



Equality Impact Assessment

Bromsgrove District Plan

March 2014



Equality Impact Assessment: Bromsgrove District Plan

Contents

1. Introduction
2. Bromsgrove District Diversity Profile
3. Assessment of Bromsgrove District Plan Consultation Processes
4. Equality Impact Assessment of Bromsgrove District Plan Policies
5. Summary and Conclusions of Equality Impact Assessment

1. Introduction

- 1.1 Bromsgrove District Council is committed to providing equality of access in service provision and employment. We recognise that discrimination does not need to be intentional for unfair treatment or adverse impact to occur. Our approach to equality recognises that there is a range of different groups in our society who may have different needs and we need to ensure that our services are fairly and equitably provided to the whole community.
- 1.2 The purpose of carrying out an Equality Impact Assessment is to demonstrate that the Single Equality General Duty is satisfied when designing and delivering services and functions. It is not enough to go through this process simply being aware of the General Duty; the assessment has to demonstrate how the Duty has been taken into account.
- 1.3 The General Duty has three aims: it requires public bodies to have **due regard** to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
 - advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - foster good relations between people who share a protected characteristic and those who do not
- 1.4 Having **due regard** means consciously thinking about the three aims of the General Duty as part of the process of decision-making. This means that the consideration of equality issues must influence the decisions reached by public bodies including:
- how they act as employers
 - how they develop, evaluate and review policy
 - how they design, deliver and evaluate services
 - how they commission and procure from others
- 1.5 Having **due regard** to the need to advance equality of opportunity involves considering the need to:
- remove or minimise disadvantages suffered by people due to their protected characteristics;
 - take steps to meet the needs of people from protected groups where these are different from the needs of other people; and
 - encourage people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
- 1.6 Fostering good relations involves tackling prejudice and promoting understanding between people from different groups.

- 1.7 Complying with the General Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive actions provisions in order to provide a service in a way which is appropriate for a particular group.
- 1.8 The General Duty also explicitly recognises that disabled people's needs are different from those of non-disabled people. In considering the requirements to meet the needs of disabled people, public bodies should therefore take account of disabled people's disabilities. This might mean making reasonable adjustments for them or treating them better than other people.
- 1.9 Whilst there is not a statutory duty for the Council to undertake an Equality Impact Assessment on the Bromsgrove District Plan it is essential that a strategic document like the Bromsgrove District Plan fully complies with the Single Equality General Duty. It is considered that the best way to show conformity to the duty is to undertake an Equality Impact Assessment on the Bromsgrove District Plan.

1.10 The Bromsgrove District Plan

- 1.11 The purpose of the Bromsgrove District Plan (formerly known as the Core Strategy) is to set out the long-term vision for how Bromsgrove town, the villages and countryside will develop and change in the period up to 2030. The Plan will set out how this vision will be delivered through a strategy of promoting, distributing and delivering sustainable development and growth. The Bromsgrove District Plan (BDP) will be submitted to the Secretary of State on 12th March 2014, with the examination in public expected to be held in summer 2014.
- 1.12 The BDP is a key delivery vehicle for the district and countywide Sustainable Community Strategies. Together these documents aim to enhance wider social, economic and environmental well being in Bromsgrove District. 12 strategic objectives for the Bromsgrove District Plan have been developed from these themes as follows:

SO1 Regenerate the Town Centre to create a thriving and vibrant centre providing facilities to meet the needs of Bromsgrove residents

SO2 Focus new development in sustainable locations in the District such as on the edge of Bromsgrove Town in the first instance

SO3 Support the vitality and viability of local centres and villages across the District

SO4 Provide a range of housing types and tenures to meet the needs of the local population for example the special needs of the elderly and the provision of affordable housing

SO5 Provide support and encouragement for economic growth of existing and new businesses for example, in knowledge based industries and high tech manufacturing, whilst also supporting farming and rural diversification and investing in lifelong education and learning skills

SO6 Encourage more sustainable modes of travel and a modal shift in transport, for example encouraging walking and cycling and promoting a more integrated, sustainable and reliable public transport network across the District

SO7 Improve quality of life, sense of well-being, reduce fear of crime, promote community safety and enable active, healthy lifestyles for example by providing safe and accessible services and facilities to meet the needs of Bromsgrove's residents

SO8 Protect and enhance the unique character, quality and appearance of the historic and natural environment, biodiversity and green infrastructure throughout the District

SO 9 Safeguard and enhance the District's natural resources such as soil, water and air quality; minimise waste and increase recycling including re-use of land, buildings and building materials

SO10 Ensure the District is equipped to adapt to and mitigate the impacts of climate change, for example, by managing and reducing flood risk by ensuring water and energy efficiency and by encouraging new developments to be low or zero carbon

SO11 Promote high quality design of new developments and use of sustainable building materials and techniques

SO12 Foster local community pride, cohesion and involvement in plan making process

