



**CENTRAL BEDFORDSHIRE COUNCIL  
LOCAL PLAN**

**EQUALITY AND DIVERSITY IMPACT  
ASSESSMENT (EqIA)**

**SCREENING REPORT**

**June & Updated December 2017**



# EQUALITY AND DIVERSITY IMPACT ASSESSMENT (EqIA) SCREENING REPORT

## Central Bedfordshire Local Plan: Pre-Submission

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## 1.0 INTRODUCTION

- 1.1 This Report sets out the process and results of a screening assessment for an Equality and Diversity Impact Assessment (EqIA) of the emerging Central Bedfordshire Council Local Plan (CBLP)<sup>1</sup>. The CBLP sets out the spatial Vision, strategic Objectives, Spatial Strategy, strategic and development management Policies for planning and managing development in the Central Bedfordshire area for the period 2015 until 2035.
- 1.2 Enfusion Ltd, independent specialist sustainability and environmental assessors, has been commissioned to carry out the screening on behalf of Central Bedfordshire Council.

### Background

- 1.3 The Central Bedfordshire Council is preparing a Local Plan that will establish the strategic direction for the area, focusing on addressing the current and future needs of the area, including the amount and location of development requirements for housing, employment and supporting infrastructure for the period up to 2035. The Council is also considering possibilities for accommodating some of the development needs of adjacent local authorities, in particular Luton Borough Council to the south-east of the Central Bedfordshire area.
- 1.4 The emerging CBLP has been prepared to comply with national planning policy guidance using a range of evidence and taking into account responses made to previous consultations. It is based on collaborative research into the area's characteristics, relationships with adjoining areas, past trends, and future predictions. The draft Local Plan has had regard to the Health & Wellbeing Strategy (2012-2016)<sup>2</sup>, the Community Engagement Strategy (2013-2016)<sup>3</sup>, and the Central Bedfordshire Equality & Diversity Strategy (2013-2016)<sup>4</sup>.
- 1.5 Under the Equality Act 2010, public authorities such as Central Bedfordshire Council must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act
  - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic
  - Foster good relations between people who share a characteristic and those who do not share a characteristic
- 1.6 An EqIA is an assessment tool that seeks to improve the work of the Council and help ensure that it meets with the requirements of the Equality Act 2010.

<sup>1</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/overview.aspx>

<sup>2</sup> [http://www.centralbedfordshire.gov.uk/Images/health-wellbeing-strategy\\_tcm3-15510.pdf](http://www.centralbedfordshire.gov.uk/Images/health-wellbeing-strategy_tcm3-15510.pdf)

<sup>3</sup> <http://www.centralbedfordshire.gov.uk/council/stronger-communities/engagement.aspx>

<sup>4</sup> [http://www.centralbedfordshire.gov.uk/Images/equality-strategy\\_tcm3-3367.pdf](http://www.centralbedfordshire.gov.uk/Images/equality-strategy_tcm3-3367.pdf)

- 1.7 It is important to note that assessment of equality, diversity, and health/well-being (which is an important aspect of equality) has been detailed through the Sustainability Appraisal (SA) process<sup>5</sup>. All elements of the developing Draft CBLP have been appraised against an SA framework of objectives for sustainable development, including several SA objectives that directly and indirectly address equality, health and diversity: No.1 Housing, No. 2 Community Identity, No.4 Economy & Employment, No.5 Health and Equalities, and Nos. 6 & 7 Transport & Movement. The findings of this EqIA have been integrated into the SA of the Draft CBLP and are also provided as Appendix VIII to the Draft SA Report (June 2017) and the Pre-Submission SA Report (December 2017). Health and wellbeing effects are considered in detail in the SA Report.

### **Consultation**

- 1.8 The Initial EqIA Screening Report (June 2017) was included for consideration alongside the Draft SA Report and the Draft Regulation 18 CBLP for public consultation between 4 July and 29 August 2017. There were no comments received specifically on the EqIA Screening Report presented as Appendix VIII of the SA Report (June 2017).
- 1.9 Appendix IX of the Pre-Submission SA Report (December 2017) summarises the comments made on the Regulation 18 SA Report (June 2017). One comment related to the SA of the draft Plan Policies SP7 (now SP8) Gypsy, Traveller & Travelling Showpeople Pitch Requirement and H8 Assessing Planning applications for Gypsy & Traveller Sites. Concern was raised through the village focus groups concerning CBC's withdrawal of the preceding Gypsy & Traveller Local Plan (GTLP) and the limited details in the SA on sustainability of G&T/Showpeople housing. The SA response explained that any changes to the Plan Policies arising from further evidence and the Regulation 18 consultation comments will be subject to SA and reported in the Pre-Submission SA Report (December 2017). Any comments received on this updated EqIA Screening Report will be included with other comments on the SA and the draft Local Plan and submitted to the Secretary of State in March 2018 for independent examination later in 2018.

### **Purpose and Structure of Report**

- 1.10 The purpose of this Screening Report is to determine whether the Draft CBLP is likely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and whether a full EqIA is required.
- 1.11 This report is structured to demonstrate compliance with the requirements of the Equality Act. Following this introductory section, the Report is organised into three further sections:
- Section 2 - summarises the requirements of the Equality Act 2010 and the purpose of EqIA

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<sup>5</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- Section 3 - outlines the screening process and the findings of the screening assessment
- Section 4 - summarises the findings of the EqIA and sets out the next steps, including consultation arrangements

## 2.0 Equality and Diversity Impact Assessment: Equality Act 2010 Requirements

- 2.1 The Equality Act (2010) came into effect in October 2010 with the aim of harmonising all extant discrimination law and strengthening the laws that prevent discrimination. The Equality Act applies to the provision of services and public functions and includes the development of Council policies and plans. The Act maintains the protection provided by previous legislation and therefore prevents discrimination on the basis of nine protected characteristics (previously referred to as equality strands): age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 2.2 Inequality can exist in a number of forms with regard to land use and spatial development. This can include inadequate provision of, and access to, services (health, food stores, education & recreational facilities), good quality homes, employment opportunities, a healthy living environment and transport infrastructure (safe roads, pavements, public transport, cycle & footpaths) for all members of society.
- 2.3 In summary, public authorities must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.
  - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
  - Foster good relations between people who share a characteristic and those who do not share a characteristic.
- 2.4 The Equality Act 2010 does not specify how public authorities should analyse the effects of their existing or new policies in relation to equality, but doing so is an important part of complying with the general duty. The approach in this Report reflects the principles of the Equality Framework for Local Government<sup>6</sup> as applied across Central Bedfordshire, and other guidance provided by the Department of Health.
- 2.5 An EqIA is a tool that seeks to improve the work of the Council and ensure that the policies and plans developed do not discriminate in the way they provide services and employment, and that where possible they do all they can to advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not.
- 2.6 The methods and approach used for this assessment involve the following stages - outlined in the following Table 1. This EqIA Report sets out the method and findings for Stage 1 of the assessment - the Screening.

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<sup>6</sup> Equality and Human Rights Commission (2009) Equality Impact Assessment Guidance. Online at <http://www.equalityhumanrights.com/about-us/equality-and-diversity/our-assessments-of-impact/>

Table 1: Equality and Diversity Impact Assessment Key Stages	
<b>Stage 1</b>	
<b>Screening for Equality and Diversity Impact Assessment</b>	<ul style="list-style-type: none"> <li>■ Identify the main purpose and aims of strategy/plan.</li> <li>■ Identify other plans, programmes and assessments that have influenced the strategy/ plan in relation to equality.</li> <li>■ Provide baseline information on issues and needs related to each protected characteristic or person.</li> <li>■ Assess the impacts of the strategy/ plan on the protected characteristics or persons.</li> </ul>
	<ul style="list-style-type: none"> <li>■ <i>If no negative effects are likely then no further assessment will be required.</i></li> <li>■ <i>If there are effects are judged likely or uncertainty exists which cannot be easily mitigated – the precautionary principle applies, proceed to <b>Stage 2</b></i></li> </ul>
<b>Stage 2</b>	
<b>Full Equality and Diversity Impact Assessment</b>	<ul style="list-style-type: none"> <li>■ Complete additional baseline and research.</li> <li>■ Agree scope and method with wider [public] stakeholders as necessary.</li> <li>■ Assess strategy/plan in greater detail.</li> <li>■ Provide recommendations to mitigate negative impacts.</li> <li>■ Develop measures to monitor, evaluate and review (including timescale and mechanisms) the recommendations.</li> <li>■ Report outcomes of EqIA and consult with wider [public] stakeholders as necessary.</li> <li>■ Finalise EqIA following responses from public and implement.</li> </ul>



## 3.0 Equality and Diversity Impact Assessment Stage 1: Screening

### Approach to EqIA Screening: Key Tasks

- 3.1 As detailed previously in Table 1, the EqIA process typically involves two stages. This Report sets out our approach and findings for Stage 1 - to determine whether the Draft CBLP is likely to have any negative effects on protected characteristics or persons identified under the Equality Act 2010 and whether a full EqIA is required.
- 3.2 The process of EqIA Screening can be broken down into four main task areas as outlined in more detail below.

