Greater Nottingham
Aligned Core Strategies
Equality Impact Assessment
Phase 1 Report April 2011

Broxtowe Borough Council · Erewash Borough Council · Gedling Borough Council · Nottingham City Council · Rushcliffe Borough Council

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1 Introduction

1.1 Background

1.1.1 An Equality Impact Assessment is defined by the Equality & Human Rights Commission as "*…a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody*"[1]. Undertaking Equality Impact Assessments allows local authorities to identify any potential discrimination caused by their policies or the way they work and take steps to make sure that it is removed. Equality Impact Assessments also allow for the identification of opportunities to promote equality.

1.1.2 The councils of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe are working with Derbyshire and Nottinghamshire County Councils to prepare a new aligned and consistent planning strategy for Greater Nottingham. Ashfield District Council is also involved in developing strategic policies but is preparing its own Core Strategy and Equality Impact Assessment. The Aligned Core Strategies are important long term documents for Greater Nottingham and will include policies on a wide range of topics. To make sure that they meet the needs of all members of the community it is important to use the Equality Impact Assessment to identify potential discrimination and opportunities to promote equality.

1.2 What is an Equality Impact Assessment?

1.2.1 Paragraph 1.1 identifies that an Equality Impact Assessment is a management tool that makes sure that policies and working practises do not discriminate against certain groups and that opportunities are taken to promote equality.

1.2.2 Equality Impact Assessments have their origin in the Macpherson Enquiry into the Metropolitan Police Force and the subsequent Race Relations (Amendment) Act 2000. Under the legislation, all public bodies were required to produce Race Equality Schemes to make sure there was no potential for negative differential impact on people from black, Asian or minority ethnic communities. The principles of this legislation have now been extended to require Equality Impact Assessments for disability and gender and all public bodies are required to produce Equality Schemes for race, disability and gender.

1.2.3 In undertaking Equality Impact Assessments, many public bodies have decided to include other equality strands within the assessments. Although not part of current legislation, these strands may require Equality Impact Assessments in future years. Each Local Authority has internal guidance on how to complete Equality Impact Assessments which include requirements to assess the following strands in addition to those required by law:

- Age
- Sexual Orientation
- Religion or Belief

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1   Equality & Human Rights Commission "Equality Impact Assessment Guidance" (Nov 2009) p.3

1.2.4   An Equality Impact Assessment should not be an afterthought and should inform the development of policies. As such, there is a requirement to carry out assessments throughout the process of developing the Aligned Core Strategies.

1.2.5   Current legislation places a duty on the public sector to have 'due regard' to a number of issues these are:

Race[2]

- The need to eliminate unlawful racial discrimination.
- The need to promote equality of opportunity.
- The need to promote good relations between people of different racial groups.

Gender[3]

- The need to eliminate unlawful sex discrimination and harassment (including for transsexual people).
- The need to promote equality of opportunity between men and women.

Disability[4]

- The need to promote equality of opportunity between disabled persons and other persons.
- The need to eliminate discrimination that is unlawful under the Act.
- The need to eliminate harassment of disabled persons that is related to their disabilities.
- The need to promote positive attitudes towards disabled persons.
- The need to encourage participation by disabled persons in public life.
- The need to take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons.

1.2.6   The Equality Act 2010 is in the process of being enacted and will be fully in place by April 2011. This will replace the three separate Public Sector duties with a single duty covering all protected strands. This general duty[5] will require that public bodies have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

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2   Race Relations (amendment) Act 2000
3   Equality Act 2006, amending the Sex Discrimination Act
4   Disability Discrimination Act (amended 2005).
5   Equality Act 2010 section 149

1.2.7 'Due regard' means that a public body must give weight to the duties outlined above in proportion to its relevance when discharging their functions. As shown in recent case law[6] this must be done in a conscious way with focus on the specific requirements of the legislation. Therefore this Equality Impact Assessment and the changes that result from it will be an important part of the decision to adopt the Aligned Core Strategies as part of the development plan for the Local Authorities involved.

1.3 What are the Aligned Core Strategies?

1.3.1 As part of the current system, Local Authorities have to produce a 'Local Development Framework' which is a folder of different documents which help to protect the environment and steer how and where communities will grow and develop.

1.3.2 The Aligned Core Strategies together with other documents produced individually by the Local Authorities will form the Development Plan for the area. The Coalition Government has announced its intention to make a number of changes to the Planning System to introduce a more 'localist' approach through the Localism Bill [7] with greater control over planning matters at a local and neighbourhood level. These changes will include the removal of the East Midlands Regional Plan from the Development Plan and the reversion of issues covered to the control of Local Authorities.

1.3.3 In order to produce a consistent and comprehensive strategy for Greater Nottingham, the Local Authorities identified in Paragraph 1.2 decided to work together to make sure that administrative boundaries do not get in the way of good planning and service delivery. This approach is supported by the elected members and will continue under any new planning system. The content of the final versions of the Aligned Core Strategies are under review pending consideration of the Localism Bill.

1.3.4 The Aligned Core Strategies will be the key strategic planning documents and will perform the following functions:

- Define a spatial vision for each council to 2026, within the context of an overall vision for Greater Nottingham;
- Set out a number of spatial objectives to achieve the vision;
- Set out a spatial development strategy to meet these objectives;
- Set out strategic policies to guide and control the overall scale, type and location of new development (including any particularly large or important sites, known as 'strategic sites') and infrastructure investment; and
- Indicate the number of new homes to be built over the plan period.

1.3.5 The strategy is not a formal Joint Core Strategy as decisions relating to it have been made by each council separately; consequently the strategies are known as the Aligned Core Strategies. Each council is advised by the Greater Nottingham Joint Planning Advisory

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6   R (on the application of Harris) v London Borough of Haringey (Equality and Human Rights Commission intervening) - [2010] All ER (D) 177 (Jun)
7   http://services.parliament.uk/bills/2010-11/localism/documents.html

Board, which is made up of the lead planning and transport councillors from each of the councils. The Joint Board meet regularly and oversees preparation of the Aligned Core Strategies.

1.3.6   The timetable below provides information regarding the remaining stages towards adoption of the Aligned Core Strategies. An extra phase of public consultation has been built into the original timetable to address matters which were previously covered by the Regional Plan and now need to be addressed in the Aligned Core Strategies. The key issue to be addressed by this extra stage of consultation will be the number of new dwellings to be provided for in Greater Nottingham. To inform this, work is currently being undertaken to use household projections to model a number of scenarios.

Winter 2010/11	Work on developing household projection scenarios
Spring 2011	Prepare Options Consultation
May 2011	Local Elections
Summer 2011	Consultation on Options
Autumn 2011	Prepare Submission Draft of Aligned Core Strategies
Winter 2011/2012	Publish Submission Draft of Aligned Core Strategies
Spring 2012	Submission of Aligned Core Strategies
Summer 2012	Public Examination
Early 2013	Anticipated Adoption of Aligned Core Strategies

Table 1.1 Timetable for the adoption of the Aligned Core Strategies

1.3.7   At the time of writing the Aligned Core Strategies have reached the Option for Consultation stage and include the following policies:

1.   Climate Change
2.   The Spatial Strategy
3.   The Sustainable Urban Extensions
4.   Employment Provision and Economic Development
5.   Nottingham City Centre
6.   The Role of Town and Local Centres
7.   Regeneration
8.   Housing Size, Mix and Choice
9.   Gypsies, Travellers and Travelling Showpeople
10. Design, the Historic Environment and Enhancing Local Identity
11. Local Services and Healthy Lifestyles
12. Culture, Sport and Tourism
13. Managing Travel Demand
14. Transport Infrastructure Priorities
15. Green Infrastructure, Parks and Open Space

1.4 Methodology

1.4.1   In complying with the duty to assess impact, each of the five local authorities involved with the Aligned Core Strategies has produced guidance on preparing Equality Impact Assessment and templates to undertake the assessment. While according with the guidance produced by the Equality and Human Rights Commission, each of the approaches differs slightly and was designed for the assessment of policies and functions carried out by the local authority alone. Given the nature and scope of the Aligned Core Strategies process it has been agreed to develop a bespoke methodology for this Equality Impact Assessment based on the guidance produced by the individual Local Authorities and the Equality & Human Rights Commission.