- 1.13 The policies of the BDP show how these objectives will be delivered and achieved.
- 1.14 The BDP has been prepared by the council in partnership and consultation with the community. Everyone within the community is expected to benefit however, there are particular customers of the planning function or service who are likely to be more affected than others. These groups include those who apply for planning permission (developers, individuals and businesses), statutory bodies, parish councils, local interest groups, voluntary groups and other service providers.
- 1.15 It is essential that the BDP and the associated consultation processes are assessed to determine whether unlawful discrimination has

occurred or is likely to in the future. This assessment will consider the BDP in relation to:

- Race
- Disability
- Age
- Gender
- Religion/ Belief
- Sexual Orientation
- Transgender

2. Bromsgrove District Diversity Profile

2.1 Race

2.2 Bromsgrove District has limited diversity in terms of ethnic origin compared to the region and the country as a whole. Census 2011 data indicates that 93.6% of district residents are White British. This is a similar figure to Worcester County (92.4%) but much higher than both the West Midlands (79.2%) and the whole of England (79.8%).

2.3 The next largest ethnic groups are Indian (1.2%), White Other (1.2%) and White Irish (1%) meaning that the remaining ethnic groups constitute 3% of the population. Of the remaining 3% of the population the largest ethnic groups are White and Black Caribbean (0.7%) and White and Asian (0.5%).

2.4 Whilst the level of diversity in term of ethnic origin is low it is clear that the level of diversity has increased over the past decade. At the time of 2001 census 95.7% of residents described themselves of White British.

2.5 The Worcestershire South Housing Market Area Gypsy and Traveller Accommodation Assessment (2008) identifies that there are 26 Gypsy and Traveller families in the district, and since this time the site is Wythall has been expanded to create a further 5 pitches. In comparison to Worcestershire County the number of Gypsy and Travellers living in the district is considered to be quite small.

2.6 Disability

2.7 Statistics from the 2011 census highlight that 17.5% of district residents consider they have a long-term health problem or disability, compared to 18.9% in the West Midlands and 17.64% in England. Data from the Department for Work and Pensions highlights that in recent years that there has been an increase in the number of people in the district claiming Disability Living Allowance with the total rising from 3020 in August 2006 to 3510 in August 2010.

2.8 Age

2.9 Using the ONS 2012 mid-year estimates the total population of Bromsgrove is 94,300. 17.5% of the population are aged 15 or under compared to 19.5% in the whole of the West Midlands. The population aged between 16-64 in Bromsgrove make up 61.3% of the total population, this compares with 63.1% in the West Midlands. Individuals aged over 65 years make up 21.2% of the total population in Bromsgrove compared to a West Midlands average of 17.4%. In all cases the figures show that the district has a much older population than the West Midlands average. When comparing to the national

average the disparity is even greater. For example only 16.9% of the country's population is aged over 65 in comparison to the figure of 21.2% in Bromsgrove District. The Worcestershire SHMA emphasises that migration patterns play an important role in the age profile of the district with there being a large net inflow in the 75+ age range and a net loss associated 15-19 year olds. A continuation of this trend will lead to further ageing of the population within Bromsgrove District.

2.10 Gender

2.11 The 2011 census identifies that 49.45% of the district's population are male and 50.55% female, this is broadly in line with national averages. A significantly higher proportion of men are economically active at 82.4%, compared to women at 71%.

2.12 Religion and Belief

2.13 In 2011 68.9% of people in Bromsgrove were Christian. This compares to 60.2% of people in the West Midlands and 59.4% in the whole of England. The proportion of people with religions other than Christianity were very low with 0.2% Buddhist, 0.3% Hindu, 0.5% Muslim, 0.7% Sikh and 0.3% other religions. 22% stated that they had no religion whilst a further 6.9% chose not to state their religion.

2.14 In comparison with 2001 census data there has been a modest increase in minority religions. In contrast there has been a fall in the number of Christians and the proportion of people who stated they had no religion has virtually doubled over this 10 year period.

2.15 Sexual Orientation

2.16 There is limited information relating to sexual orientation. In the 2001 Census it was recorded that 82 people in the district were living as part of a same sex couple.

2.17 Transgender

2.18 There is no information relating to transgender.

2.19 Summary

2.20 The population of Bromsgrove District is distinct and in many ways quite diverse. Unfortunately the level of information varies between different groups in society. It is now important to consider if previous consultations have engaged appropriately with the wide variety of people within the district and how BDP policies are likely to impact on the identified groups in society.