**Task 1: Identify the main purpose and aims of strategy/plan.** This is where a description of the strategy/ plan will be provided. The following questions will be used to set out the information required for this task. The questions are:

- What are the main aims, objectives, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?
- Who implements or delivers the policy, service or function?
- Who will be affected by the strategy/ plan?

**Task 2: Description of other plans, programmes and policies used to develop the strategy/plan.** This will draw out any relevant documents that have influenced the development of the strategy/ plan in relation to equality.

**Task 3: Review baseline data and research.** This will involve looking at relevant equalities monitoring data covering the nine protected characteristics or persons from existing databases. Any gaps will be identified.

**Task 4: Screening Assessment, recording the view and the supporting information and analysis.** This is where the information gained from tasks 1 to 3 is brought together to support the screening view.

The assessment uses a simplified version of the SA/SEA appraisal key<sup>7</sup> applied across the strategy/ plan, with the assessment informed by decision aiding questions:

- Will the policy have a negative impact on any of the protected characteristics or persons?
- How can identified negative impacts be minimised or removed?
- How can identified positive impacts be improved or enhanced?
- Is monitoring of the issues required?

Assessment Key	
+	Positive Effect/Compatible
-	Negative Effect/Not Compatible
0	Neutral Effect/Not Applicable
?	Unknown or Uncertain Effect

<sup>7</sup> See also SA Report (March 2017) accompanying the Draft CBLP on public consultation

## Task 1: Identify the main purpose and aims of the plan

### What are the main aims, objectives, purpose and outcomes of the Plan and how does it fit in with the wider aims of the organisation?

- 3.3 Many of the characteristics<sup>8</sup> of the area and the issues that are of concern are common throughout Central Bedfordshire and many are national issues, for example:
- An increasing & ageing population
  - Maintaining identity of settlements & communities; meeting diverse needs – Dunstable & Houghton Regis are more culturally diverse
  - Potential loss of Green Infrastructure & need to improve provision of areas of open space & recreation
  - Supporting a modal shift to more sustainable transport – cycling & walking
  - Protecting best & most versatile agricultural land
  - Improving biodiversity resource & ecological networks
  - High quality landscapes
  - Rich heritage assets
- 3.4 Other characteristics are more specific to the area, for example:
- Approximately 50% of residents commute to surrounding areas for work
  - Areas of higher deprivation in the south of area, particularly around boundary with Luton Town
  - Obesity in adults is higher than English average
  - Air quality associated with road traffic exceeds national objectives in Ampthill, Dunstable & Sandy
  - Increased pressures on regional water resources
  - Potential need to accommodate housing growth from outside the plan area
  - Much of west & south of the area is designated as Green Belt
- 3.5 The draft CBC Local Plan<sup>9</sup> sets out the preferred strategy for accommodating new development within Central Bedfordshire for the period up to 2035. The Local Plan sets out a vision for how the area will develop in the future and the purpose is to make sure that growth happens in a structured way to balance new development with protection and enhancement of communities and environmental assets. It includes a Vision and a number of Strategic Objectives, including those that address social inequality by providing homes and jobs for all and promoting for healthier communities. The Vision and the Strategic Objectives for the Draft CBLP are as follows:

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<sup>8</sup> Final SA Scoping Report (October 2016)

<sup>9</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/local-plan.aspx>

## Central Bedfordshire Local Plan Vision

*Central Bedfordshire has taken full advantage of its exceptional strategic position as the central hub of the Cambridge-Milton Keynes-Oxford Arc and its existing strategic north-south routes to deliver new high tech employment supported by sustainable new homes in a number of new village clusters in the Marston Vale and on the A1 corridor and town extensions to Luton and Arlesey which are well integrated into an enhanced high quality landscape. The heritage and distinctiveness of the existing market towns and villages has been preserved and enhanced by moderate growth ensuring a high quality environment for all residents. The new businesses and population are served by excellent community, transport and communications infrastructure and multi-service hubs have been delivered to support strong communities.*

## CBLP Strategic Objectives (SOs):

**SO1** Ensuring sustainable growth and associated infrastructure including the continued regeneration of town and neighbourhood centres to deliver the annual target for new homes and the provision of integrated health and care hubs.

**SO2** Delivering enough homes and jobs to meet our needs. Promote and demand good urban design practices throughout all types and scale of development across Central Bedfordshire.

**SO3** Conserve and enhance the area's heritage and settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage.

**SO4** Create high quality neighbourhoods that have regard for local character and use sustainability principles which are sensitive and responsive to the significance of the local environment, are distinctive, safe, functional and accessible and which reinforce the identity of the area's townscapes, landscape and public places.

**SO5** Provide a minimum of 24,000 new jobs by 2035, accommodating new economic growth along strategic and sustainable transportation routes, new mixed use developments and existing established sites.

**SO6** Recognise the contribution of land for employment uses to meet the needs of different sectors of the economy and manage the release of surplus employment land for other uses where appropriate.

**SO7** Link deprived areas with employment benefits arising from the development of major sites and existing key locations.

**SO8** Address housing needs in Central Bedfordshire using appropriate affordable housing targets and policies to encourage quality and choice.

**SO9** Reduce the reliance on the use of the car by improving facilities at bus and train stations, delivering transport interchanges and by promoting safe and sustainable forms of transport, such as improved walking and cycling routes.

**SO10** Ensure a reliable network of east/west and north/south public transport routes to improve access to local services and facilities, especially for those without a car, through well planned routes and integrated public transport. Encouraging the shift from road to rail freight to reduce demands on the highway network.

**SO11** Promote healthier and more active lifestyles by improving the quality of, and accessibility to, the area's open spaces, as areas for sports, recreation, visual interest, biodiversity, education, health and well being.

**SO12** Encourage the development of wildlife corridors and networks and provide new open spaces in line with the requirements identified in Central Bedfordshire's Leisure Strategy.

**SO13** Support the necessary changes to adapt to climate change by minimising emissions of carbon and local air quality pollutants, protecting and enhancing biodiversity. Improving and protecting air and water quality, reducing flood risk and adverse impacts from noise including the safeguarding of quiet areas and reducing the impacts of contaminated land.