1.4.2   Due to the scope of the Aligned Core Strategies it is deemed that an Equality Impact Assessment is required. It has been decided to assess each of the nineteen policies listed in Paragraph 3.6 individually. Due to the wide range of issues covered, an Equality Impact Assessment of the Aligned Core Strategies as a whole would prove difficult and could potentially result in masking important impacts on particular groups.

1.4.3   To allow the best use of resources and meet the requirement for Equality Impact Assessments to influence policy development it is proposed to take a two phase approach to assessing the Aligned Core Strategies. The first phase will scope and assess the policies within the Option for Consultation stage. This phase will be the subject of specific consultation with those involved with equality.   The Action Plan arising from this phase will inform the development of the Submission Draft which is the final stage for public consultation on the Aligned Core Strategies.

1.4.4   We are required to publicise the findings and recommendations of the Equality Impact Assessments and seek the views of those with knowledge of equality issues on both the methodology and the findings.   Alongside this report we are therefore producing a questionnaire and organising workshops. The two phases of Equality Impact Assessment can be seen as a learning process allowing the local authorities involved to test the findings and recommendations and take account in the second phase of any issues which have been identified through consultation.

1.4.5   The second phase of the Assessment will look at the policies as they stand in the Submission Draft. It is not expected that the changes from the Option for Consultation stage will be significant in terms of the equality strands and the aim of the policy will be similar to those in the Option for Consultation and will have been drafted in the light of the Phase 1 Equality Impact Assessment report and the responses to it. Consultation on this phase of the Assessment will be combined with the final round of public consultation. After this stage changes to the policy should only be minor and not materially alter the policy. If significant changes are needed a further phase of Equality Impact Assessments may be required.
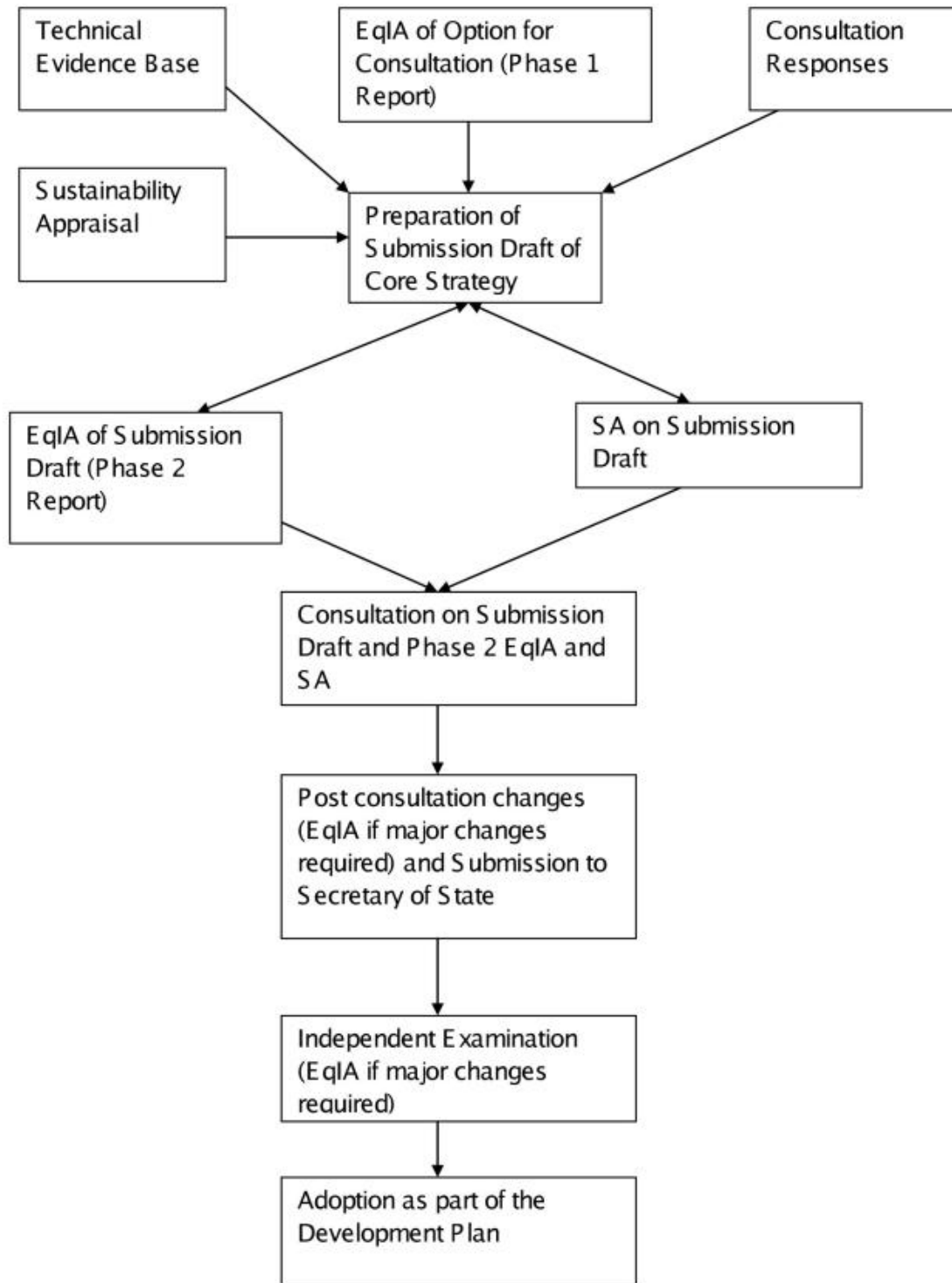
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┌──────────────┐      ┌──────────────────┐      ┌──────────────┐
│ Technical    │      │ EqIA of Option   │      │ Consultation │
│ Evidence Base│      │ for Consultation │      │ Responses    │
│              │      │ (Phase 1 Report) │      │              │
└──────────────┘      └──────────────────┘      └──────────────┘

┌──────────────┐      ┌──────────────────┐
│ Sustainability│     │ Preparation of   │
│ Appraisal     │ ──> │ Submission Draft │
│               │     │ of Core Strategy │
└──────────────┘      └──────────────────┘

┌──────────────────┐              ┌──────────────────┐
│ EqIA of Submission│             │ SA on Submission │
│ Draft (Phase 2    │             │ Draft            │
│ Report)           │             │                  │
└──────────────────┘              └──────────────────┘

        ┌──────────────────────────────┐
        │ Consultation on Submission   │
        │ Draft and Phase 2 EqIA and SA│
        └──────────────────────────────┘

        ┌──────────────────────────────┐
        │ Post consultation changes    │
        │ (EqIA if major changes       │
        │ required) and Submission to  │
        │ Secretary of State           │
        └──────────────────────────────┘

        ┌──────────────────────────────┐
        │ Independent Examination      │
        │ (EqIA if major changes       │
        │ required)                    │
        └──────────────────────────────┘

        ┌──────────────────────────────┐
        │ Adoption as part of the      │
        │ Development Plan             │
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Figure 1.1 How the Equality Impact Assessments informs the Aligned Core Strategies Process

1.4.6   As per paragraph 1.2.3 the impact of the policies within the Aligned Core Strategies will be assessed against the following equality strands:

- **Race** - refers to a person's race, colour, nationality and ethnic or national origins.

- **Gender & Gender Identity** – refers to a man or women or a person in the process of transition from one gender to another.
- **Disability** – refers to a physical or mental impairment which has a substantial and long term adverse effect on the ability to carry out normal day-to-day activities.
- **Age** – refers to a person belonging to a particular age or range of ages.
- **Sexual Orientation** – refers to a person's sexual attraction towards their own sex, the opposite sex or both sexes.
- **Religion or Belief** - religion is the belief in and worship of a god or gods, or a set of beliefs concerning the origin and purpose of the universe. Belief includes religious and other philosophical beliefs which affect life choices or the way people live.