3. Assessment of Bromsgrove District Plan Consultation Process

- 3.1 The planning system requires that all sections of the community are involved in the various stages of the planning process, particularly plan making. The Statement of Community Involvement (SCI) is the statutory document (adopted September 2006) that sets out the District Council's policy for community involvement and consultation in the preparation of all planning documents and in making development control decisions on planning applications. The SCI sets out:
- Why involving the community is important;
 - What the community can be involved in;
 - How we will engage the community;
 - The various methods for involving people; and
 - How people will be informed of any outcomes
- 3.2 In preparing the Bromsgrove District Plan (BDP) the Council has undertaken a series of consultation activities to involve key stakeholders and the community in developing policies for the district. The main consultation stages have been:
- Issues and Options Consultation - 2005
 - Further Issues and Options Consultation – 2007
 - Draft Core Strategy Consultation – 2008
 - Redditch Growth Options Consultation -2010
 - Draft Core Strategy 2 Consultation – 2011
 - Housing Growth Consultation – 2013
 - Proposed Submission Version of the BDP - 2013
- 3.3 The BDP provides a development strategy for the whole of Bromsgrove District and will impact on everyone that lives and works in the district. In implementing the SCI the council considers it important that local people and organisations have the opportunity to directly influence decisions about the future of their area, and where appropriate help put those decisions into practice. The range of people and stakeholders involved in the preparation of the BDP is therefore diverse, and reflects the urban and rural nature of the district. They include:
- Statutory bodies (and special interest groups) including; adjacent local authorities, regional and national agencies
 - Voluntary bodies working within the district
 - Local businesses
 - Residents
 - Landowners, property and development interests and transport bodies
 - Bodies representing the wider community; including the Local Strategic Partnership and Parish Councils
- 3.4 The Council is committed to engaging with as many people as possible from a diverse range of backgrounds across all sectors of the local community. The SCI identifies the following hard to reach groups:
- Single parents

- Disabled People
- Carers
- Elderly
- Young People
- Black and Minority Ethnic Groups

- 3.5 The SCI goes on to state that in an attempt to remove barriers to involvement for these groups the Council will:
- Use a variety of involvement techniques to reach as many people as possible;
 - Reach rural communities through Parish Councils;
 - Hold events outside of normal working hours;
 - Contact specific representative groups for advice on encouraging involvement; and
 - Produce documents in different languages and formats

3.6 Engagement and Involvement

- 3.7 The SCI made a commitment to using different ways of communicating and different types events to involve the community in the emerging Plan and make the process as inclusive as possible. This section gives an indication of methods used and measures taken during consultation, particularly in relation to identified Equalities Groups (Race, Gender, Disability, Religion and Belief, Age, Sexual Orientation and Transgender).

3.8 Dissemination of Information

- 3.9 Written information has been prepared and made available at every consultation stage. At the Issues and Options stages questionnaires and leaflets (summary and topic based) were provided. At the Draft Core Strategy stages and Redditch Growth consultation stages summary leaflets and response forms were provided. All documentation has been made available in both hard copy and electronic forms, with the latter encouraged. Every effort was made to use plain English to encourage as many people as possible to take part in the consultation. A commitment to provide information in other formats e.g. large print, audio, braille and other languages on request, was explicit in all published information.
- 3.10 At all stages multiple ways of enabling people / groups to express views and submit responses were used, including; written, online and verbally at public events. This was undertaken to make engaging with and responding to the consultation as accessible as possible taking account of the potential needs of the different sections of the community as defined in the Equality Act 2010.

3.11 Consultation Events

3.12 A wide range of formal and informal activities and events have been used to engage with the community and particular parties, some reflecting the equality and diversity groups assessed in this report. The table below highlights the main event and activities held through each consultation period.

Consultation	Event Details	Attendees	Time and Date
Issues and Options (2005)	Event in Council Chamber to publicise LDF process	Local residents and community organisations	Afternoon and evening in March 2005
	Face to face focus groups on key issues such as housing, the environment and the economy held at the Council House	Representatives from various bodies including Citizen's Panel, Bromsgrove Action Group for Older People, Bromsgrove Access Group and Parish Councils	Various am and pm sessions on weekdays through July 2005
	Area meeting with Parish Councils and community groups at various locations across the district	Parish Councillors, Parish residents and community groups	Various daytime and evenings through summer 2005
Further Issues and Options (2007)	Town Hall event 'piggybacking' LSP annual meeting	LSP group members including Primary Care Trust, West Mercia Police and BDHT	Daytime event summer 2007
	'Piggybacking' of Street Theatre events at Town Centre Recreation Ground	Variety of local residents e.g. families, the elderly	Various daytime events through August 2007
Draft Core Strategy Spatial Vision (2008)	Town Hall event 'piggybacking' LSP annual meeting	LSP group members including Primary Care Trust, West Mercia Police and BDHT	July 2008
	'Piggybacking' of Street Theatre events at Town Centre Recreation Ground, Hagley, Wythall and Rubery	Variety of local residents e.g. families, the elderly etc	Various daytime events through August 2008
Draft Core Strategy (2008)	'Drop-in' event at Council House with presentations and opportunities to chat to officers	Residents and key stakeholders	Daytime and evening event January 2009

