation was undertaken in 2015 after the completion of a number of important studies. Views were sought on a vision, levels of growth, the plan’s strategy, and methodologies for selecting development sites and local green spaces. Further potential development site submissions were invited. Several technical documents were published for consultation in 2016.

In response to the 2015 consultation a number of additional potential development sites were submitted. This included four potential new settlement locations. The 2017 consultation offers an opportunity for residents and others with an interest to comment on the Council’s preferred development strategy. It includes one or more new settlements as well as other locations for growth, focussed in and around the urban area and the larger rural villages.

A third consultation in 2018 invited comments on a preferred development strategy and updated the plan’s evidence base (and particularly the assessment of need for additional growth) to take account of revised population and household forecasts. It invited comments on the draft selection of potential local green spaces.

The 2018 consultation relates to the Local Plan 2035 ‘Plan for Submission’. Residents and others with an interest will have the opportunity to support, object to or comment on the Plan. Following this stage the Plan will be submitted to the Planning Inspectorate to be examined in public.

Please refer to the Equality Analysis Template Notes for guidance on completing this form.
**Relevance Test**

1. The outcomes of the activity directly and significantly impact on people, e.g. service users, employees, voluntary and community sector groups.  
   - Yes [X]  
   - No  
   - √  
   - ☐

2. The activity could / does affect one or more protected equality groups.  
   - Yes [X]  
   - No  
   - ×  
   - ☐

3. The activity could / does affect protected equality groups differently.  
   - Yes [X]  
   - No  
   - ×  
   - ☐

4. One or more protected equality groups could be disadvantaged, adversely affected or are at risk of discrimination as a result of the activity.  
   - Yes [X]  
   - No  
   - ×  
   - ☐

5. The activity relates to an area where there are known inequalities.  
   - Yes [X]  
   - No  
   - ×  
   - ☐

6. The activity sets out proposals for significant changes to services, policies etc. and / or significantly affects how services are delivered.  
   - Yes [X]  
   - No  
   - ×  
   - ☐

7. The activity relates to one or more of the three aims of the Council's equality duty.  
   - Yes [X]  
   - No  
   - ×  
   - ☐

8. The activity relates to the Council’s Corporate Plan objectives, is a significant activity and / or presents a high risk to the Council’s public reputation.  
   - Yes [X]  
   - No  
   - ×  
   - ☐

9. An equality analysis of this activity is required.  
   - Yes [X]  
   - No  
   - ×  
   - ☐

This activity has no relevance to Bedford Borough Council's duty to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations. An equality analysis is not needed.

**Scope of equality analysis**
| Who is / will be impacted by the activity's aims and outcomes? | The issues covered in the Local Plan 2035 will impact on all residents in the Borough in addition to those who work in or visit Bedford. Accordingly, it may potentially affect all members of the community who are covered by the protected characteristics as defined by the Equality Act 2010. These include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership groups as well as those with multiple protected characteristics.

The local plan will result in new development happening in a planned way and the changes taking place throughout the plan period may affect residents, visitors and employees across the borough in a variety of ways, for example through new housing or employment development, new schools, new shops, roads, railway stations or cycle ways and open spaces. The plan's development strategy will lead to policies that change the character of land so that residents, visitors and employees within or near areas where growth is concentrated and land allocated for development may experience increased economic and social opportunity. Conversely, decreased environmental opportunity may potentially be experienced by residents and employees as a result of the adverse effects of development, such as reduced air quality or increased noise and traffic.

The new local plan will also explain how provision will be made for Gypsies and Travellers. A study has been completed to determine Gypsy and Traveller and Travelling Showpeople accommodation needs over the plan period. Whilst Gypsies and Travellers for planning purposes are defined in terms of their nomadic life style, Romany Gypsies and Irish Travellers are legally recognised as ethnic groups and therefore also protected by legislation. For the purpose of this Equality Analysis, Gypsies and Travellers are considered within the context of race groups.

Primary stakeholders for the new local plan include, in particular, residents, businesses, employers and employees, community groups, landowners, developers and the statutory consultation bodies for local plans. |
| Which particular protected equality groups are likely / will be affected? | The proposed development strategy involves a focus on growth in the urban area of Bedford and Kempston, particularly on brownfield sites. In the urban area the population is on average much younger, likely to include a higher proportion of mothers and mothers-to-be and comprise a larger proportion of faith and BME communities. In addition, the urban wards Castle, Harpur, Cauldwell, Kingsbrook, Kempston North and Goldington that are amongst the 20% most deprived nationally are located in the urban area of Bedford and Kempston.