1.4.7   For the Equality Impact Assessment of the Aligned Core Strategies the following stages will be undertaken, based on the guidance produced by the individual Local Authorities and the Equality & Human Rights Commission:

1. Evidence Gathering – this stage will pull together the headline statistics relevant to each of the six equality strands identified. See Section 2 of this document.
2. Scoping of Relevance – this stage will examine each of the nineteen policies in the Aligned Core Strategies and screen out those that are not considered to be relevant to the equality strands. It will grade policies in terms of High, Medium or Low relevance to the strands. See section 3 of this document.
3. Impact Assessment – this stage will examine in detail those policies deemed to be relevant to the equality strands and consider the likely impact of each. See section 4 of this document.
4. Action Plan – this stage will follow on from the full Impact Assessment and identify what needs to happen to the Aligned Core Strategies policy under consideration in the light of its impact. See section 6.1 of this document.
5. Continuous Monitoring – this stage will comprise two elements. The first will be the identification of monitoring indicators, which will be incorporated into Annual Monitoring Reports. The second stage will be monitoring and reporting on the effect of the Aligned Core Strategies and planning decisions to inform future plans. See section 6.2 of this document.

1.4.8   Detail on each stage of the Equality Impact Assessment is provided in the relevant section. A flow chart that sets out the process and decisions that need to be made is attached as Appendix 1 to this report. The table below sets out the timetable for completion of the Equality Impact Assessment phases.

April 2010	Phase 1 start
April – June 2010	Evidence gathering
June - July 2010	Scoping Stage workshops held
July - August 2010	Impact Assessments undertaken
September 2010	Action Plan produced
April 2011	Publication and consultation on Phase 1 report

May 2011	Report of consultation produced
Summer 2011	**Phase 2 start**
Summer 2011	Evidence gathering
Autumn 2011	Scoping stage
Autumn 2011	Impact Assessment
Autumn 2011	Action Plan produced
Winter 2011/2012	Publication and consultation on Phase 2 report
Ongoing	Monitoring

Table 1.2 Timetable for the completion of the Equality Impact Assessment

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2 Statistics

2.1 Introduction

2.1.1   The Equality & Human Rights Commission Guidance promotes the use of statistics and background information to help identify key issues of importance and provide information on the make-up of those using the service or policy that is the subject of the Equality Impact Assessment.

2.1.2   In many cases, the people who will use the service or policy will be a discrete group. An example given is in relation to new forms to be used in the licensing of private hire taxis. Changes to the forms would obviously affect the drivers of the taxis and a significant proportion of them may be from ethnic minority backgrounds. Therefore the form needs to be appropriately designed and worded to allow all taxi drivers to use the form easily.

2.1.3   In contrast, the Aligned Core Strategies will have a wide ranging impact on the whole population of Greater Nottingham. Employment, retail, parks & open space, local services, schools as well as housing are all issues that are addressed by the Aligned Core Strategies in delivering the place-shaping aim of spatial planning.

2.1.4   For each of the six equality strands identified, key statistics and trends that show the situation in Greater Nottingham have been compiled from a variety of sources including the Office of National Statistics (ONS). A tool that has proved very useful is Nottingham Insight[8] which includes a wide range of statistics and allows maps to be produced showing the spatial distribution of different statistics.

2.1.5   As mentioned in paragraph 1.1.2, Ashfield District Council is also involved in the Aligned Core Strategy work but is producing a separate Core Strategy. This is because only the Hucknall part of Ashfield is part of the Greater Nottingham conurbation, with the rest of the District being part of the Nottingham Outer Housing Market Area. As such, to avoid confusion references to Greater Nottingham do not include Hucknall and statistics have only been collected for Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe.

2.1.6   The rest of this section takes each of the six equality strands in turn and identifies key statistics and trends.

2.2 Race

Local Authority	% Black, Asian and Minority Ethnic Households
Broxtowe	4.6%
Erewash	2.0%
Gedling	3.8%

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8   http://www.nottinghaminsight.org.uk/

Nottingham	15.3%
Rushcliffe	4.3%
Overall	8.1%

Table 2.1 Percentage of Black, Asian and Minority Ethnic Households by District [9]

2.2.1   Across the conurbation it is estimated that in 2007 around 11% of population was from ethnic minority backgrounds[10]. This figure varies across the local authorities, with Nottingham City being the most ethnically diverse with an estimated 25% of its 2007 population as being not from 'White British' backgrounds. The estimated figure for the other Local Authorities varies between around 4% in Erewash to around 7% in Broxtowe, Gedling and Rushcliffe. Figure 2.1 shows the breakdown of the non-white population by Local Authority.
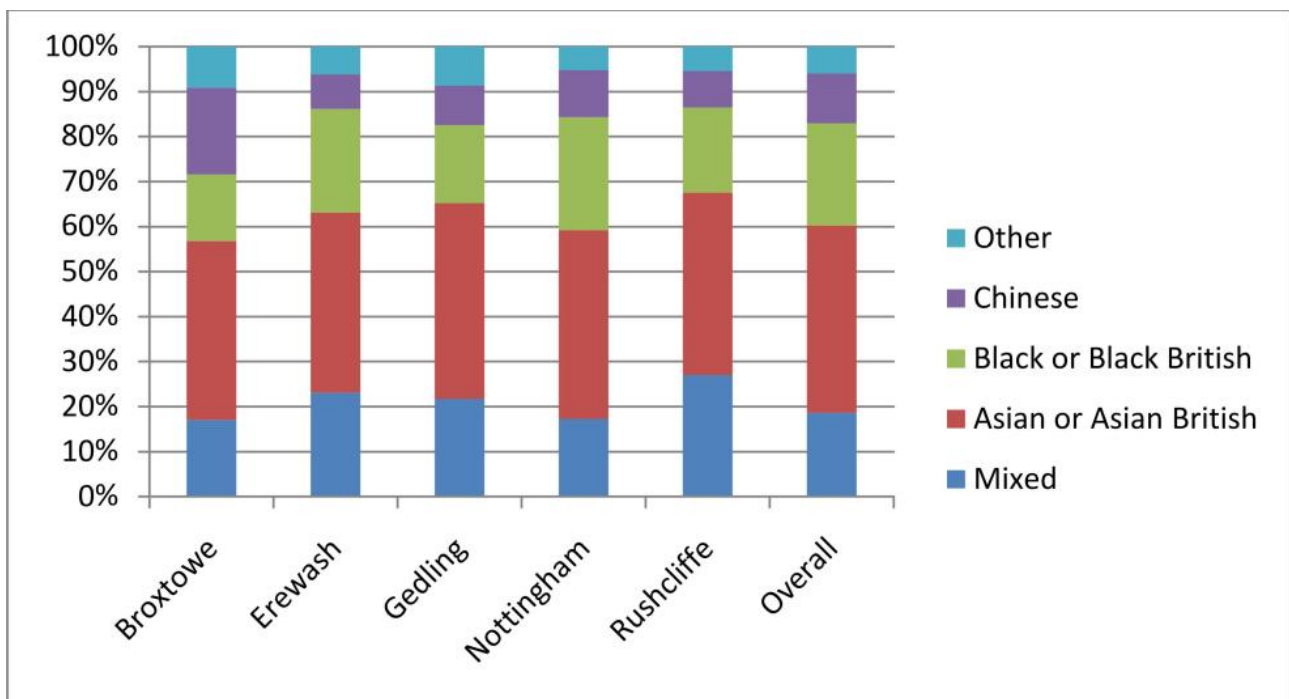
Figure 2.1 Non-white Population by District - Adapted from Office of National Statistics Census (April 2001) and ONS Residential Population Estimates (September 2009)

2.2.2   Work carried out for the Strategic Housing Market Assessment identified that the most notable communities are the Pakistani community in the Radford area and the Afro-Caribbean community in St Ann's[11]. These communities have formed for a number of reasons, including for community or religious reasons as well as economic reasons. Outside the City Council area, no discernible pattern was evident with small numbers of people from ethnic minority backgrounds in many areas.