	<p>Presentations at Parish Meeting held at suitable locations within interested Parishes</p> <p>Meetings with individual infrastructure providers at Council House</p> <p>Presentation at LSP meeting held at Council House</p>	<p>Parish Councillors and Parish residents</p> <p>Primary Care Trust, utility companies, emergency services etc</p> <p>LSP group members including Primary Care Trust, West Mercia Police and BDHT</p>	<p>Evening meetings winter 2008/09</p> <p>Various daytime meetings winter 2008/09</p> <p>Daytime meeting during winter 2008/09</p>
<p>Redditch Growth Options Consultation (2010)</p>	<p>Consultation events held at Town Hall Redditch, Kingfisher Centre, Palace Theatre, Alvechurch Baptist Church and Bentley Village Hall</p> <p>Presentations to local groups including Redditch Community Forum and Alvechurch Parish Council</p> <p>Presentation at Bromsgrove Equality and Diversity Forum meeting held at Council House</p>	<p>Wide variety of Bromsgrove and Redditch residents</p> <p>Local residents and forum members including Redditch Disability Access Group, Caribbean Roots Connection and Age Concern</p> <p>Forum members include Bromsgrove Indian Community Forum, MENCAP, Bromsgrove Muslim Network and Mental Health Action</p>	<p>Daytime, evening and weekend events across February and March 2010</p> <p>Daytime and evening presentations Winter 2010</p> <p>Evening meeting April 2010</p>
<p>Draft Core Strategy 2 (2011)</p>	<p>'Drop-in' events held at Council House, Bromsgrove High Street and the Dolphin Centre providing opportunities to talk to officers</p> <p>'Drop-in' events held within Parishes (Wythall and Barnt Green) as requested by Parish Councils,</p>	<p>Wide variety of Bromsgrove Residents and stakeholders</p> <p>Local residents within Wythall and Barnt Green</p>	<p>Various daytime, evening and weekend events across February and March 2011</p> <p>Daytime and evening events in March 2011</p>
<p>Housing Growth Consultation (2013)</p>	<p>'Drop-in' events held at Bentley Village Hall, Foxlydiate Arms PH, Kingfisher Centre and Alvechurch Village Hall</p>	<p>Wide variety of Bromsgrove and Redditch residents and stakeholders</p>	<p>Various daytime, evening and weekend events across April</p>

			2013
Proposed Submission Version of the BDP (2013	Officers were available to help residents complete representation forms at Bromsgrove Council House and Redditch Town Hall	Small number of residents	All day Monday to Friday and Saturday mornings over a 6 week period in October and November 2014

3.13 Venues for events were carefully chosen so that they were already familiar to people and were fully accessible for disabled people. When consultations were undertaken on both the Draft Core Strategy and Draft Core Strategy 2 the Council contacted all Parish Councils in the district offering to attend Parish Council meeting or hold 'drop-in' events at an appropriate location within the Parish.

3.14 All events were widely publicised through the Council website, newspaper adverts and adverts within 'Together Bromsgrove' which is a free publication received by all residents in the District. For the Redditch Growth Consultation events flyers were hand delivered to residents in the settlements of Bordesley and Rowney Green and also those in the Parishes of Bentley/ Pauncefoot and Tutnall / Cobley. People who were unable to attend events were encouraged to use the Councils website and to contact the Strategic Planning Team for further information.

3.15 To aid participation key information was presented visually and verbally at all consultation events and sometimes facilitated group discussions were used to enable specific issues / questions, pertinent to particular locations or groups to be addressed. At all exhibitions and 'drop-in' events Planning Officers were always on hand to answer questions and offer practical help and support to participants when needed.

3.16 During the 6 week period of representations for the Proposed Submission Version of the BDP the Council made every effort to ensure the process of submitting representations was as straight forward as possible for residents. Officers were on hand throughout the period to help residents fill in the representation forms enabling them to articulate their points in the correct manner at this formal stage of the process.

3.17 Awareness Raising and Advertising

3.18 All stages, events and information concerning the emerging Plan have been promoted and advertised using a variety of methods to raise awareness amongst as many people as possible. These have included; press launch / articles, Council website, articles and notices of events in local newspapers and the Village Magazine and circulation through the Equality and Diversity Forum and the Disabled Users

Group to a wide range of community individuals and groups. In the case of the Housing Growth Consultation a new joint website was created to provide information and help to all interested parties. All relevant published documents were available for viewing at the Council House, Customer Service Centre and all public libraries in the district. Sufficient numbers of hard copies were available in these locations to enable interested people to take copies home and read at their leisure. This was particularly popular for those who did not have access to the internet. All documents were clearly labelled with the dedicated e-mail address and Officer telephone numbers to ensure that it was easy for participants to contact Officers during the working week. In addition written invitations were sent to all organisations / individuals on the Consultation Database to advise and encourage them to take part in consultations.