- 3.6 The draft CBLP (June 2017) is based on research, technical studies and consultation<sup>10</sup> (communities and other key stakeholders) into the Council area's characteristics, relationships with adjoining areas, past trends and future predictions. The most recent research on the development need<sup>11</sup> has informed the need for new homes and new jobs over the period 2015 to 2035. New growth of a minimum of 24,000 new homes (around 23,000 homes are existing commitments) and a minimum of 24,000 new jobs has been selected as an appropriate response for the Draft CBLP to address and progress as a preferred strategy for development.
- 3.7 The draft Spatial Strategy sets out the preferred approach for distributing new development through a mix of focusing on existing urban areas and transport corridors. It included a number of preferred Growth Locations that are broad areas for strategic level development. The potential site options and preferred site allocations for development were investigated at the next stage of plan-making, the Pre-Submission Plan (January 2018), and will be subject to public consultation between 11 January and 22 February 2018.
- 3.8 The draft CBLP included policies that set out the strategic approaches and broad locational areas for development. It also included development management policies that set out the requirements and will guide new development to ensure that the Vision and Strategic Objectives of the Local Plan are met. A list of the policies (June 2017) is provided below:

### Strategic Policies

**Growth Strategy**  
**Gypsy & Traveller Requirement**  
**Development in the Green Belt**  
**Settlement Envelopes & Hierarchy**  
**Neighbourhood Planning**

<sup>10</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/shaping-central-beds-consultation.aspx>

<sup>11</sup> Central Bedfordshire and Luton Strategic Housing Market Assessment 2015 to 2035 (April 2017)

## **Development Management (DM) Policies: Infrastructure, Communications & Transport**

- Provision for Social & Community Infrastructure
- Indoor Sport & Leisure Facilities
- Strategic Transport Improvements
- Mitigation of Transport Impacts on the Network
- Highway Safety & Design
- Connectivity & Accessibility
- Development close to Public Transport Interchanges
- Low Emission Vehicles
- Management of Freight
- Parking

## **DM Policies: Housing**

- Housing Mix
- Housing Standards
- Supporting Older People
- Affordable Housing
- Rural Exception Sites
- Starter Homes
- Self & Custom Build Housing

## **DM Policies: Employment**

- Employment Sites & Uses
- Change of Use to Non Employment Uses
- Employment Proposals outside Settlement Envelopes
- Rural Economy & Tourism
- Significant Facilities in the Countryside & Green Belt

## **DM Policies: Town Centres**

- Town Centre Uses
- Retail for Minor Service Centres, Villages & the Rural Area
- Town Centre Development
- Fast Food Takeaways

## **DM Policies: Environmental Enhancement**

- Green Infrastructure
- Enhancing Ecological Networks
- Nature Conservation
- Trees, Woodlands, & Hedgerows
- Landscape Character & Value
- Tranquillity
- Chilterns AONB
- Greensand Ridge NIA
- The Forest of Marston Vale
- Bedford & MK Waterway Park
- Public Rights of Way
- Outdoor Sport, Leisure & Open Space
- Local Green Space
- Climate Change & Sustainability

**Renewable Energy Development**  
**Flood Risk Management**  
**Development close to Watercourses**  
**Sustainable Drainage**  
**Water Quality**  
**Pollution**  
**Applications for Minerals & Waste Development**

#### **DM Policies: High Quality Places**

**Successful & Sustainable Places**  
**Backland Development**  
**Larger Windfall Sites**  
**Small Open Spaces**

#### **DM Policies: The Historic Environment**

**Archaeology**  
**Historic Parks & Gardens**  
**Built Heritage**

#### **DM Policies: Development in the Countryside**

**New Dwellings in the Countryside**  
**Re-Use & Replacement of Buildings in the Countryside**  
**Redundant Sites within the Countryside**  
**Rural Workers Dwellings**  
**Equestrian & Livestock Related Development**  
**Agricultural Land**

#### **Who implements or delivers the policy, service or function?**

- 3.9 Central Bedfordshire Council is responsible for implementing the CBLP, when finalised and adopted – currently scheduled for 2018. The Draft CBLP will be subject to consultation with statutory and public stakeholders who can influence the Policies in the developing CBLP. Comments received from consultations will be taken into account in the next stage of the plan-making.

#### **Who will be affected by the plan?**

- 3.10 The Draft CBLP applies to the administrative area of Central Bedfordshire Council. It will affect everyone who lives, works in and visits the area. The CBLP may also affect those in the adjoining administrative areas, particularly for Luton Borough Council.

## Task 2: Description of other plans, programmes and assessments used to develop the plan

- 3.11 Appendix I provides a summary of other relevant plans, policies and assessments that have influenced the drafting of the CBLP in relation to equality and health. They include:

<b>Table 2: Key Plans, Programmes &amp; Policies used to develop the Draft CBLP</b>
<b>National</b>
National Planning Policy Framework (NPPF) (2012)
DCLG, Planning Policy for Traveller Sites (2015)
National Infrastructure Delivery Plan (2016-2021)
Public Health England, Global Health Strategy (2014-2019)
<b>Regional &amp; Central Bedfordshire Area</b>
Central Bedfordshire Health & Wellbeing Strategy 2012-2016 (refreshed April 2015)
Central Bedfordshire Community Engagement Strategy (2013-2016)
Central Bedfordshire Sustainable Communities Strategy (2010-2031)
Central Bedfordshire Local Transport Plan 3 (2011-2016) & Local Area Transport Plans (2011-2026)
Central Bedfordshire Housing Strategy (2012-2016)
Bedfordshire and Luton Strategic Green Infrastructure Plan (2007)
Greensand Trust, Mid-Bedfordshire Green Infrastructure Plan (2008)
Central Bedfordshire Environmental Framework (2016-)
Central Bedfordshire Rent Strategy (2014/15)
Central Bedfordshire Leisure Strategy (2014-2019)
Neighbourhood Plans
<b>Surrounding Area Development Plans</b>
North Hertfordshire District Council Draft Local Plan (2011-2031)
Luton Borough Council, Luton Local Plan (2011-2031)
South Cambridgeshire District Council Local Plan
Bedford Borough Council Local Plan Draft Local Plan
Milton Keynes Council Plan
Dacorum Borough Council Local Plan
St Albans City and District Council Strategic Local Plan (2011-2031)
Mayor of London, The London Plan (2015)
Vale of Aylesbury Local Plan
<b>Assessments</b>
SA/SEAs of emerging & adopted Local Plans

## Task 3: Review baseline data and research

- 3.12 The baseline information was sourced from Central Bedfordshire Equality and Diversity Strategy (2013-2016) which is available online at: <http://www.centralbedfordshire.gov.uk/council/equality/diversity.aspx> and the baseline information identified for the health and well-being topics as part of the SA/SEA Scoping process (Final Report, October 2016) and available



online at: <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/tech-supporting-studies.aspx>.

- 3.13 Given that these statistics have been collated to cover the nine protected characteristics or persons based on the most up-to-date information available under the Equality Act 2010, there are not considered to be any gaps in the data.
- 3.14 The equality and diversity trends in the Central Bedfordshire area from the Central Bedfordshire Equality & Diversity Strategy (2013) may be summarised as follows:
- **Age:** In 2011, 49,800 people in Central Bedfordshire were aged between 0 and 15. A further 164,700 were aged 16-64, with 39,800 aged 65 and over, this figure includes 17,900 people aged 85 and over. The number of people aged 65 and over is expected to increase by about 50% between 2008 and 2021.
  - **Marriage and civil partnerships:** In 2011 52.5% of the Central Bedfordshire population were married and 0.1% had entered into a civil partnership. 29.2% of the population were single, 11.9% were separated/divorced and 6.3% were widowed.
  - **Pregnancy and maternity:** The health and wellbeing of women before, during and after pregnancy is an important factor in giving children a healthy start in life and laying the groundwork for good health and wellbeing in later life. In Central Bedfordshire 90% of pregnant women accessed antenatal services before thirteen weeks of pregnancy. Although teenage pregnancies remain in line with the national average, they are higher than statistical neighbours. Children and young people who are already disadvantaged have an increased risk of teenage pregnancy.
  - **Race:** Central Bedfordshire is ethnically diverse with around 10.3% of people living in the area from black or ethnic minority communities. The biggest ethnic minority groups in Central Bedfordshire were White Other (not White British, White Irish or Gypsy or Irish Traveller), White Irish and Indian. Black Africans account for 0.8% of the population and 0.6% of the population are Chinese. Gypsies and Travellers account for 0.2% of the population which is slightly above the England and Wales average of 0.1%. People of mixed ethnicity make up around 1.9% of residents. The increasing amount of data on migrant workers, unaccompanied asylum seekers and other young people from non-UK backgrounds predicts that immigration in the region will increase.
  - **Religion or belief:** Most of the population state their religion as Christian (62.2%), with (28.4%) having no religion and other religions constituting (2.6%) of the population (Note: 6.8% did not state their religion).