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9   Adapted from Strategic Housing Market Assessment (April 2007) Table 206 p238
10   Office of National Statistics Residential Population Estimates (September 2009)
11   Strategic Housing Market Assessment (April 2007) page 247

	2001 Census	**2007 (estimated)**	**% change**
White	646133	647500	+ 0.21%
Mixed	12247	15700	+ 28.19%
Asian or British Asian	24096	34700	+ 44.00%
Black or Black British	14216	19000	+ 33.65%
Chinese	3251	9200	+ 182.98%
Other	2101	5000	+ 137.98%
Overall	702044	731100	+ 4.10%

Table 2.2 Population of Greater Nottingham by Ethnic Grouping [12]

2.2.3   Table 2.2 shows that there have been significant recent increases in all non-white ethnic communities especially those from Chinese and Other Ethnic backgrounds. However, these may be affected by the relatively small numbers involved. The recent period of high international in-migration may account for much of the increase as will differences in birth rates between ethnic groups. Where there was already a significant community, migrants into Greater Nottingham from similar ethnic backgrounds are likely to integrate into that existing community. Where no established community existed, migrants are likely to locate in areas which have a diverse ethnic makeup, perhaps due to the accessibility of the housing market in those areas.

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12   Adapted from Office of National Statistics Census (April 2001) and ONS Residential Population Estimates (September 2009)
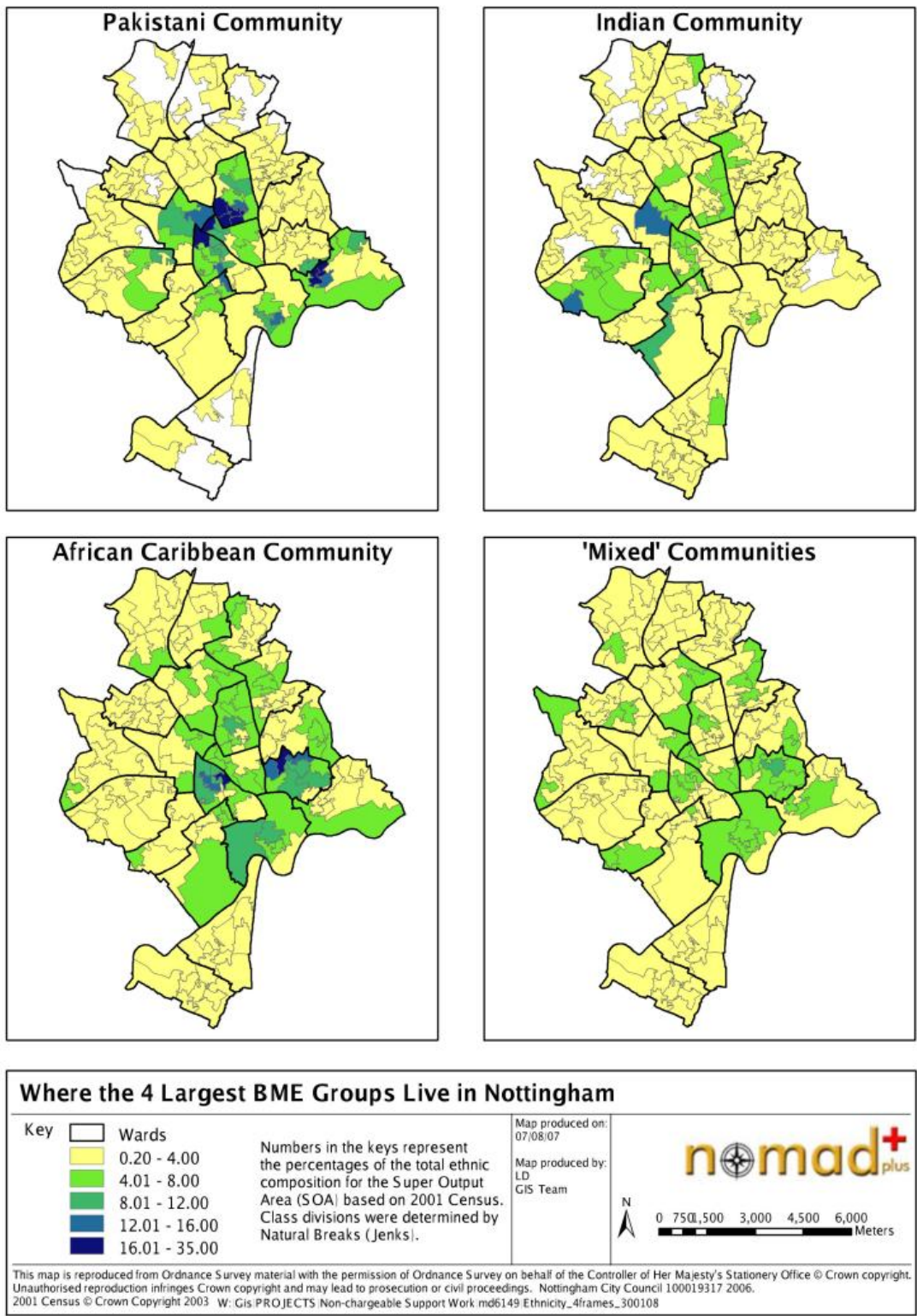
Map 2.1 Distribution of certain ethnic groups in Nottingham City

2.2.4 The Strategic Housing Market Assessment identifies that many from Black, Asian and Minority Ethnic groups are "currently living in unsuitable housing either due to the poor condition of their homes or the inadequate size"[13]. Specific issues were identified with the Pakistani community and outstanding repairs to their homes and also with overcrowding with the Black community.

2.3 Gender

	Total	Male	Female
Nottingham	266988	132530	134458
		49.63%	**50.36%**
Broxtowe	107570	52884	54686
		49.16%	**50.83%**
Gedling	111787	54261	57526
		48.53%	**51.46%**
Rushcliffe	105599	51809	53790
		49.06%	**50.93%**
Erewash	110099	53864	56235
		48.92%	**51.07%**
Total	702043	345348	356695
		49.19%	**50.80%**

Table 2.3 Gender by District Adapted from Office of National Statistics Census (April 2001)

2.3.1 Table 2.3 shows, that although there is variation between the districts, overall the figures accord with the England wide figure of approximately 51% female and 49% male. Figures for areas within the conurbation do not show significant variation from this split.

2.3.2 Women live around 4 years longer than men although the gap is narrowing. However, life expectancy generally is affected by socio-economic factors with those in the highest groups living up to seven years longer than those in the lowest groups[14]

2.3.3 As figure 2.2 shows, women are less likely to have access to cars in their households and are less likely to drive than men. This means they will be more reliant on public transport.

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13 Strategic Housing Market Assessment (April 2007) page 245
14 Equality & Human Rights Commission "Triennial Review Executive Summary" (2010) page 10

Although the proportion is coming down, two-fifths of women still do not drive. This compares with a quarter of men.

Legend: Car in household but non-driver; No car in household

Men: 1976, 1986, 1996, 2009
Women: 1976, 1986, 1996, 2009

Source: National Travel Survey, DfT; Great Britain; updated Jul 2010

Figure 2.2 Difference in access to cars between men and women

2.4 Disability

	Less than 12 Months	1-2 Years	2-5 Years	5 Years and Over
Nottingham	1150	1260	3100	13570
Erewash	390	370	820	3990
Broxtowe	320	350	800	3770
Gedling	330	380	950	4020
Rushcliffe	230	240	570	2620

Table 2.4 Number of Disability Living Allowance Claimants Adapted From Department of Work and Pensions (August 2009)

2.4.1   Table 2.4 shows the number of people claiming Disability Living Allowance in Greater Nottingham and how long they have been claiming it. However, this does not cover all people defined as disabled as some people may not meet the criteria, may not wish to claim or may not be aware they can claim. Figure 2.3[15] shows the main disabling condition of the almost 2.5 million people receiving Disability Living Allowance in 2003.