It may therefore be considered that race groups, pregnancy and maternity groups, the younger age groups and those suffering from deprivation may potentially be disproportionately affected by planned growth as a result of their geographic concentration in the urban area. |
### What evidence have you used to analyse the effects on equality?
- Population Census 2001 and 2011, ONS
- Census and Statistics Information, BBC
- Joint Commissioning Strategy for People with Physical Disabilities 2010-2013, BBC / NHS
- Bedfordshire Black and Minority Ethnic Accommodation Needs Study 2003, De Montfort University
- Indices of Deprivation 2013, BBC
- Gypsy and Traveller Accommodation Assessment 2016
- Equality monitoring information of consultation across the wider Council in 2011
- National research reports
- Core Strategy and Rural Issues Plan 2008
- Bedford Town Centre Area Action Plan 2008
- Allocations and Designations Local Plan 2013
- Bedford Borough Economic Development Strategy 2011-14
- Bedford Borough Growth Plan 2013
- Strategic Housing Market Assessment, ORS 2016

### What consultation did you carry out with protected equality groups to identify your activity’s effect on equality?
In the past this is an issue discussed with the Diversity Network. Specific groups also register their interest with the Council by asking for their details to be placed on the Local Plan email alert list. Discussions have also taken place with the Policy and Partnerships Manager to better understand how to engage with protected groups.

### What does this evidence tell you about the different protected groups?
**General**
The borough is home to an estimated total of 157,800 residents (in 2011) who make up approximately 65,800 households. Population numbers have increased by approximately 6.5% from 148,100 in 2001. Estimates are that the Borough’s population will increase to more than 170,000 in 2021, an increase of approximately 8% between 2011 and 2021.

**Age**
The population of the urban area is much younger on average than the rural area, with only 45% of the population aged 40+ compared to 56% in rural areas. Whilst borough wide the population is forecast to increase by 7% between 2014 and 2021, the number of people 65+ is forecast to increase by 16% and the
number of people 85+ is forecast to increase by 32% over the same period. Between 2014 and 2037 the Borough's population is forecast to rise by 21% with increases of 67% and 156% for the 65+ and 85+ age groups respectively. This will represent a significant ageing of the population.

Disability
In Feb 2016 6,420 people claimed Disability Living Allowance and 3,595 people claimed Attendance Allowance. In 2011 16% of the Borough's population reported that they had a long term illness. Additionally in 2015 it was estimated that there were 2,414 adults with a learning disability and that this number will rise to 2,615 by 2030.

The prevalence of physical disability increases with age. The highest percentages are found in older age groups so as population growth is expected to be concentrated in older age groups there is likely to be an increase in the proportion of disabled people. There is no evidence that disabled people are concentrated in any particular part of the urban or rural area and it is assumed that they are randomly distributed.

Gender reassignment
78.3% of all respondents to consultations across the wider Council in 2011 indicated that their gender was still the same as it was at birth. There is no evidence that this proportion is representative of the borough and that members of this group are concentrated in any particular area. It is assumed that they are randomly distributed.

Pregnancy and maternity
Between 2001 and 2007 the number of births in the Borough increased gradually, but rose significantly in 2008-2010. This can be largely attributed to mothers born outside the UK who accounted for 78% of the total increase between 2001 and 2010. Although the number of births to mothers born in the New European Union countries (countries which joined the EU in 2004) has increased greatly since 2004, the number of births to mothers born in Asia remains the largest group. This group, together with mothers born in Africa and the rest of the world, makes up 60% of total births. Therefore the distribution of the pregnancy and maternity group is assumed to largely mirror that of Black and Minority Ethnic (BME) groups (see below).

Race
The 2011 Census indicates that 23.5% of the Borough's population is from around 100 different Black and Minority Ethnic (BME) groups (defined as all ethnic groups other than White British). This compares to 20.2% in England (though only 13.9% when the London Boroughs are excluded) and 14.7% in the East of England. The Borough's BME population increased significantly between 2001 and 2011, while the White British
population declined by almost 6,900. There were substantial increases in all BME groups, including Asian and Asian British (48.6%) and Black and Black British (61.3%). In 2001 the BME population was concentrated in the urban area and particularly in the wards of Queens Park (57.8%) and Cauldwell (43.6%).

Gypsies and Travellers experience multiple disadvantages as is demonstrated by indicators relating to health, education and other issues. The existing Gypsy and Traveller community is located on the Council’s own sites at Kempton Hardwick (22 pitches), at Willow Drift Meadow Lane (14 pitches) and a number of privately owned sites in the rural area. The 2016 based Gypsy and Traveller Accommodation Assessment evidences need for Gypsy and Traveller pitches to 2035. It will also evidence need for Travelling Showpeople plots.