- **Gender reassignment:** The 2011 Census did not include a specific question in respect of gender reassignment. It is estimated from national research that 1 in 10,000 people experience the recognised medical condition known as gender dysphoria, generally referred to as being transgender or transsexual. In any school of 1,000 pupils there are likely to be 6 who will have transgender experience at some point in their lives.
- **Sexual Orientation:** The 2011 Census did not include a specific question in respect of sexual orientation. It is estimated that 'out' gay people living in the United Kingdom form between 6% -10% of the population. This means that in Central Bedfordshire approximately 20, 000 people are likely to openly be lesbian, gay or bisexual, with others feeling unable to disclose such information because they fear the reactions of people around them. The figure for civil partnerships in Central Bedfordshire was 300 in 2011.
- **Sex:** The sex ratios of the Central Bedfordshire population vary according to age. In the younger age groups (ages 0-17) boys represent 51% of the population and girls 49%. In the working age adult groups (ages 18 -64) this ratio reverses with women representing 51% of the population and men 49%. At ages 65+ this trend increases with women representing 54% of the population and men 46%.
- **Disability:** Using the widest definition there are more than 11 million disabled people in the UK, that's more than one in five of the adult population and one in 20 children. 80% of people experience a year of being disabled at some point in their lives and 66% of disabled people develop impairments during working age. The majority of disabled people have impairments that are not easily visible. In the 2011 census findings 15,465 (6.10%) residents in Central Bedfordshire indicated that day-to-day activities were limited a lot and 21,142 (8.30%) residents indicated that day-to-day activities were limited a little.

#### **Task 4: Screening Assessment, recording the view and the supporting information and analysis**

- 3.15 The development of the draft CBLP has been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010.
- 3.16 The Vision, Strategic Objectives, Spatial Strategy and Development Management Policies have been assessed to the same level of detail, taking into account the information gathered in Task 3 to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The screening assessment is presented in Appendix II of this report with summary findings set out as follows:

## **Vision**

- 3.17 The Vision is considered to lead to positive effects on all protected characteristics by promoting a balanced growth policy that supports new development across the Central Bedfordshire area and thus should benefit all through provision of new housing, employment and associated supporting infrastructure, services and facilities.

## **Strategic Objectives**

- 3.18 Most of the Strategic Objectives will have a positive effect on all protected characteristics by guiding development to where it is most needed and in accordance with sustainable development principles. Certain Strategic Objectives will have strongly positive effects, as follows:
- SO1 seeks to ensure sustainable growth, including the continued regeneration of town and neighbourhood centres through the provision of integrated health and care hubs
  - SO7 seeks to link deprived areas with employment benefits arising from major development sites and existing key locations
  - SO8 addresses housing needs including affordable homes and to encourage quality and choice
  - SO9 & 10 encourage public transport, including safe and improved walking and cycling routes
  - SO11 promotes healthier and more active lifestyles
  - SO13 addresses pollution and risks from climate change effects

## **Spatial Strategy & Preferred Growth Locations (June 2017)**

- 3.19 The Spatial Strategy has been developed to increase the availability of housing and increase employment opportunities mainly in existing urban areas and with some provision for the rural areas. This should benefit all protected groups. The inclusion of a specific Strategic Policy for Gypsy, Travellers, and Travelling Showpeople in the Spatial Strategy will have major positive effects in respect of this ethnic group and the associated race protected characteristics.

## **Growth Strategy & Strategic Policies (December 2017)**

- 3.20 The Growth Strategy presented in the Pre-Submission Draft Plan has developed taking into consideration comments received from the public consultation in summer 2017. Policy SP1 states that 39,350 homes, and a minimum of 24,000 new jobs will be delivered in Central Bedfordshire over the period 2015 to 2035. This number includes around 23,845 homes which are already planned for or built. In order to accommodate the growth required up to 2035 in a sustainable and controlled manner, growth will be distributed throughout Central Bedfordshire, including on land currently designated as Green Belt.
- 3.21 Strategic Policies SA1-4 and SE1-4 provide guidance and set out requirements for strategic level housing and employment development respectively. Policy HA1 Small and Medium Allocations sets out how development will also be

brought forward through Neighbourhood Plans, and through small and medium scale extensions to villages and towns throughout Central Bedfordshire – again with positive effects for all groups through an inclusive approach and facilitating development throughout the Council's area.

- 3.22 Strategic Policy SP8 Gypsy and Traveller, and Travelling Showpeople Pitch Requirement sets out the identified accommodation need for these people: up to 71 pitches for Gypsy & Travellers; up to 31 plots for Travelling Showpeople. Assessing planning applications will be determined against Policy H8 (for Gypsy & Traveller sites) and Policy H9 (for Travelling showpeople sites) and other relevant policies in the Plan.
- 3.23 In preparing these Policies for Gypsies, Travellers, & Travelling Showpeople, the Council has taken into account the revised planning definitions<sup>12</sup> as well as its duties under the Equality Act (2010). In particular there may be travellers who no longer travel, and therefore no longer fall under the planning definition, but for whom the Council may still need to provide culturally suitable housing under the requirements of the Equality Act. Therefore, these policies do apply to all Gypsies, Travellers, and Travelling Showpeople and thus confirm positive effects for those Gypsies and Travellers protected as racial groups under the Equality Act.
- 3.24 Specific considerations in Policies H8 & H9 include access to health and educational services, local environmental quality, safety, and integrated co-existence between a site and the local community. This should help ensure that there is no discrimination and that equality of opportunity is promoted.

### **Development Management Policies (June & Updated December 2017)**

- 3.25 These Policies seek to ensure that all people (including protected groups) in the Central Bedfordshire area will have a high quality environment in which to live, work, and socialise. The Policies on Housing H1-H9 address the need for new housing development to be of a mix of tenures that should ensure all groups are served with the aim of inclusive, mixed communities. Particular focus has been given to adaptable homes in sustainable locations for older people (Policy H3) as this has been identified as a key issue for the area. Affordable housing (Policy H4) is required to be integrated with the market housing to promote community cohesion and tenure blindness with positive effects for all protected groups.
- 3.26 Policy H2 Housing Standards now provides specific targets for the percentage of Category 2 adaptable (35% of all new development), and Category 3 wheelchair accessible (5% of all new development) homes – thus confirming that there is no discrimination and no likely negative impacts for the relevant protected groups. Policies H6 Starter Homes and H7 Self & Custom Build Housing provide guidance for these particular needs, promoting further equality of opportunity with positive effects for protected groups. The impacts of Policies H8 & H9 on Gypsies, Travellers & Travelling Showpeople are

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<sup>12</sup> Planning Policy for Traveller Sites (2015)

considered later in the section on site allocations; positive impacts are indicated through such policies that reflect the particular characteristics and needs of these groups.

- 3.27 Employment and Economy Policies EMP1-5 provide new and protect existing employment land; range, flexibility and opportunities for change should support all protected groups. Provision of good quality, adaptable and affordable housing and employment will also have positive effects for health and well-being. Supporting Infrastructure Policies include requirements for an integrated approach to delivery of new social and community facilities and services with likely positive effects on all groups.
- 3.28 The Transport Policies require that walking, cycling and public transport should be addressed before any consideration of new roads; Policy T1 requires a reduction in the need to travel and a modal shift to sustainable transport. Policy T2 on Highway Safety includes the specific requirement to consider the access needs of all people with strong positive effects for all protected groups. Policy T4 Public Transport Interchanges requires development sites to ensure accessibility by realistic alternatives to the car. Overall, the approach to encourage more sustainable transport should have positive effects on health and well-being, including for all groups.
- 3.29 These Policies on housing, employment and infrastructure are likely to have the greatest positive effects for all groups. Policies relating to high quality places provide further details, for example, Policy HQ1 on High Quality Development requires safe and convenient access, no unacceptable adverse impacts on amenity, privacy, noise or air quality. Policy HQ4 Indoor Sport & Leisure Facilities protects these from redevelopment and provides guidance for new development – such provision promotes positive effects for all groups for health and well-being. Policy HQ7 Public Art requires public art appropriate to the scale of development and such provision will have positive impacts for cultural well-being.
- 3.30 Other Policies are also likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups. Of particular importance is Policy EE1 on Green Infrastructure (GI) that recognises the multifunctionality, requiring a high quality and net gain in GI with positive effects for all groups. Also important are the Policies that protect and enhance open spaces, parks and public rights of way with positive effects for all groups with regard to health and well-being. Policies on flood risk management and pollution are also likely to protect all groups. Policies on landscape and the historic environment will contribute to cultural and spiritual well-being with positive effects for all protected groups.