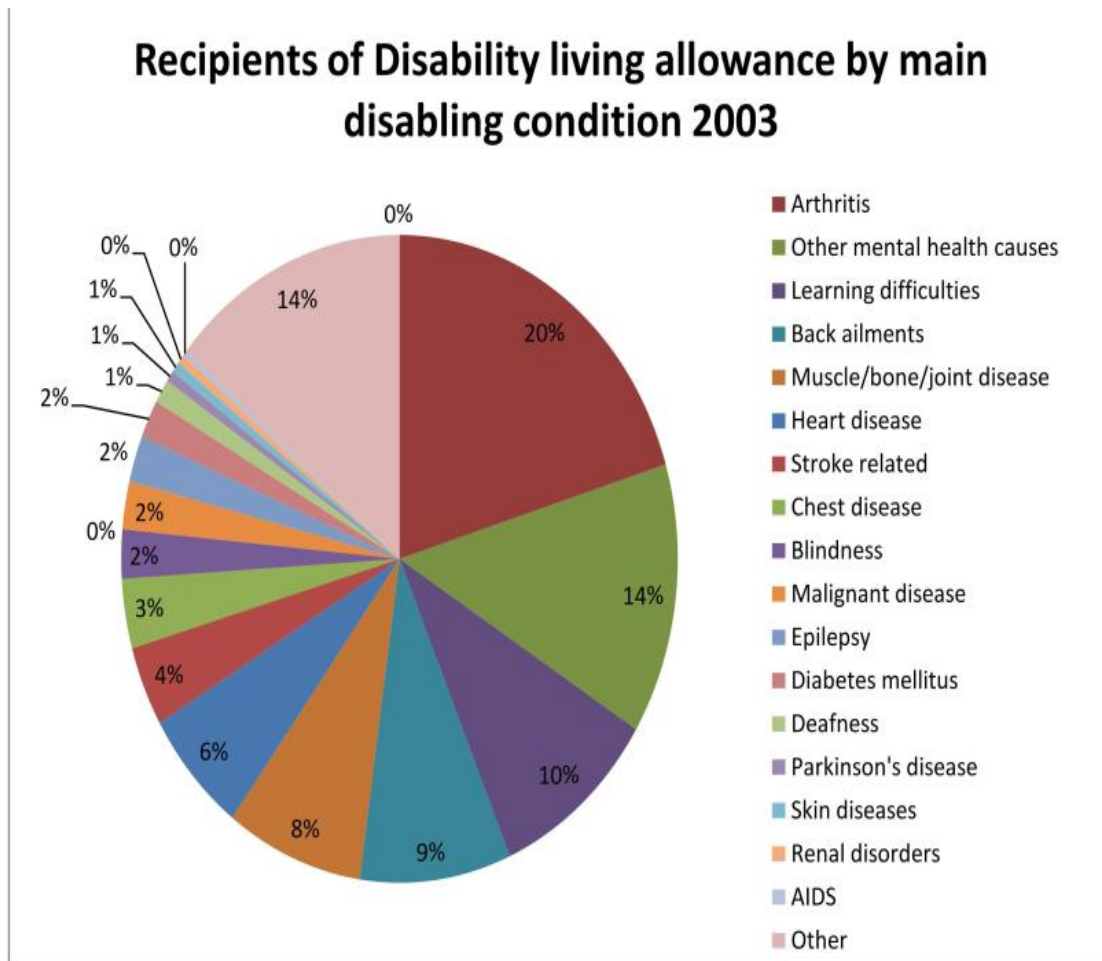15   Adapted from Office of National Statistics Social Trends (2004)
      http://www.statistics.gov.uk/STATBASE/ssdataset.asp?vlnk=7403&More=Y

Recipients of Disability living allowance by main disabling condition 2003

Figure 2.3 Main qualifying disability of Disability Living Allowance recipients

2.4.2   A survey for the Disability Rights Commission[16] estimated that around 10 million people in the UK are disabled. Within this figure there is a wide range of different disability types with an equally wide variety in how the built environment can be better designed to meet the needs of a person with a disability.
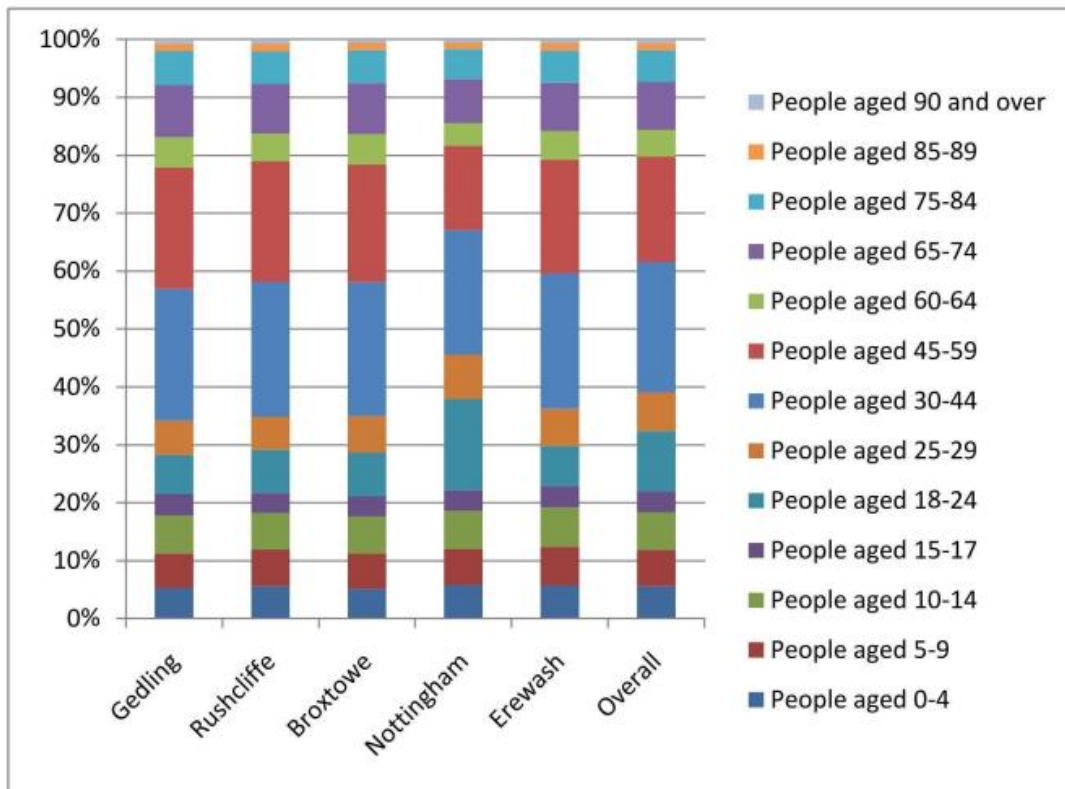
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16   http://www.dlf.org.uk/content/key-facts

2.5 Age

Figure 2.4 Age profile by Local Authority adapted from Office of National Statistics Census (April 2001)

2.5.1 The age profile of the conurbation reflects other equality strands, with the outer Local Authorities being similar to each other and Nottingham City being unique. The age profile of Nottingham City is younger than the other districts with a significantly higher proportion of 18-24 year olds, perhaps reflecting that the City includes the main areas where students of the two Universities reside and that Nottingham City has smaller, often cheaper houses than the other districts. This is especially clear in the Dunkirk & Lenton ward of Nottingham City, where almost 70% of the population is between 16 and 29.

2.5.2 Conversely, the outer districts, especially rural areas in the south of Rushcliffe, have an older population with more people over the age of 45. Nationally, the trend is of an ageing population which will have an impact on many aspects of society and will require careful consideration through the planning process. This will include the increase in the need for personal care and people caring for relatives[17].