3.19 Feedback on Consultation

3.20 The importance of giving feedback to those engaged with the process has been acknowledged throughout and at key stages information has been published to identify, summarise and explain the feedback received. This has included:

- Consultation Statement (Sept 2013)
- Consultation Statement (Jan 2011)
- Consultation Report on Issues and Options (Oct 2008)

3.21 Details of all duly made comments on the Draft Core Strategy 2 can be found via the following link:

<http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/bromsgrove-district-plan/previous-consultations/draft-core-strategy-2.aspx>

3.22 The responses have been sorted into categories to make it easy for respondents to find the summarised version of their comments. Officers have responded to each individual comment and any proposed actions have also been highlighted.

3.23 Conclusions on Consultation Process

3.24 Across all of the consultation periods it is considered that the Council has engaged with or received responses from thousands of organisations/individuals. During the 2005 Issues and Options consultation approximately 180 people attending the focus groups and the event held in the Council Chamber and over 50 people responded via the questionnaire and a further 26 responses were received in the form of a letter or email. The 'piggybacking' of Street Theatre events during the Issues and Options consultation 2007 gave the Council the opportunity to engage with a number of residents and a total of 120 written responses were received. Approximately 50 people attended the 'drop-in' event for the Draft Core Strategy consultation (2008) and

127 written responses were received. The events held during the Redditch Growth consultation were attended by hundreds of people and 120 written responses were received. A total of approximately 1,000 people attended the wide range of 'drop-in' events held during the Draft Core Strategy 2 consultation and this resulted in a total of 2,248 responses plus two petitions. During the Housing Growth Consultation hundreds of people attended the 6 'drop-in events' and resulted in a total of 450 responses to this single issue consultation. During the 6 week representation period for the Proposed Submission Version of the BDP there were a 145 respondents making a total of 686 comments. It is acknowledged that that some people and organisations will have attended multiple events and responded more than once across the various consultation stages and therefore it is impossible to calculate the total number of different individuals and organisations that have been involved at some point in the process.

- 3.25 It is considered that overall the Council has invested heavily in attempting to involve all sectors of the resident population and those who work and visit the district. This has been achieved through a range of well publicised events that have been held at different dates and times in easily accessible locations across the district. A presentation at an Equality and Diversity Forum meeting is an example of a targeted effort to engage with equality groups in the district. The high level of responses received, particularly in relation to the Draft Core Strategy 2 highlights that the consultation methods have been successful and inclusive. Although the Council has not collected equalities data from all consultation responses meaning it is not clear if all sections of the community have actively participated.

4. Equality Impact Assessment of Bromsgrove District Plan Policies

- 4.1 This part of the report provides an overview of each individual policy of the Bromsgrove District Plan. It is set out in the form of a matrix and assesses whether each policy has the potential to have an impact on any of the identified equality groups.

Symbol	Likely Impact
+	Likely positive effect
0	Neutral / no effect
-	Likely negative effect
+/-	Uncertain effect

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
BDP1 Sustainable Development Principles - Sets out development principles to ensure that developments are sustainable and can integrate into the locality without undue harm.	0	+	+	0	0	0	0	The policy promotes development in locations where public transport is accessible. This will provide benefits for those who do not have access to a car due to issues of age or disability.
BDP2 Settlement Hierarchy - Sets out a hierarchy of settlements in the Bromsgrove District and defines suitable development appropriate by type of settlement	0	+	+	0	0	0	0	Focusing the majority of future development on Bromsgrove Town whilst enabling existing settlements that has a range of services and facilities to develop will particularly help those who live in rural areas, have restricted mobility or rely on public transport.
BDP3 Future Housing and Employment - Sets out development targets for housing and employment in Bromsgrove District up to 2030 and identifies the need for a Green Belt review for the	0	0	0	0	0	0	0	The policy sets out the levels of housing and employment growth proposed but does not provide any criteria to guide development. On this basis no impact on equality groups has been identified.

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
period beyond 2023.								
BDP4 Green Belt - a policy which seeks to protect the Green Belt in Bromsgrove District and sets out the type of development which would be appropriate and also sets out the framework for the Green Belt Review	+	+	+	0	0	0	0	<p>The policy highlights the forms of development that are appropriate in the Green Belt and this includes limited affordable housing.</p> <p>Rural exception housing provides an opportunity for local residents to stay within a particular settlement and is potentially most likely to benefit those at either end of the age spectrum who are least likely to be in a position to afford market housing.</p> <p>Providing a mix of house sizes can benefit particular age groups e.g. the provision of small flats may be affordable for young first time buyers whilst large dwellings may be appropriate for the cultural needs of Asian Minority Ethnic Groups.</p>
BDP5A Bromsgrove Town Expansion Sites Policy - The policy identifies the	0	+	+	0	0	0	0	The development of strategic sites around the town that include housing, an extra care facility, employment, community