### **Site Allocations (December 2017)**

- 3.31 The Initial EqIA Report (June 2017) considered the Regulation 18 Draft CBLP that includes the proposed Vision, Strategic Objectives, Spatial Strategy and Policies with Growth Locations, and Development Management Policies.

Comments received through the public consultation in the summer of 2017 were taken into account in developing the next stage Regulation 19 Pre-Submission CBLP (January 2018) and this includes proposed development allocations – strategic and small/medium sites.

- 3.32 All reasonable options for site allocations were subject to SA/SEA which includes objectives and criteria on meeting the needs of all residents and communities, improving health and wellbeing, and reducing inequalities. The proposed site allocations will be subject to the requirements of the Policies considered in the Initial EqlA screening report and therefore are considered to all lead to positive effects on the protected characteristics.
- 3.33 A new strategic Policy SP3 Generic Requirements for Strategic Sites is presented in the Pre-Submission Plan (January 2018), and includes requirements to meet the housing needs of all sectors of the community, provide sustainable transport, green infrastructure, and Integrated Health and Care Hubs. These requirements should secure further positive effects for all groups and promote health/well-being and equality. Particular positive impacts are indicated through the Integrated Health and Care Hubs that are locality based and important to help meet the complex needs of an ageing and growing population with equitable and timely access to care. Provision of accessible sustainable transport and green infrastructure will encourage healthy lifestyles.
- 3.34 Strategic Policies SA1-4 set out particular strategic site-specific requirements that are likely to secure further positive effects for all groups. These include requirements for a mix of homes, community, leisure and health facilities, dedicated safe pedestrian and cycle links, noise attenuation, and green infrastructure. Strategic Policies SE1-4 set out strategic employment allocations which should secure positive effects for all groups through provision of local jobs.

### **Monitoring**

- 3.35 The Council is required to prepare a Monitoring Report that includes consideration of equality, health and diversity. The Central Bedfordshire Local Plan includes a separate monitoring framework setting out key indicators and contingencies that are critical to ensure the successful delivery of the Plan (Appendix 3, Pre-Submission Plan, January 2018). These indicators and contingencies are attached to the strategic objectives and policy targets of the Plan and directly and indirectly relate to equality, health and diversity. It will also be reviewed on an annual basis. Therefore, further monitoring regarding equality is not considered to be required.

## 4.0 Summary and Conclusions

- 4.1 The Pre-Submission Central Bedfordshire Local Plan (January 2018) details the Council's approach to delivering and accommodating new development within the Central Bedfordshire area for the period 2015-2035.
- 4.2 The development of the draft Central Bedfordshire Local Plan has been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010. This includes the SA process that has tested all the emerging elements of the draft CBLP against a framework of SA Objectives – No 5 specifically relates to equality & health. Furthermore, the draft CBLP includes Strategic Objectives that will strongly promote positive effects for all protected characteristics.
- 4.3 The Vision, Strategic Objectives and Policies, Development Management (DM) Policies, and Site Allocations have been assessed to the same level of detail, taking into account the baseline information gathered to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The assessment found that nearly all the components of the draft plan will lead to positive effects on the protected characteristics; two Development Management Policies were found to be not relevant to the protected groups with neutral effects. No negative effects were identified.
- 4.4 A number of reports are already produced on an annual basis which include consideration of equality, health and diversity within the Central Bedfordshire area. The Draft CBLP includes a further monitoring framework that addresses equality, health and diversity through assessing the delivery of the CBLP against its' Strategic Objectives and policy targets. Therefore, further monitoring regarding equality and diversity is not considered to be required.
- 4.5 An Initial EqIA Screening Report as part of the Initial SA Report (June 2017) accompanied the Draft Local Plan at Regulation 18 public consultation during the summer 2017. No comments were received specifically on the EqIA but some concern was recorded by the village focus groups regarding the sustainability of the policy approach to gypsies, travellers and travelling showpeople. The relevant Policies SP8, H8-9 reflect the identified need for pitches for gypsies/travellers and plots for travelling showpeople. This overall need for new pitches is limited and arises predominantly from family groups on existing sites such that these needs will be met via a combination of windfall applications and limited extensions to existing sites – thus ensuring that these racial protected groups are not discriminated and that there is equality of opportunity.
- 4.6 The assessment has found that the Draft Central Bedfordshire Local Plan is unlikely to have any negative effects on protected characteristics or persons identified under the Equality Act 2010 and thus a full EqIA will not be required.
- 4.7 These EqIA findings will be subject to consultation comments from wider stakeholders alongside the SA Report (December 2017) and the Pre-

Submission Central Bedfordshire Local Plan Regulation 19 public consultation between 11 January and 22 February 2018. Any comments received will be provided alongside the Submission Plan to be submitted to the Secretary of State in March 2018 for independent examination later in 2018.

## Appendix I: Central Bedfordshire Equality and Diversity Impact Assessment - Plans, Programmes and Assessments

Plan/Policy/Programme	Summary and Objectives
National Planning Policy Framework (NPPF) (2012)	<p>The national planning policy framework aims to reform the planning system to make it less complex and more accessible, and to promote sustainable growth. The NPPF streamlines existing Planning Policy Statements, Planning Policy Guidance Notes and circulars to form a single consolidated document which promotes sustainable development. It provides a framework within which local people and authorities can produce local and neighbourhood plans. Local Plans should set out strategic priorities to deliver:</p> <ul style="list-style-type: none"> <li>▪ To deliver a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);</li> <li>▪ Consider the needs of people with disabilities by all modes of transport.</li> </ul>
DCLG, Planning Policy for Traveller Sites, 2015	<p>The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.</p> <p>Local Plans should:</p> <ul style="list-style-type: none"> <li>▪ Make their own assessment of need</li> <li>▪ Develop fair and effective strategies to meet identified need</li> <li>▪ that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective</li> <li>▪ to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply</li> <li>▪ to reduce tensions between settled and traveller communities in plan-making and planning decisions j. to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure k. for local planning authorities to have due regard to the protection of local amenity and local environment</li> </ul>
Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016 - 2021	<p>Brings together the Government's plans for economic infrastructure over the next 5 years with those to support delivery of housing and social infrastructure.</p>
Public Health England, Global Health Strategy 2014 to 2019	<p>The paper summarises the government's strategy to protect the population from serious health threat; helping people live longer, healthier and faster and more fulfilling lives; and improving the health of the poorest, fastest.</p> <p>Outlines the cross-government framework that will enable local communities to reduce inequalities and improve health at key stages in people's lives, including:</p>