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17   Equality & Human Rights Commission "Triennial Review Executive Summary" (2010) page 34
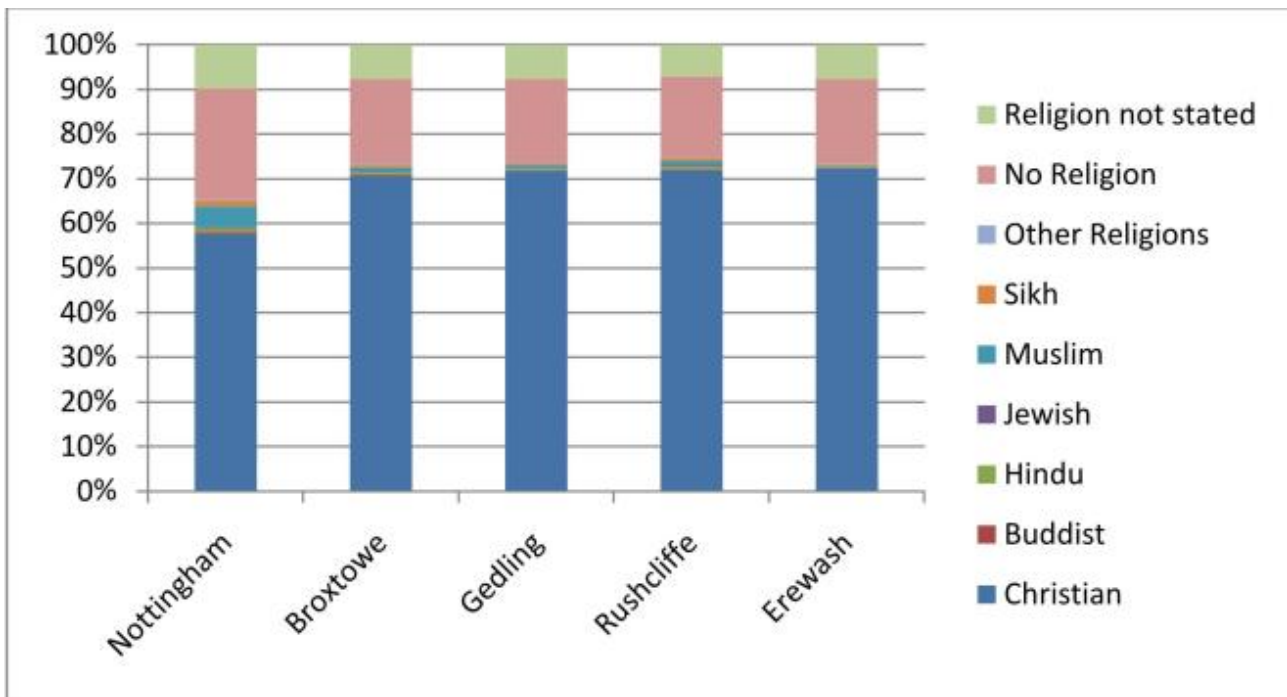
2.6 Religion

Figure 2.5 Religion by Local Authority Adapted from Office of National Statistics Census (April 2001)

2.6.1 While religion is often linked to ethnic background, it is important to note that this is not automatically true. However, the pattern of the religious make-up of the conurbation does follow a similar pattern to the ethnic background with a more diverse picture within Nottingham City than the other Districts. Christianity is the main religion represented with over 65% of the conurbation identifying themselves as Christian. Of the other religions, the most notable group are Muslims within Nottingham City and this community may be based around the Pakistani community in the Radford area.

2.7 Sexual Orientation

2.7.1 The Census has not previously included questions regarding sexual orientation. As such we have no baseline figures for Greater Nottingham. Impact assessments produced by national government have estimated that between 5-7% of the UK population is gay, lesbian or bisexual. Stonewall, a national charity involved in gay, lesbian and bisexual issues consider this a reasonable estimate. However, recent work by the Office of National Statistics **(18)** indicates that this figure may be around 1.5% although there has been some criticism of the methodology used. In undertaking the Equality Impact Assessment we have assumed that the 5-7% figure is reflected in Greater Nottingham. The main spatial dimension is likely to be in relation to services and facilities which cater for the gay, lesbian and bisexual communities and these are likely to be focused on the City Centre.

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18   Office of National Statistics "Measuring Sexual Identity: An evaluation Report" (September 2010)

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3 Scoping Stage

3.1 Introduction

3.1.1   The purpose of the Scoping Stage is to identify if a specific policy is relevant to equalities. Each policy is discussed in depth to establish the potential it has to impact, positively or negatively, on the six equality strands identified. Identifying a policy as relevant does not automatically mean it will have a negative impact and it may be that some of the policies will, without change, lead to an improvement in equalities. Policies which may have a positive impact are still relevant to equalities and require a full impact assessment to be carried out.

3.1.2   Two sessions were held by a working group of planners from each of the authorities involved. To help guide the discussion, a Scoping Sheet was drafted based on guidance from the Equality & Human Rights Commission and from similar sheets drafted for use by individual authorities. An example sheet can be found at Appendix 2.

3.1.3   For each policy the group asked a series of questions to establish if the policy was relevant. These included:

- What will the policy do?
- Who are the 'customers' of the policy?
- What evidence or information already exists?
- Does the policy relate to an area where there are already identified inequalities?
- Have there been any issues with the way the current policy works?
- Has the policy been identified as important by one of the local authorities?

3.1.4   The relevance of the policy to each of the six identified equality themes was then identified and a conclusion given as to whether a full impact assessment would be required on that policy.

3.1.5   Table 3.1 below is a summary of the Scoping Stage and shows the policies which have been identified as relevant to each of the six equality strands.

3.1.6   While Policy 2 (The Spatial Strategy) has been assessed as relevant to a number of strands it has been decided not to undertake an Impact Assessment of the policy at this time. Policy 2 is based on the East Midlands Regional Plan which informed the strategy that was taken by the Option for Consultation document. Therefore the equality implications would have been assessed through the adoption of the East Midlands Regional Plan process and were unable to be changed through the Option for Consultation. The sites listed in Policy 2 and how they would be developed through the implementation of Policy 3 (Sustainable Urban Extensions) and other thematic policies will subjected to an impact assessment where relevant.

3.1.7   Equally, it was decided not to assess the impact of Policy 3 (Sustainable Urban Extensions). Policy 3 is a starting point for the preparation of subsequent policies, master plans or area action plans which set out how strategic sites will be developed. At this stage there is insufficient detail to undertake a meaningful impact assessment of this policy in relation to individual sites. The impact of the principle of named sites will be assessed through

the site assessment (see section 5) and also through the other thematic policies. The subsequent policies, master plans or area action plans will be subjected to the Equality Impact Assessment process where relevant.

3.1.8 Since the consultation on the Option for Consultation document, changes have been made or are proposed to the planning system that allows the principles of the distribution of growth throughout Greater Nottingham to be re-considered and amended. Changes to the policy will be subjected to a future Equality Impact Assessment at the appropriate time.

3.2 Summary of Scoping Stage

Key

Red – policy is highly relevant to the identified equality strand and will require an Impact Assessment to be carried out

Yellow – policy is of medium relevancy to the identified equality strand and will probably need an Impact Assessment to be carried out

Green – policy is of low relevancy to the identified equality strand and will likely not need an Impact Assessment to be carried out

Policy	Relevance to:							Outcome
	Race	Gender & Gender Identity	Disability	Age	Religion	Sexual Orientation		
Climate Change								Impact Assessment not required Climate change is a global issue and will affect everybody in Greater Nottingham. Issues relating to flooding evacuation plans should be addressed by the Emergency Services.
The Spatial Strategy								Impact Assessment not required Policy acts as a broad over-arching policy. The effects will be more apparent in the individual policies. Need to cross reference

Policy	Assessment
	to other policies and ensure that detailed proposals for areas/sites take account of equalities issues.
The Sustainable Urban Extensions	Impact Assessment not required Policy not thought to require an impact assessment despite being relevant to equality themes. As with Policy 2, need to cross refer to other policies which provide extra detail. Equality Impact Assessments potentially to be done on subsequent Masterplans/ development briefs.
Employment Provision and Economic Development	Impact Assessment required This policy is highly relevant to two of the equality themes and it is considered that this would require a full assessment.
Nottingham City Centre	Impact Assessment required Impact assessment of this policy deemed necessary with a need to tie it in with Policy 6.
The Role of Town and Local Centres	Impact Assessment required Impact Assessment of this Policy deemed necessary with a need to tie it in with Policy 5.