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
large sites around Bromsgrove Town that will accommodate a significant proportion of growth and sets out guidance for the development of the sites.								<p>facilities and open space will deliver benefits for residents of the town and the occupiers of the proposed dwellings. An extra care facility will deliver benefits for elderly residents who require support and help with day to day activities. The provision of open space can be enjoyed by people of all ages particularly children and the elderly.</p> <p>The provision of a range of facilities within close proximity increases accessibility for all, particularly those who are young, the elderly and those who have mobility issues.</p>
BDP5B Other Development Sites Policy - The policy identifies the sites in large settlements that will contribute to the delivery of housing growth.	0	+	+	0	0	0	0	The development of other sites in sustainable locations in settlements across the district will help to maintain the vitality and viability of local services and facilities. Easy access to facilities is important for the young, elderly and those with mobility issues.
RCBD1 Redditch Cross Boundary	0	+	+	0	0	0	0	The development of strategic sites around Redditch Town that

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
<p>Development - The policy identifies the large sites north and west of Redditch Town that will accommodate 3,400 homes. The policy also sets out guidance for the development of the sites.</p>								<p>will include a wide range of facilities would deliver benefits for residents of the town and the occupiers of the proposed dwellings. The provision of open space can be enjoyed by people of all ages particularly children and the elderly.</p> <p>The provision of a range of facilities within close proximity increase accessibility for all, particularly those who are young, the elderly and those who have mobility issues.</p>
<p>BDP6 Infrastructure Contributions - Policy seeks to secure developer contributions towards different types of infrastructure provision.</p>	0	0	0	0	0	0	0	<p>All people who live, work and visit the district will benefit from the infrastructure that is secured to support new forms of development. It is unlikely to have any significant impact on any specific section of the community.</p>
<p>BDP7 Housing Mix and Density - Sets out the house sizes most needed in the District and the density requirements.</p>	+	+	+	0	0	0	0	<p>Whilst the policy does focus on delivering 2 and 3 bedroom homes the policy identifies that a wider mix of housing sizes and types will be required on large sites. Providing a mix of housing</p>

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
								<p>can benefit particular age groups e.g. the provision of small flats may be affordable for young first time buyers whilst large dwellings may be appropriate for the cultural needs of Asian Minority Ethnic Groups.</p> <p>The flexible approach to density could encourage extra care schemes or sheltered accommodation suitable for the elderly which are generally high density.</p>
<p>BDP8 Affordable Housing - Sets out the thresholds and targets for affordable housing provision</p>	+	+	+	0	0	0	0	<p>By implementing percentage thresholds for the provision of affordable housing the policy seeks to increase the supply of affordable homes across the district.</p> <p>The policy seeks to provide a mix of housing tenures, and to integrate affordable and market housing to create mixed and sustainable communities. The young and elderly tend to have a higher need for affordable housing. Provision suitable for</p>

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
								<p>the needs of older persons is explicitly referenced within the policy.</p> <p>Whilst the policy does focus on delivering smaller affordable homes the policy identifies that a different mix may be appropriate depending on local circumstances. Providing a mix of house sizes can benefit particular age groups e.g. the provision of small flats may be affordable for young first time buyers whilst large dwellings may be appropriate for the cultural needs of Asian Minority Ethnic Groups.</p>
<p>BDP9 Rural Exception Sites – Enables the provision of affordable housing schemes in rural areas within the Green Belt where a need has been identified.</p>	0	+	+	0	0	0	0	<p>Allowing rural exception sites will help maintain the vitality and viability of facilities and services within small settlements which have accessibility benefits for the young, elderly and those with mobility issues that live locally.</p> <p>Rural exception housing provides an opportunity for local residents to stay within a particular</p>

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
								settlement and is potentially most likely to benefit those at either end of the age spectrum who are least likely to be in a position to afford market housing.
BDP10 Homes for the Elderly - To provide adequate housing to meet the demographic trends of an ageing population	0	+	+	0	0	0	0	The policy is proactively addressing the housing needs of the elderly and those with mobility issues. The policy encourages all homes to be built to 'Lifetime Homes' standards so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.
BDP11 Accommodation for Gypsies, Travellers and Showpeople - Provides criteria based guidance for gypsy and traveller sites to ensure future sites are in appropriate locations.	+	0	0	0	0	0	0	The policy will help to provide living accommodation for this community. Requiring sites to be within, adjoining or in close proximity to existing settlement and within reasonable distance of local services: schools, shops, GP should help to reduce the exclusion often felt by this ethnic group.
BDP12 Sustainable	0	+	+	0	+	0	0	The policy seeks to retain

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
Communities - To provide sustainable communities that meet the needs of present and future residents in terms of service provision								existing community facilities and encourage new facilities where appropriate. The provision and retention of facilities has accessibility benefits for the young, elderly and those with mobility issues that live locally. The retention of religious buildings such as churches have an important role in the life of village communities.
BDP13 New Employment Development - Sets out the types of employment opportunities that will help to broaden the economic base of the District and strengthen the local economy.	0	+	+	0	0	0	0	New employment provision in Bromsgrove Town would be accessible via a range of transport modes which will help those who rely more on public transport (young, elderly) to access employment. Economic development in rural areas will assist in maintaining the vitality and viability of rural settlements which may improve accessibility for the local community, in particular the young, elderly and those with mobility issues.
BDP14 Designated Employment - The	0	+	+	0	0	0	0	Designated employment sites are located in sustainable