Religion or belief
The 2011 Census indicated that religious belief for the borough was as follows: Christian 59.3%, Muslim 5.5%, Hindu 1.5%, Sikh 2.1%, Jewish 0.1%, Buddhist 0.3%, Ravidassia 0.6%, other 0.4%, no religion 23.6%, not stated 6.6%. There is a strong correlation between certain religions and race: for example, many Pakistanis and Bangladeshis are Moslems, while many Indians are Hindu or Sikh. 2011 information shows that the composition of religion by ward varies greatly, with differences largely tied to ethnicity. For example, 41% of Queens Park ward residents are Muslim (3,500), and there are also large Muslim populations in Cauldwell (970), Castle (870) and Kingsbrook (840) wards. Almost 5% of Kempston Town residents are Sikh, and there is a large Hindu community in Cauldwell (460). There is a notable difference in the proportion of the population who are Christian between the urban (56%) and rural (65%) areas of the Borough. Again, this largely reflects their different ethnic compositions, but is also influenced by the older age profile of the rural area.

The highest proportion of Christians is in Oakley (69%) ward, followed by Bromham & Biddenham and Putnoe (both 68%). The lowest is in Queens Park (37%).

Sex (gender)
The 2011 Census indicates that out of 158,000 residents, 80,200 are women.
There is no evidence that members of this group are concentrated in any particular area and it is assumed that they are randomly distributed.

Sexual orientation
The ONS Integrated Household Survey April 2010 – March 2011 indicates that out of approximately 490,000 adults 1.5% in the United Kingdom identified themselves as gay/lesbian or bisexual, 94% of adults identified themselves as heterosexual/straight and 0.5 per cent of the surveyed population, approximately 239,000 adults, identified themselves as Bisexual. There is no evidence that members of this group are concentrated
in any particular area and it is assumed that they are randomly distributed.

**Marriage & civil partnership (in relation to eliminating discrimination)**
The provisional number of civil partnerships in the UK in 2011 was 6,795, an increase of 6.4 per cent since 2010. There is no evidence that members of this group are concentrated in any particular area and it is assumed that they are randomly distributed.

**Other identified groups**
The highest ranked areas for deprivation in the Borough are all in the urban area. They are located within the following wards – Castle, Harpur, Cauldwell, Kingsbrook, Goldington and Kempston North. The wards with the highest levels of unemployment are all in the urban area. They are as follows – Castle, Cauldwell, Queens Park, Kingsbrook, Goldington, Harpur, Kempston North, Kempston West.

| What further research or data do you need to fill any gaps in your understanding of the potential or known effects of the activity? | None. |

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**General Equality Duty**

**Which parts of the general equality duty is the activity relevant to?**

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<thead>
<tr>
<th></th>
<th>Eliminate discrimination, harassment and victimisation</th>
<th>Advance equality of opportunity</th>
<th>Foster good relations</th>
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<tbody>
<tr>
<td>Age</td>
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<td>Most relevant.</td>
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<tr>
<td>Disability</td>
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<td>Most relevant.</td>
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<tr>
<td>Gender reassignment</td>
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<td>Most relevant.</td>
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<tr>
<td>Pregnancy and maternity</td>
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<tr>
<td>Race</td>
<td>Most relevant.</td>
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<tr>
<td>Religion or belief</td>
<td>Most relevant.</td>
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<tr>
<td>Sex</td>
<td>Most relevant.</td>
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<tr>
<td>Sexual orientation</td>
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<tr>
<td>Marriage &amp; civil partnership</td>
<td>Most relevant.</td>
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**Impact on equality groups**

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<th>Age</th>
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<th>Negative impact</th>
<th>No impact</th>
<th>Explanation</th>
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<td>✗</td>
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<td>The preferred development strategy focuses growth in the existing urban area of Bedford and Kempston, therefore it may be considered that in particular the on average younger population in the urban area may become affected by decreased environmental opportunity, including traffic, noise and reduced air quality as result of future development. The preferred development strategy also proposes growth in some larger rural settlements. The residents in the smaller rural settlements that are on average older may be adversely affected through increasing levels of deprivation in terms of access to essential services such as a GP, primary school, post office or supermarkets, as well as access to suitably specialised older persons housing, community facilities as well as other benefits that would result from growth. Similarly, little or no growth in rest of the borough may also result in reduced access to education provision, skills development, leisure and recreation facilities as well as employment opportunities for the younger age groups that are resident in the rural areas.</td>
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<td>Whilst borough wide the population is forecast to increase by 7% between 2014 and 2021, the number of people 65+ is forecast to increase by 16% and the number of people 85+ is forecast to increase by 32% over the same period. Between 2014 and</td>
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2037 the Borough’s population is forecast to rise by 21% with increases of 67% and 156% for the 65+ and 85+ age groups respectively. This identifies the need for affordable housing and suitably specialised accommodation for elderly people as an issue for the new local plan. Almost 16% of pensioners in the borough are income deprived. The local plan offers the opportunity to make specific allocations to cater for the needs of the elderly.