Policy	Assessment	Notes
Regeneration	Impact Assessment not required.	Policy not thought to require an impact assessment despite being relevant to a number of equality strands. There is a need to cross refer to other policies which provide extra detail. Equality Impact Assessments potentially to be done on subsequent Masterplans/ development briefs.
Housing Size, Mix & Choice	Impact Assessment required	Impact Assessment required due to issues being relevant to specific groups and direct impact that the issues the policy looks at will have on people's lives.
Gypsies, Travellers and Travelling Showpeople	Impact Assessment required	Impact assessment required as this policy names an ethnic group in the title and will impact on them directly. Consideration will need to be given to how best to address issues of multiple inequalities (such as elderly gypsies and travellers etc).
Design, the Historic Environment and	Impact Assessment required	Impact Assessment required but need to recognise that delivery will be through use of master plans and planning applications.

Category	Assessment
Enhancing Local Identity	
Local Services and Healthy Lifestyles	Impact Assessment required Impact Assessment required due to equality issues related to access to local services and type of service provided.
Culture, Sport and Tourism	Impact Assessment required Impact assessment required as the policy covers cultural facilities which have importance to a number of equality groups.
Managing Travel Demand	Impact Assessment required Impact assessment required due to importance of public transport access for certain groups.
Transport Infrastructure Priorities	Impact Assessment not required Impact assessment is not required. As the Core Strategy is not the deliverer of these transport schemes it is considered that it is not appropriate for this EqIA to undertake the assessment. Implementation through the spatial planning is considered more

Policy Area	Assessment
	important. The Comprehensive Spending Review currently underway will impact on the proposals listed.
Green Infrastructure, Parks and Open Space	<u>Impact Assessment required</u> Impact Assessment required due to public safety, accessibility and type of facility issues being relevant to equality groups.
Biodiversity	<u>Impact Assessment not required</u> Impact Assessment not required as this policy is designed to protect environmental sites of biodiversity value. Provision of new biodiversity for public access is considered under Policy 15.
Landscape Character	<u>Impact Assessment not required</u> Impact Assessment not required as this is a policy related to the protection of the landscape.
Infrastructure	<u>Impact Assessment not required</u> Impact Assessment not required as this policy is a technical policy with relevance to planners and developers. The infrastructure

Developer Contributions	provided, especially community infrastructure, can be assessed under other policies or through site specific details.
	Impact Assessment not required
	Impact Assessment not required as this policy is a technical policy with relevance to planners and developers. The policy's purpose is to create a mechanism for delivery of infrastructure.

Table 3.1 Summary of Scoping Stage

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4 Impact Assessment Stage

4.1 Introduction

4.1.1 For each of the six equality strands those policies that were deemed to be of high or medium relevancy were assessed for their impact. Identifying a policy as relevant does not automatically mean it will have a negative impact and it may be that many of the policies may, without change, lead to an improvement in equality. It is also important to remember that the purpose of the Equality Impact Assessment is also to identify where opportunities to further promote equalities have not been taken.

4.1.2 The key issues identified for each strand in the Scoping Stage were considered and the way the policy impacts on these issues was assessed. The key issues may be impacted upon by several of the policies in the Option for Consultation document. Personal safety, for example, was identified as a key issue under a number of the equality strands. An important way the planning system can address this is in making areas safer to use by careful design and layout. Policy 10 addresses urban design issues while Policy 3 (Sustainable Urban Extensions) deals with how the large strategic sites are to be developed.

4.1.3 Each equality strand is now considered in turn and a table is included under each strand setting out a summary of the impact assessment, the outcome of the assessment and (if needed) how the policy can be amended to remove potential and actual discrimination or promote equality. These outcomes are then combined into a final Action Plan which sets out what changes should be included in the next stage of preparing the Aligned Core Strategies and who will be responsible for considering their inclusion. The following outcomes identified by the Equality & Human Rights Commission have been used:

1. <u>No major change</u> – the impact assessment demonstrates that the policy is robust and that the evidence shows no potential for discrimination and that all opportunities to promote equality have been taken.
2. <u>Adjust the policy to remove the barriers or better promote equality</u> – the impact assessment demonstrates that the policy can be amended by either removing the elements which cause the discrimination or adding elements to mitigation any negative impact or further promote equality.
3. <u>Continue with the policy despite potential for adverse impact or missed opportunities to promote equality</u> – in some cases there may be other reasons which outweigh the adverse impact on equality caused by the policy. However there is no justification for direct discrimination.
4. <u>Stop and remove the policy</u> – if the policy shows actual or potential unlawful discrimination it must be stopped and removed or changed.

4.1.4 In all cases the outcome should be justified. This will be especially important in relation to policies which are retained despite the potential for adverse impact. Please note that only policies thought to be relevant to that equality strand are included in the summary tables.

4.2 Race

4.2.1   From the Scoping Stage, the following issues were identified as being covered by Option for Consultation policies with relevance to Race:-

- Employment and training opportunities
- Housing needs
- Local services
- Personal safety
- Health and green spaces
- Gypsies, travellers and travelling show people

Employment and training opportunities

4.2.2   Black, Asian and Minority Ethnic communities are more likely to be workless, live in deprived areas and they tend to have lower levels of skills compared to other groups[19]. Discrimination can constrain access to employment opportunities. Out of town employment is often identified as being poorly located for Black, Asian and Minority Ethnic communities who would have to rely on public transport.

4.2.3   Policy 4 looks at employment provision and economic development and promotes Nottingham City as a primary location for new offices. Under the Policy (specifically 4(1), 4(2), 4(3) and 4(4)), new employment growth will be focused on the city and town centres, as part of sustainable urban extensions and in association with higher education establishments and the hospital campuses. This may limit the ability of Black, Asian and Minority Ethnic communities to access new jobs as they may rely on public transport and lack the skills needed for the types of jobs provided.

4.2.4   However, Policy 4(5) and 4(8) seeks to retain employment sites and promote new employment or regeneration sites which provide access to employment opportunities where there are lower skill levels. Providing appropriate training opportunities to assist resident in accessing new jobs will benefit people from Black, Asian and Minority Ethnic communities with lower skills. This is addressed through the provision of training opportunities under Policy 4(7).

Housing needs

4.2.5   Certain ethnic groups have a tradition of larger families with multiple generations living under the same roof. In some cases this can lead to overcrowding and poor housing conditions. The provision of housing of an appropriate size, type and tenure within the existing community will help relieve these issues and also help ensure that the communities are not broken up.

4.2.6   Policy 8 sets out that the mix of housing will be determined on a site by site basis based on criteria which include 'local demographic context and trends' and 'local housing need and demand'. As part of this it will be important to understand the need in the local

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19   Equality & Human Rights Commission "*Triennial Review Executive Summary*" (2010) pp 26 & 30 and Labour Force Survey (2010) quoted on http://www.poverty.org.uk/47/index.shtml?6

area from the Black, Asian and Minority Ethnic communities and the other equality strands. This will be especially important for the sustainable urban extensions and regeneration areas which will be the main focus for growth in Greater Nottingham. Policy 3 and Policy 7 will be followed by later site or area specific plans and it should be ensured that these take account of any relevant ethnicity issues.

Local services

4.2.7   Black, Asian and Minority Ethnic communities may require access to facilities or businesses which provide services specifically for them. This can include community centres or shops. They can also face barriers to accessing other services due to a lack of cultural sensitivity, language barriers or discrimination.

4.2.8   Policy 11(a) and Policy 12(b) both look to focus new local services or cultural facilities of local importance on town and local centres in the first instance. In some cases this may not be appropriate as the community to be served may not have easy access to identified centre. Ensuring that the policy is flexible will be important.

4.2.9   Policy 6(3) looks to make the City centre inclusive and safe. One of the ways the policy sets out to achieve this is by supporting "cultural facilities that appeal to the broadest spectrum of the conurbation's population". This could be read as referring to cultural venues that appeal to the majority of the population, meaning that minority cultures are ignored as they only appeal to a smaller section of the community. It may be better phrased as "a range of cultural facilities to appeal to the full range of the conurbations population".