	empowering local government and communities, which will have new resources, rights and powers to shape their environments and tackle local problems;
NICE Physical Activity: Walking & Cycling (2012)	This guideline covers encouraging people to increase the amount they walk or cycle for travel or recreation purposes.
Natural England (2014) Green Infrastructure Guidance	Guidance articulates NE's position in relation to green infrastructure planning and delivery, which is increasingly recognised as an essential part of sustainable spatial planning. This is due in no small part to the role of green infrastructure as a life support system, able to deliver multiple environmental functions, and to play a key part in adapting to and mitigating climate change.
Central Bedfordshire Health & Wellbeing Strategy 2012-2016 (refreshed April 2015)	A Vision for Central Bedfordshire where everyone can enjoy a health, safe & fulfilling life. 4 principles to inform how the council will work together to improve health & well-being. 4 cross-cutting priorities: ensuring good mental health & wellbeing at every age; giving every child the best start in life; enabling people to stay health for longer; improving outcomes for frail older people.
Central Bedfordshire Council, Local Transport Plan 3, 2011-2026	The Plan sets out a long term framework for investment in transport across Central Bedfordshire. It establishes a strategic approach through which to deal with key transport issues, a series of objectives, and broad areas of intervention through which schemes will be identified and improvements made to the transport network.
Central Bedfordshire Council, Local Area Transport Plans	A total of 11 individual localised plans cover the plan area, which establish localised issues and sets priority actions and a programme to achieve them.
Central Bedfordshire Council, Housing Strategy 2011/12 - 2015-16	The Strategy sets out the strategic direction for housing in Central Bedfordshire. The key strategic priorities include <ul style="list-style-type: none"> <li>■ Economic development and sustainable communities</li> <li>■ Using council assets to aid the delivery of growth and housing</li> <li>■ Meeting the accommodation and support needs of older persons and vulnerable people</li> <li>■ Providing housing options for the whole community</li> </ul>
Central Bedfordshire Environmental Framework (2016-)	The Environmental Framework brings together brings a range of studies, assessments and guidance documents, covering natural environmental enhancement and protection, sustainable resource management and the challenge of both mitigating the impact of climate change and adapting to the inevitable impacts.
Bedfordshire and Luton Strategic Green Infrastructure Plan (2007)	The Plan sets a spatial vision for establishing a strategic green infrastructure framework for Bedfordshire and Luton which can be used to guide the development of more detailed GI plans.
Greensand Trust, Mid Bedfordshire Green Infrastructure Plan, 2008	The Plan supplements the Strategic GI Plan (above), providing an assessment of the GI assets and opportunities and identifying a GI network of multifunctional spaces and connections that should be protected and enhanced in the future development of the area.
Central Bedfordshire Council, Rent Strategy 2014/15	The Strategy assists in the delivery of new social housing and in providing an offer which is more diverse for the range of people accessing social housing, providing alternatives to traditional social rent.

Central Bedfordshire Council, Leisure Strategy, 2014-2019	The Strategy provides the evidence base and policy standards / facility requirements to secure new or improved leisure facilities as a result of new housing development, and supporting increased health and wellbeing of residents.
Central Bedfordshire Together Local Strategic Partnership, Sustainable Communities Strategy, 2010-2031	The Strategy seeks to improve the economic, social and environmental well-being of the area and the people who live there. It sets priorities for the area underpinned by the themes of creating the conditions for economic success and community prosperity, and raising standards and tackling inequalities.
Neighbourhood Plans	<a href="http://www.centralbedfordshire.gov.uk/planning/policy/neighbourhood-planning/areas.aspx">http://www.centralbedfordshire.gov.uk/planning/policy/neighbourhood-planning/areas.aspx</a> Some 20 Neighbourhood Plans designated in the CBC area that consider local aspirations for the communities.
North Hertfordshire District Council Draft Local Plan 2011-2031	This Local Plan seeks to address the key issues facing North Hertfordshire and will set a strategic vision and spatial strategy for the District over the period 2011 to 2031. The key challenges for the area are <ul style="list-style-type: none"> <li>▪ Identifying and delivering the most sustainable forms and patterns of development around the District,</li> <li>▪ Providing the right type and level of growth to meet the needs of the District and considering the strategic needs of adjoining authorities,</li> <li>▪ Protecting and enhancing the environment and encouraging the prudent use of resources, and</li> <li>▪ Creating places where people want to live, work and spend their leisure time.</li> </ul>
Luton Borough Council, Luton Local Plan 2011-2031	The Luton Local Plan provides a strategy for the distribution and level of development and supporting infrastructure, a set of proposals to meet that strategy, policies to deal with planning applications and proposals for monitoring the success of the plan. 6,700 dwellings need to be delivered in the borough to meet market and affordable housing requirements.
South Cambridgeshire District Council Local Plan	The Local Plan sets the levels of employment and housing development that should be provided over the plan period to best meet the needs of the area and establish a clear strategy for meeting development needs in the most sustainable way that protects the quality of life of existing and future residents. It identifies the objectively assessed need for 22,000 additional jobs and 19,000 new homes in South Cambridgeshire.
Bedford Borough Council Local Plan Draft Local Plan 2032	Bedford Borough Council is preparing a local plan that will set out how much growth there should be in the borough in coming years (housing, jobs and associated infrastructure) and where it should take place. The Draft Plan yet to be published.
Milton Keynes Council Plan	The Local Plan is mainly concerned with development and the environment of the Borough of Milton Keynes, but within a wider economic and social context. Objectives include Improvement to the vitality of town and local centres, the reduction social exclusion and improve equality of opportunity amongst social groups, and access to community facilities, services and information.
Dacorum Borough Council	Saved Local Plan (adopted 2004) and Core Strategy (Adopted 2013). Current work on producing a single Local Plan, with a call for sites undertaken in 2015

St Albans City and District Council Strategic Local Plan 2011-2031	Strategic Local Plan 2011-2031 Publication Draft 2016.
Mayor of London, The London Plan, March 2015	The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The Mayor has also had regard to the principle that there should be equality of opportunity for all people
Aylesbury Vale District Council, Vale of Aylesbury Local Plan	The Vale of Aylesbury Local Plan (Draft Plan due spring 2016) has a housing target of 26,800 new homes, with 14,000 already been granted planning permission and completed since 2003, giving a net figure to find of around 13,000 homes. The forecast requirement for the district is 22ha of employment land whilst the council has a supply of over 70ha. The council is therefore considering which employment sites it can reallocate to other uses including housing. The councils to the south of Aylesbury Vale district have identified an estimated collective unmet need of 12,000 homes.
SA/SEAs of emerging & adopted Local Plans	All Local Plans adjoining the CBC area have been subject to statutory SA incorporating the requirements of the SEA Directive/Regulations.
SA/SEA Report (March 2017) of the draft CBLP	The developing draft CBLP has also been subject to SA/SEA and has informed, and been informed by, this EqIA. This SA includes objectives and criteria on meeting the needs of all residents and communities, improving health and wellbeing, and reducing inequalities.

## Appendix II: Central Bedfordshire Equality and Diversity Impact Assessment Screening

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### EqIA Key and Method Notes:

The assessment uses a simplified version of the SA/SEA appraisal key applied across the plan's draft policies, with the assessment informed by decision aiding questions:

- Will the policy have a negative effect on any of the protected characteristics?
- Will the policy have a positive effect on any of the protected characteristics?
- How can identified negative effect be minimised or removed?
- How can identified positive effect be improved or enhanced?
- Is monitoring of the issues required?

Assessment Key	
+	Positive Effect
-	Negative effect
0	Neutral Effect
?	Unknown or Uncertain Effect

EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<b>Plan Vision</b>									
<i>Central Bedfordshire has taken full advantage of its exceptional strategic position as the central hub of the East-West Oxford to Cambridge growth corridor and its existing strategic north-south routes (M1/A1/East Coast Mainline/Thameslink) to deliver new high tech employment supported by sustainable new homes in a number of new village clusters and market town extensions which are well integrated into the existing high quality landscape. The heritage and distinctiveness of the market towns and villages has been preserved and enhanced by moderate growth ensuring a high quality environment for all residents. The new businesses and population are served by excellent community, transport and communications infrastructure. Multi-service hubs have been delivered to support strong communities and new rail</i>	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
stations at Wixams and Tempsford New Market Town and the Oxford to Cambridge Expressway have ensured excellent connectivity.									
<b>Commentary:</b>									
The Plan Vision outlines how a balanced growth policy will be pursued across Central Bedfordshire that will promote sustainable economic growth, with benefits for all residents, whilst protecting the environment, cultural heritage, character and urban landscape of the area. This will have benefits for all protected characteristics, with positive social, health and economic benefits likely to occur.									
<b>Draft CBC Local Plan Strategic Objectives</b>									
SO1 Ensure sustainable growth including through the provision of community hubs	+	+	+	+	+	+	+	+	+
SO2 Delivering enough homes & jobs to meet needs; good urban design	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
SO3 Conserve and enhance heritage assets and settings	+	+	+	+	+	+	+	+	+
SO4 High quality and sustainable design of neighbourhoods	+	+	+	+	+	+	+	+	+
SO5 Provide employment needs	+	+	+	+	+	+	+	+	+
SO6 Employment land for different sectors & manage surplus land	0	0	0	0	0	0	0	0	0
SO7 Link deprived areas with employment benefits	+	+	+	+	+	+	+	+	+
SO8 Address housing needs in Central Bedfordshire	+	+	+	+	+	+	+	+	+
SO9 Reduce reliance on use of car & promote sustainable transport	+	+	+	+	+	+	+	+	+
SO10 Improve bus and rail facilities; encourage shift from road to freight	+	+	+	+	+	+	+	+	+
SO11 Promote healthier & more active lifestyles	+	+	+	+	+	+	+	+	+
SO12 Encourage wildlife networks & provide new open spaces	+	+	+	+	+	+	+	+	+
SO13 Support adaptation to Climate Change; reduce pollution impacts	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<p><b>Commentary:</b></p> <p>Most the Plan's Strategic Objectives are likely to have positive effects on the protected characteristics. Objectives 1,2,4,5 and 8 will provide housing and help create a safe, high quality and sustainable urban landscape for all protected characteristics to benefit, with social, health and safety benefits for all groups.</p> <p>Objectives 6 and 7 will provide jobs, encourage economic development and ensure deprived areas benefit from economic growth. This will have benefits for all residents in Central Bedfordshire, including protected characteristics.</p> <p>Objectives 9-10 will enhance the existing transport network within Central Bedfordshire and promote sustainable modes of transport, with benefits for all residents, including protected characteristics, due to better accessibility and increased social mobility.</p> <p>Objectives 11 and 12 promote the provision of public open space and increased accessibility to leisure facilities, open spaces and green spaces for all residents. This is likely to have health and social benefits for all protected characteristics.</p> <p>Objective 13 aims to protect the natural environment of Central Bedfordshire, prevent pollution and mitigate climate change effects, with benefits for health and cultural well-being for all residents, including protected characteristics.</p>									



EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<b>Strategic Policies</b>									
Growth Strategy (now SP1)	+	+	+	+	+	+	+	+	+
Presumption in Favour of Sustainable Development (now SP2)	+	+	+	+	+	+	+	+	+
Master Planning for Strategic Growth Locations (now SP3 Generic Requirements for Strategic Sites)	0	0	0	0	0	0	0	0	0
Gypsy and Traveller, and Travelling Showpeople Pitch Requirement (now SP8)	0	0	0	0	0	+	0	0	0
Development in Green Belt, Coalescence, Important Countryside Gaps & Settlement Envelopes (now SP4; SP5; SP7)	+	+	+	+	+	+	+	+	+
<p><b>Commentary:</b> The Growth Strategy Policy will provide housing for Central Bedfordshire, which will have benefits for all residents, including protected characteristics. The Gypsy and Traveller policy will have benefits for the protected characteristic by providing pitches and plots for caravans/motorhomes, with social inclusion benefits. The Green Belt policy focuses on enhancing the positive use of the Green Belt and managing development in the Green Belt to ensure the rural character is protected with likely positive effects for protected characteristics, including health and social benefits through minimising</p>									

EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<p>coalescence and retaining community identities. Other strategic policies will have neutral effects for all protected characteristics.</p> <p>December 2017 updating: The generic requirements for new strategic level development set out in SP3 will ensure at least neutral effects for protected characteristics; specific requirements as set out in strategic policies SA1-4 and SE1-4 will ensure that there is no discrimination and that there is equality of opportunity and accessibility (please see later at the end of this table).</p>									
<b>Development Management Policies</b>									
<b>Infrastructure, Communications &amp; Transport</b>									
1 Provision for Social & Community Infrastructure (now HQ3)	+	+	+	+	+	+	+	+	+
2 Indoor Sport & Leisure Facilities (now HQ4)	+	+	+	+	+	+	+	+	+
3 Broadband & Telecommunications Infrastructure (now HQ5)	+	+	+	+	+	+	+	+	+
4 Strategic Transport Improvements	+	+	+	+	+	+	+	+	+
5 Mitigation of Transport Impacts on the Network (now T1)	+	+	+	+	+	+	+	+	+
6 Highway Safety & Design (now T2)	+	+	+	+	+	+	+	+	+

EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
7 Connectivity & Accessibility	+	+	+	+	+	+	+	+	+
8 Development & Public Transport Interchanges (now T4)	+	+	+	+	+	+	+	+	+
9 Low Emission Vehicles (now T5)	+	+	+	+	+	+	+	+	+
10 Management of Freight (now T6)	+	+	+	+	+	+	+	+	+
11 Parking (now T3)	+	+	+	+	+	+	+	+	+
<p><b>Commentary:</b> The draft policies for Communications &amp; Transport are all likely to have positive effects on protected characteristics. Policies 1 and 2 will protect community and social facilities, including indoor sports facilities, providing social and health benefits for all residents. Policy 3 will ensure certain developments will have superfast broadband and that any new telecommunications equipment will not have negative visual and landscape effects.</p> <p>Policies 4-8 will improve Central Bedfordshire's transport network, providing better public transport and connectivity for all protected characteristics. Policy 9 promotes low emission vehicles, with positive health effects for all residents. Policy 10 will protect communities from the impacts of developments that will result in high levels of freight. Policy 11 ensures adequate and safe parking is provided for developments, benefitting all residents.</p> <p>Promotion of cycling and walking, and ensuring sufficient community and social facilities, will have direct positive effects on health and well-being.</p>									

EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<b>Housing</b>									
1 Housing Mix (now H1)	+	+	+	+	+	+	+	+	+
2 Housing Standards (now H2)	+	+	+	+	+	+	+	+	+
3 Supporting Older People (now H3)	+	0	0	0	0	0	0	0	0
4 Affordable Housing (now H4)	+	+	+	+	+	+	+	+	+
5 Rural Exception Sites (now H5)	+	+	+	+	+	+	+	+	+
6 Starter Homes (now H6)	+	+	+	+	+	+	+	+	+
7 Self & Custom Build Housing (now H7)	0	0	0	0	0	0	0	0	0
<p><b>Commentary:</b> Policy 1 aims to provide a range of housing types that will meet the needs of all sections of the community, including protected characteristics. Policy 2 ensures houses meet defined standards, which includes disability access where appropriate. Policy 3 focuses on providing suitable housing for older people in suitable locations, with positive benefits for this protected characteristic but neutral effects for other protected characteristics.</p>									

EqIA Protected Characteristics Elements of Draft Plan	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<p>Policy 4 outlines the requirement for the development of affordable homes with a mix of tenures, with positive benefits for all protected characteristics. Policy 5 ensures rural exception sites will have affordable housing with a mix of tenures. Policy 6 outlines the Starter Homes requirement, with benefits for younger people and other protected characteristics.</p> <p>Policy 7 ensures that self-build housing does not compromise the ability of the Council to meet housing needs &amp; therefore neutral effects as not really applicable to this assessment. Provision of a range of housing will have positive effects, direct and indirect, on health and wellbeing.</p> <p>December 2017 updating: Policy H2 now includes specific % targets for adaptable and wheelchair accessible homes from all future developments, thus confirming the likely positive effects on protected groups, especially for age and disability characteristics, thus removing any previous concern for the certainty of implementation and equality of opportunity.</p>									
<b>Employment &amp; Economy</b>									
1 Employment Sites and Uses (now EMP1)	+	+	+	+	+	+	+	+	+
2 Change of Non-Employment Uses (now EMP2)	+	+	+	+	+	+	+	+	+
3 Employment Proposals outside Settlement Envelopes (now EMP3)	+	+	+	+	+	+	+	+	+
4 Rural Economy & Tourism (now EMP4)	+	+	+	+	+	+	+	+	+