Given that on average the existing urban population is younger than the rural population it may be considered that the younger population could potentially become disproportionately affected by increased social and economic opportunity as result of significant future development in the urban area, including access to housing, jobs, services, community facilities. Where the preferred strategy involves growth in the rural areas that are home to a larger proportion of older people, age groups may be considered to be positively affected through greater access to essential services such as a GP, primary school, post office or supermarkets, and public transport.

In addition, 2% of children in the borough are raised in income deprived households and the significant rise in the number of births, which is likely to result in a rise in preschool and younger school age populations, may place pressure on existing education facilities. The local plan may positively affect younger age groups, including children suffering deprivation in terms of income, education and skills through facilitating the delivery of new development that is likely to make financial contributions to education provision and improve the local skills base. It is therefore considered that the local plan seeks to specifically cater for the needs of age groups and delivers practical benefits for elderly people and young people.

| Disability | | |

The Local Plan contains policies to secure a range of different house types, including mobility housing. The plan also seeks to minimise the need to travel by directing development to sustainable locations. Where little or no growth is proposed in the smaller settlements, disabled persons resident in the rural area may potentially experience reduced access to essential services such as a GP, primary school, post office or supermarkets and public transport. However, there is no evidence to suggest that disabled people are geographically concentrated in the rural area.
Facilitating the delivery of new development that is likely to require highway, transportation and public realm improvements, the plan strategy encourages continuity of movement, improved links between communities, access to and connectivity within places.

Evidence suggests that the prevalence of disability increases with age and that the rural population is on average older than the urban population. It could be considered that as a result of growth in the urban and some rural areas, disabled persons in these locations may potentially experience positive impacts from new development, including suitable housing, new employment opportunities and improved accessibility.

| Gender reassignment |   |   | ☑ |

Gender reassigned people are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the preferred development strategy adversely affects this protected equality group, other than through decreased environmental opportunity resulting from new development in growth locations and reduced access to housing, employment and services in locations with little or no growth in the same way than the rest of the population.

| Pregnancy and maternity | ☒ | ☒ | ✗ |

Mothers and mothers-to-be are primarily prevalent amongst the younger age groups that are concentrated in the urban area. In addition, BME women being accountable for the significant rise in the number of birth may indicate that there are higher proportions of mothers and mothers-to-be amongst the BME communities that are concentrated in the urban wards. As growth is proposed to be focussed firstly in the urban area, mothers and mothers-to-be may potentially be disproportionately affected by the environmental effects of new development, such as increased traffic and congestion, loss of open land, pollution, reduced air quality and noise from traffic and construction. Those mothers and mothers-to-be that are resident in locations with little or no growth may additionally experience increased deprivation in terms of access to essential every-day-services services, including childcare facilities and schools as well as have limited access to employment opportunities for those wishing to return to work.

It could be considered that as a result of growth in the urban and some rural areas,
<table>
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<th>Race and faith</th>
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The evidence suggests a strong correlation between faith groups and BME groups. The concentration of the faith groups and BME population in the urban area means that members of these protected equality groups may be in particular affected by decreased environmental opportunity as result of new development that is likely to focussed in the urban area, such as traffic and congestion, loss of open land, pollution, reduced air quality and noise, such as from traffic and construction. Those faith and BME groups that are resident in locations with little or no growth may additionally experience increased income, education and skills deprivation as well as reduced access to affordable and suitable housing, essential services and rural public transport.

BME and religious communities may be positively affected by growth in the existing urban area through increased social and economic opportunity, including community infrastructure that promotes the right to worship, express religious belief and enables people to come together, promote social integration and interaction between people of different ethnicities and faiths. In addition, the greater the level of growth and quantum of development, the greater the level of social and economic opportunity that may be potentially experienced by race and faith groups in terms of access to suitable housing, employment and income.