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
protection and promotion of existing employment uses								locations across the district. The protection of employment provision at designated sites will have accessibility benefits for the young and those with mobility issues that live locally and reduce the need for people to travel further to find employment.
BDP15 Rural Renaissance - To encourage the regeneration of rural areas	+	+	+	0	0	0	0	<p>The policy promotes a number of initiatives that will benefit rural communities. The encouragement for farm diversification, rural enterprises and live-work units will have accessibility benefits for the young and those with mobility issues that live locally.</p> <p>Rural exception housing provides an opportunity for local residents to stay within a particular settlement and is potentially most likely to benefit those at either end of the age spectrum who are least likely to be in a position to afford market housing.</p> <p>Providing a mix of house sizes can benefit particular age groups</p>

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
								e.g. the provision of small flats may be affordable for young first time buyers whilst large dwellings may be appropriate for the cultural needs of Asian Minority Ethnic Groups.
BDP16 Sustainable Transport - Policy seeks to ensure sustainable transport opportunities are maximised	0	+	+	0	0	0	0	The policy seeks to locate development in areas well served by local services to reduce the need to travel, where access to public transport and alternatives means of travel (foot / cycle) are convenient. Improvements to transport infrastructure will be sought via development enabling and mitigating measures co-ordinated for wider strategic benefit. The policy should result in a positive impact for those groups who rely more on public transport such as the young, elderly and disabled.
BDP17 Town Centre Regeneration - This policy seeks to set a framework for the regeneration of the Town Centre through a number of identified	0	+	+	0	0	0	0	Bromsgrove Town Centre is the most sustainable and accessible location in the district and is therefore the most logical location for new development. The concentration of new and improved facilities and services

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
sites.								<p>in this locality will be accessible to a greater proportion of residents, particularly the young, elderly and those with mobility issues. The policy also seeks to improve public transport links into the town meaning that facilities in the Town Centre will be accessible to a wider range of people.</p> <p>The policy also makes reference to the potential for housing in the Town Centre including accommodation that is suitable for the elderly. It also states that new proposals must contribute towards an accessible and attractive environment by ensuring accessibility for all and that proposals to improve the range of evening economy uses for all will be encouraged. This is likely to have benefits for all sectors of the population including the young, elderly and those with mobility issues.</p>
BDP18 Local	0	+	+	0	0	0	0	The protection of shops and

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
Centres – The policy seeks to protect identified local centres and maintain A class uses								other local services within local centres will ensure that such facilities are accessible to a greater proportion of residents, particularly the young, elderly and those with mobility issues.
BDP19 High Quality Design - A set of principles to safeguard the local distinctiveness of the District and ensure a high quality, safe and distinctive design throughout the development.	0	+	+	0	0	0	0	The policy makes specific reference to ensuring that developments are accessible to users and also ensures that residential developments provide sufficient space for everyday activities and enable flexibility and adaptability. This a clear benefit for the elderly and those with mobility issues.
BDP20 Managing the Historic Environment - This policy seeks to ensure the sensitive management of the Districts man-made historic assets and recognises the role of historic assets as a catalyst for regeneration.	0	0	0	0	0	0	0	The management and protection of historic assets should result in benefits for all who live, work and visit the district. It is unlikely to have a significant impact on any specific section of the community.

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
BDP21 Natural Environment - A set of principles to safeguard the local distinctiveness of the District and ensure the natural environment is managed in a better way	0	0	0	0	0	0	0	The management and protection of natural assets should result in benefits for all who live, work and visit the district. It is unlikely to have a significant impact on any specific section of the community.
BDP22 Climate Change - a set of principles to mitigate the causes of climate change from developments and ensure developments are able to adapt to the impacts of changing climate.	0	+	+	0	0	0	0	The policy ensures that developments are in locations that are well served by public transport. This will have accessibility benefits for the young, elderly and those with mobility issues.
BDP23 Water Management - a set of principles to ensure sustainability of the water environment and safeguard developments from the	+	+	+	0	0	0	0	Reducing flood risk should result in benefits for all who live, work and visit the district. In particular the policy will prevent vulnerable uses being located in areas of high flood risk. Vulnerable uses include care homes, nurseries, schools and caravans that are

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion or Belief	Sexual Orientation	Trans-gender	
risk of flooding								used for permanent residential use. The policy could therefore have direct benefits for the young, elderly, those with mobility issues and gypsies and travellers.
BDP24 Green Infrastructure - a set of principles to safeguard the delivery of a high quality multifunctional green space within and beyond the district boundaries	0	0	+	0	0	0	0	The green infrastructure network is a multi-functional asset which is important in enhancing quality of life for all people who live, work and visit the district. In particular it allows recreation space and playspace particularly for children, young people and the elderly and contributes to healthy lifestyles.
BDP25 Health and Well Being - To improve the quality of life and well-being of residents by promoting active, healthy lifestyles as well as improving access to health and leisure facilities.	0	+	+	0	0	0	0	The policy seeks to retain and enhance existing recreational amenity assets and improve access to such facilities by non-car modes of transport. Improved access will benefit the young, elderly and those with mobility issues.