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5 Significant Facilities in the Countryside, Green Belt (now EMP5)	+	+	+	+	+	+	+	+	+
<p><b>Commentary:</b> The employment and economy policies all aim to ensure that the area has a thriving and growing economy, as well as creating new employment land and protecting existing employment land. These policies will help Central Bedfordshire with new jobs and a strong economy, benefitting residents and including all those with protected characteristics.</p> <p>Provision of jobs and local employment will have positive effects, direct and indirect, on health &amp; well-being.</p>									
<b>Retail &amp; Town Centre Uses</b>									
1 Town Centre Uses (now R1 Ensuring Town Centre Vitality)	+	+	+	+	+	+	+	+	+
2 Retail for minor services centres, villages and the rural economy (R2)	+	+	+	+	+	+	+	+	+
3 Town Centre Development (now R3)	+	+	+	+	+	+	+	+	+
<p><b>Commentary:</b> The retail and town centre policies aim to encourage development of town centres and the creation of new retail uses that will support vibrant and diverse neighbourhoods, as well as the protection of existing facilities. Residents, including all protected characteristics groups, will benefit from the improvement to their local environment, with positive social, health and economic benefits likely to occur.</p>									

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<b>Environmental Enhancement</b>									
1 Green Infrastructure (now EE1)	+	+	+	+	+	+	+	+	+
2 Enhancing ecological networks (now EE2 Enhancing Biodiversity)	+	+	+	+	+	+	+	+	+
3 Nature Conservation (now EE3)	+	+	+	+	+	+	+	+	+
4 Trees, Woodlands & Hedgerows (now EE4)	+	+	+	+	+	+	+	+	+
5 Landscape Character and Value (now EE5)	+	+	+	+	+	+	+	+	+
6 Tranquillity (now EE6)	+	+	+	+	+	+	+	+	+
7 The Chilterns Area of Outstanding Natural Beauty (now EE7)	+	+	+	+	+	+	+	+	+
8 Greensand Ridge Nature Improvement Area (now EE8)	+	+	+	+	+	+	+	+	+
9 Forest of Marston Vale (now EE9)	+	+	+	+	+	+	+	+	+
10The Bedford & Milton Keynes Waterway Park (now EE10)	+	+	+	+	+	+	+	+	+

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Policy EE1 The River & Waterway Network	+	+	+	+	+	+	+	+	+
11 Public Rights of Way (now EE12)	+	+	+	+	+	+	+	+	+
12 Outdoor sport, leisure & open space (now EE13)	+	+	+	+	+	+	+	+	+
13 Climate Change & Sustainability (now CC1)	+	+	+	+	+	+	+	+	+
14 Renewable Energy Development (now CC2 Sustainable Energy)	+	+	+	+	+	+	+	+	+
15 Flood Risk Management (now CC3)	+	+	+	+	+	+	+	+	+
16 Development close to watercourses (now CC4)	+	+	+	+	+	+	+	+	+
17 Sustainable Drainage (now CC5)	+	+	+	+	+	+	+	+	+
18 Water Quality (now CC7)	+	+	+	+	+	+	+	+	+
19 Pollution (now CC8 Pollution & Land Instability)	+	+	+	+	+	+	+	+	+
20 Applications for Minerals & Waste Development	+	+	+	+	+	+	+	+	+



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<p><b>Commentary:</b> Policies 1-10 aim to protect and enhance the natural environment within Central Bedfordshire. The protection of the environment will result in positive effects for local residents and protected characteristics such as benefits for health and cultural well-being.</p> <p>Policies 11 and 12 will result in positive benefits for all groups through maintaining/enhancing access to footpaths and leisure facilities with positive effects for health &amp; well-being that will be cumulative in the longer term.</p> <p>Policies 13-20 will help reduce residents' exposure to environmental risks such as flooding and pollution, as well as focusing on promoting sustainability and renewable energy sources, with positive effects for all protected groups' health and safety.</p>									
<b>High Quality Development</b>									
1 Successful and Sustainable Places (now HQ1 High Quality)	+	+	+	+	+	+	+	+	+
2 Back-land Development (now HQ8)	+	+	+	+	+	+	+	+	+
3 Larger Windfall Sites (now HQ9)	+	+	+	+	+	+	+	+	+
4 Small Open Spaces (now HQ 10)	+	+	+	+	+	+	+	+	+
Policy HQ2 Planning Obligations & Community Infrastructure Levy	+	+	+	+	+	+	+	+	+

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Policy HQ7 Public Art	+	+	+	+	+	+	+	+	+
Policy HQ11 Modern Methods of Construction	+	+	+	+	+	+	+	+	+
<p><b>Commentary:</b> Policies relating to high quality development will have wide ranging benefits for all residents. Policy 1 ensures that developments will meet building design standards that will help prevent crime, allow safe access for all residents, and minimise negative effects such as noise and light pollution. Policy 2 ensures back-land site development integrates well, is of high standard, and has good access for all residents.</p> <p>Policy 3 focuses on large windfall sites having mixed-use developments. Policy 4 ensures visual amenity values and ecological networks in the area are not adversely affected by new development. These policies will have benefits for all residents, including health benefits, safety benefits and social mobility benefits, all through the creation of a safe and well-designed urban landscape.</p>									
<b>Historic Environment</b>									
1 Archaeology (now HE1)	+	+	+	+	+	+	+	+	+
2 Historic Parks & Gardens (now HE2)	+	+	+	+	+	+	+	+	+
3 Built Heritage (now HE3)	+	+	+	+	+	+	+	+	+

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<p><b>Commentary:</b> These policies seek to protect designated heritage assets, which can result in positive effects for residents &amp; all protected groups with regard to social, health and cultural benefits.</p>									
<p><b>Development in the Countryside</b></p>									
1: New Dwellings in the Countryside (now DC2)	+	+	+	+	+	+	+	+	+
2: Re-use & Replacement of Buildings in the Countryside (now DC1)	+	+	+	+	+	+	+	+	+
3: Redundant Sites within the Countryside	+	+	+	+	+	+	+	+	+
4: Rural Workers Dwellings (now DC3)	+	+	+	+	+	+	+	+	+
5: Equestrian & Livestock Related Development (now DC4)	0	0	0	0	0	0	0	0	0
6: Agricultural Land (now DC5)	+	+	+	+	+	+	+	+	+
<p><b>Commentary:</b> Policies 1-4 focus on development in the rural areas of Central Bedfordshire, with a focus on reusing and redeveloping existing redundant buildings, and enabling key workers to live near their work. There are possible positive effects for all protected characteristics due to the provision of new housing in a sustainable way by renovating buildings.</p>									

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<p>Policy 5 is specifically for animal related development, and therefore unlikely to be directly relevant for protected characteristics. Indirect positive effects on all protected characteristics and health/wellbeing through protection of rural economy &amp; jobs.</p> <p>Policy 6 will protect best and most versatile agricultural land which will have positive benefits for all groups due to the protection of their environment and the local economic benefits of maintaining a thriving agricultural industry.</p> <p>Encouraging locally grown food will also have positive effects for health and well-being.</p>									
<b>Allocation Policies</b>									
SA1 North of Luton	+	+	+	+	+	+	+	+	+
SA2 Marston Vale New Villages	+	+	+	+	+	+	+	+	+
SA3 East of Arlesey	+	+	+	+	+	+	+	+	+
SA4 East of Biggleswade	+	+	+	+	+	+	+	+	+
SA5 Houghton Regis North	+	+	+	+	+	+	+	+	+
SE1 M1 Junction 11a RFI	+	+	+	+	+	+	+	+	+
SE2 M1 Junction 13 Marston Gate	+	+	+	+	+	+	+	+	+
SE3 A1 Corridor	+	+	+	+	+	+	+	+	+
SE4 Former RAF Base Henlow	+	+	+	+	+	+	+	+	+
HA1 Small and Medium Allocations	+	+	+	+	+	+	+	+	+
<p>The Allocation Policies set out the sites which are to provide a large proportion of new housing and employment land across the Central Bedfordshire area. They are subject to the requirements of the other Plan Policies but also include</p>									

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<p>additional requirements which are specific to the sites and therefore are considered to lead to positive effects on the protected characteristics.</p> <p>Particular additional requirements such as provision of community, health and education facilities, green infrastructure and sustainable transport are likely to ensure that there is equality of opportunity and to secure further positive effects.</p>									