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<tr>
<th>Religion or belief</th>
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Men or women are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the preferred development strategy adversely affects this protected equality group, other than through decreased environmental opportunity resulting from new development in growth locations and reduced access to housing, employment and services in locations with little or no growth in the same way than the rest of the population.
| Sexual orientation |  |  | ✔ | Sexual orientation groups are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the preferred development strategy adversely affects this protected equality group, other than through decreased environmental opportunity resulting from new development in growth locations and reduced access to housing, employment and services in locations with little or no growth any differently from the rest of the population. |
| Marriage & civil partnership |  |  | ✔ | Marriage and civil partnership groups are not concentrated in any particular area and it is assumed that they are randomly distributed. There is no evidence that demonstrates that the preferred development strategy adversely affects this protected equality group, other than through decreased environmental opportunity resulting from new development in growth locations and reduced access to housing, employment and services in locations with little or no growth any differently from the rest of the population. |
| Other relevant groups |  | ✔ |  | Those suffering income, education and skills deprivation as well as health inequalities are primarily concentrated in Castle, Cauldwell, Queens Park, Kingsbrook, Goldington, Harpur, Kempston North and Kempston West, whilst two thirds of the rural population suffer deprivation in terms of access to essential services. In rural locations where little or no growth is proposed, rural deprivation may potentially worsen for those already deprived in terms of access to every-day services. Where growth is proposed in the urban area, those suffering income, education and skills deprivation as well as poor health and life expectancy may potentially be disproportionately affected by decreased environmental opportunity resulting from new development. Where the proposed development strategy concentrates growth in the urban area, those suffering deprivation are likely be positively affected by the economic strengthening of growth concentrations through greater access to affordable housing and employment opportunities. Town centre development especially has the potential to significantly enhance the economic strengths of the urban area and reduce unemployment and income deprivation in the urban area. In addition, new development is likely to encourage |
the provision of new health facilities that will benefit residents in the deprived wards, whose life expectancy is on average 9 years lower than in the rest of the borough. As a result of growth in the rural areas, improved accessibility to services may potentially benefit those suffering deprivation.

**Commissioned services**

<table>
<thead>
<tr>
<th>What equality measures will be included in Contracts to help meet the three aims of the general equality duty?</th>
<th>N/A</th>
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<tbody>
<tr>
<td>What steps will be taken throughout the commissioning cycle to meet the different needs of protected equality groups?</td>
<td>N/A</td>
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**Actions**

<table>
<thead>
<tr>
<th>Actions to lessen negative impact</th>
<th>What will be done?</th>
<th>By who?</th>
<th>By when?</th>
<th>What will be the outcome?</th>
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<tbody>
<tr>
<td></td>
<td>Adopt and implement policies in the draft local plan to minimise the negative effects associated with development in different locations.</td>
<td>Planning Policy Team</td>
<td>In accordance with the published timetable for the preparation of the local plan</td>
<td>Adopted development plan policies to guide the location and detail of new development.</td>
</tr>
<tr>
<td>Actions to increase positive impact</td>
<td>Where possible adopt and implement policies in the draft local plan to maximise the positive effects associated with development in different locations.</td>
<td>Planning Policy Team</td>
<td>In accordance with the published timetable for the preparation of the local plan</td>
<td>Adopted development plan policies to guide the location and detail of new development.</td>
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<tr>
<td>Actions to improve equality in procurement / commissioning</td>
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<tr>
<td>Other relevant actions</td>
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**Recommendation**

<table>
<thead>
<tr>
<th>No major change required</th>
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<tr>
<td>Adjustments required</td>
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<tr>
<td>Justification to continue the activity</td>
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<tr>
<td>Stop the activity</td>
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</table>

**Summary of analysis**

In preparing this report, due consideration has been given to the Borough Council’s statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.
The development strategy and policies contained within the local plan 2035 have been considered in relation to their potential impacts on protected equality groups identified in relevant legislation, including age, disability, race, gender, religion and belief, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnerships, and those experiencing deprivation. Potential impacts both positive and negative have been identified. Negative effects on equality groups relate primarily to the environmental impacts of development, such as reduced air quality, traffic and congestion or noise. These can be mitigated through the inclusion of appropriate policy criteria, where necessary, and proposals for mitigation are being developed as part of the sustainability appraisal of the local plan.

Seeking local views and input on a range of issues, the consultation itself has a wide range of potential positive effects on all equality groups and significantly contributes to social equality in promoting inclusiveness and views on matters such as community centres, open spaces, employment and training opportunities, and in particular affordable housing. The groups that are likely to particularly benefit are those concentrated in or near the urban area and locations for growth. These are age groups, race and religious groups, mothers and mothers-to-be groups and those suffering deprivation.

### Monitoring and review

**Monitoring and review**

Once adopted, the impact of the Local Plan 2035's policies will be monitored on a yearly basis through the Authority's Planning Monitoring Report.

**Review date**

A further EA will be produced if modifications are required to the plan as part of the formal examination process.