5. Summary and Conclusions of Equality Impact Assessment

5.1 The assessment has examined whether the BDP policies and the consultation process used to develop it have had any adverse or beneficial impacts on or discriminated against any of the seven equality and diversity groups.

5.2 BDP Consultation Process

5.3 The assessment has shown that the Council has taken reasonable measures, to be as inclusive as possible and engage with the different sections of the community as defined in the Equality Act 2010, when consulting the public during the preparation of the BDP. For example, a range of events have been held across the various consultation periods at a variety of dates and times including weekdays, evenings and weekends. Logical and accessible locations have been chosen for events including Customer Service Centre and the High Street as well as asking all Parishes within the district whether they would like their own 'drop-in' event in their Parish. The Council has made efforts to specifically target equality groups; an example of this is a presentation to the Equality and Diversity Forum. All documents were written in plain English and summary documents were also provided where appropriate. All documents were made available online and in local libraries as well as being available in accessible formats and languages on request. The large numbers of responses received highlights that people felt involved and were aware of the consultations. Whilst the Council considers that efforts have been made to include all different sections of the community, the Council has not consistently collected and analysed equality data from all consultation responses meaning it is not clear if all sections of the community have actively participated. It may be appropriate for the Council to consider collecting equality monitoring data from all future consultations to fully gauge the impact of the consultation methods currently being used.

5.4 BDP Policies

5.5 The assessment has shown that the policies of the BDP will generally benefit all people who live, work and visit the district. The strategic nature of the BDP has a bearing on this overall outcome. Some policies are identified as having a neutral impact, whilst certain policies will have a positive impact for particular sections of the community as defined in the Equality Act 2010, specifically; race, age, disability and religion or belief. The community groups defined by age and disability would potentially benefit from policies which seek improvements to public transport, promote development in sustainable locations, the provision of affordable housing and housing suitable for the elderly. The policies setting out criteria for gypsy and traveller sites and providing a wide mix of house types (particularly large dwellings) would potentially have a positive impact on race. It has also been identified

that the protection of community facilities could lead to the retention of churches or other religious buildings which could have a positive impact on religious groups.

- 5.6 No specific impacts have been identified in relation the community groups defined by gender, sexual orientation or transgender primarily due to the strategic nature of the document.
- 5.7 Overall it is considered that no measures are felt to be required to mitigate the impact that any of the policies may have. However monitoring the implementation of the policies regularly, through the preparation of the Annual Monitoring Report (AMR) will be necessary to measure whether and how well they deliver on their aims and whether changes are required.
- 5.8 Equality and diversity is not traditionally a mainstream part of the planning specialism. The policy team recognise the need to continually improve knowledge and understanding in this area. The team will continue to liaise with the Equality Policy Officer, participate in training activities in support of the equality agenda, and undertake Impact Assessments to effect a gradual cultural change and further embed equality within the plan making process.

We will consider reasonable requests to provide this document in accessible formats such as **large print, Braille, Moon, audio CD or tape or on computer CD**

"Need help with English?" Contact Worcestershire HUB, Bromsgrove 01527 881288

'Potrzebujesz pomocy z angielskim?' Skontaktuj się z Worcestershire HUB, Bromsgrove, tel.: 01527 881288

"İngilizce için yardıma ihtiyacınız var mı?" 01527 881288 numarayı arayıp Worcestershire HUB, Bromsgrove ile irtibata geçin

"ইংরাজির জন্য সাহায্য চাই?" 01527 881288 নম্বরে উস্টাশায়ার হাব [HUB] ব্রমসগ্রভ [Bromsgrove]-এ টেলিফোন করুন

"ਅੰਗਰੇਜ਼ੀ ਵਿਚ ਮੱਦਦ ਚਾਹੁੰਦੇ ਹੋ?" ਵੁਰਸੈਸਟਰਸ਼ਾਇਰ ਹੱਬ [HUB] ਨੂੰ ਬਰੋਮਸਗਰੋ [Bromsgrove] ਵਿਖੇ 01527 881288 'ਤੇ ਟੈਲੀਫੋਨ ਕਰੋ

"انگریزی میں مدد چاہتے ہیں؟" ورسیسٹر شائر ہب [HUB]، برومزگرو [Bromsgrove] میں 01527 881288 پر رابطہ کریں



Bromsgrove
District Council

www.bromsgrove.gov.uk

● Planning and Regeneration

Strategic Planning

Bromsgrove District Council, The Council House

Burcot Lane, Bromsgrove, Worcestershire B60 1AA

Main Switchboard: (01527) 881288

Fax: (01527) 881313

DX: 17279 Bromsgrove

Email: strategicplanning@bromsgroveandredditch.gov.uk