Personal safety

4.2.10   Personal safety in the public realm and open space is especially important to Black, Asian and Minority Ethnic communities as they can be affected by crime, fear of crime, discrimination, racial abuse and suffer harassment in many forms. Ethnic minorities were the victims of around 25% murders recorded in England and Wales despite forming less than 10% of the population, with just over a half of these victims being Black[20].

4.2.11   One of the main ways in which the planning system can help tackle crime and fear of crime is through ensuring the design and layout of development takes step to reduce the opportunity for crime. This will be especially important in the design of sustainable urban extensions. Policy 3(5) refers to "a high standard of design" and this would include techniques to design out crime and fear of crime. Paragraph 3.3.5 of the supporting text to Policy 3 refers to the use of the Building for Life criteria[21] to assess design. Criterion 15 of the Building for Life scheme asks "are public spaces and pedestrian routes overlooked and do they feel safe?" and through the production of master plans for sites and the Development Management process it will be important to ensure that appropriate design techniques are used.

4.2.12   Policies 5 and 6 relate to the City and town centres. Alongside the general design techniques to reduce crime and fear of crime the City and town centres have issues linked to the night time economy. As mentioned above, one of the aims for the City Centre is to

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20   Equality & Human Rights Commission "*Triennial Review Executive Summary*" (2010) page 10
21   Information from Building for life website

create an "inclusive and safe" environment. Specifically, key night time pedestrian routes will be identified and made safer through encouraging appropriate uses. There are also proposals to consider the regulation of licensed premises, hot food takeaways and taxi ranks. These businesses may be owned and run by members of Black, Asian and Minority Ethnic communities and the impact of regulation and the process that is carried out needs to be considered. Details for the other town centres covered by Policy 6 are less specific due to the number and wide variety of centres covered by Policy 5. Centre specific plans or documents should be assessed to ensure they take account of personal safety issues.

4.2.13 It is important to take account of personal safety issues when considering public transport especially when used after dark. This would be addressed as part of Policy 13(2) in relation to improvements and it may be appropriate to include reference to personal safety in the policy.

Green spaces

4.2.14 People from Black, Asian and Minority Ethnic backgrounds are more likely to have poor access to good quality parks and green spaces and, perhaps partly as a consequence, experience more issues relating to poorer health than others[22]. Parks and green spaces accessible to Black, Asian and Minority Ethnic communities may often be underused as they are of lower quality or are not seen as safe locations due to fear of personal attacks or domination by a particular group[23].

4.2.15 Policy 15 (4) states that parks and open space will be protected from development but exceptions may be made if the park or open space is shown to be underused or undervalued. It should be ensured that positive management of the park or open space has been used to bring it back into active use by the local community prior to it being released for development. Parks and open spaces should be designed to be as inclusive as possible and allow all members of the community to use it safely.

Gypsies, travellers and travelling showpeople

4.2.16 Gypsies, travellers and travelling showpeople face a range of issues that can be addressed through planning. There are identified issues relating to limited access to social facilities, language barriers and lack of appropriate pitch accommodation.

4.2.17 Circular 1/2006 places a requirement on local authorities to undertake Gypsy and Traveller Accommodation Assessments, whilst Circular 4/2007 also requires local authorities to make provision for travelling show people. The assessment identifies a number of pitches to be provided by a local authority and these findings will feed into the local development framework process and inform the planning of site provision and services for gypsies, travellers and travelling showpeople.

4.2.18 Policy 9 deals specifically with gypsies, travellers and travelling showpeople. It sets out the criteria that will be used in identifying sites and sites within the sustainable urban extensions and existing urban area should be considered before other sites. Including pitches

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22 Equality & Human Rights Commission "*Triennial Review Executive Summary*" (2010) page 18
23 Commission for Architecture and the Built Environment "*Community Green: using local spaces to tackle inequality and improve health*" 2010

within sustainable urban extensions may potentially cause issues with the development of the site but it is considered that sustainable urban extensions provide the most appropriate place to ensure that the criteria identified in the Policy are met. The criteria included in the policy are technical in nature and should lead to the provision of appropriate pitches. However, it will be important to ensure that the communities that use the identified sites are consulted about their location and design. This could prove difficult as these groups may be wary of engagement with local authorities and specific consultation events may be needed.

4.2.19   Within gypsies, travellers and travelling showpeople communities other equality strands discussed in this document may apply (for example disability, gender, age and sexuality). It will be important to ensure that these issues are also considered when looking at sites.

Policy	Impact on Race	Outcome of Impact Assessment	Suggested Action
3. The Sustainable Urban Extensions	Depends on details of how specific sites will be developed.	No change to policy	Ensure that detailed policies or plans for specific sites take account of race-related issues.
4. Employment Provision and Economic Development	Positive impact on access to employment and training opportunities	No change to policy	No action.
5. Nottingham City Centre	Positive impact on personal safety. Potentially negative impact on cultural facilities	Amend policy	Amend 5(3) to read "a range of cultural facilities to appeal to the full range of the conurbations population".
6. Role of Town and Local Centres	Depends on details of how specific centres will be developed.	Amend policy	Ensure that detailed policies or plans for specific centres take account of race-related issues.
7. Regeneration	Depends on details of how specific sites will be developed.	No change to policy	Ensure that detailed policies or plans for specific sites take account of race-related issues.

8. Housing Size, Mix and Choice	Positive impact as 'local demographic' information taken into account on site by site basis	No change to policy	No action.
9. Gypsies, Travellers and Travelling Showpeople	Depend on details of how specific sites will be developed.	Amend Policy.	Ensure that detailed policies or plans for specific sites take account of race-related issues. Amend sub-text to policy to ensure that appropriate consultation is undertaken.
10. Design, The Historic Environment and Enhancing Local Identity	Positive impact although this may not reduce discrimination or racial abuse.	No change to policy	No action.
11. Local Services and Healthy Lifestyles	Ensure flexibility in application of policy to allow needs of certain groups to be meet in accessible locations	Amend policy	Amend sub-text to allow flexibility of location if the service is to serve an identified community or catchment area.
12. Culture, Tourism and Sport	Ensure flexibility in application of policy to allow needs of certain groups to be meet in accessible locations	Amend Policy	Amend sub-text to allow flexibility of location if the cultural facility is to serve an identified community or catchment area.
13. Managing Travel Demand	Needs to improve personal safety issues and other issues faced by BAME groups.	Amend Policy	Amend justification to highlight need to address inequality issues in public transport.
15. Green Infrastructure, Parks and Open Space	May lead to negative impact e.g. loss of 'underused' parks or open spaces.	Amend policy	Ensure positive management of parks and other sites prior to being released for other uses.

Table 4.1 Summary of Race Impact Assessment

4.3 Gender

4.3.1   From the scoping stage the following issues were identified as being covered by policies with relevance to Gender and Gender Identity:

- Public transport
- Personal safety
- Access to services and employment
- Housing/design

Public Transport

4.3.2   It is recognised that a higher proportion of women use public transport and do not have access to a car[24] and that women also make more complex journeys than men[25]. This is often related to their role as primary care givers for children meaning they are responsible for the 'school run', need to remain more local to the school and also access other services and facilities. Overall women are more reliant on public transport and it needs to be ensured that new provision of public transport meets their needs in terms of location and routes. There is also an overlap to other issues identified such as accessibility and personal safety.

4.3.3   Policy 3(7) relates to the provision of public transport for the sustainable urban extensions. It seeks to ensure that major new residential development is appropriately provided with access to public transport and that steps are taken to lead to a behavioural change away from the use of private motor vehicles. The provision of accessible public transport in the form of bus or tram stops will improve access and decisions about future routes, destinations and interchange locations should reflect likely journeys to be made. This will require working closely with service providers. There is a potential risk that through encouraging a behavioural change (i.e. those who currently do not use public transport) will lead to provision of journey types which do not match up with the trips women make. It will be important therefore when developing proposals for schemes to ensure that likely destinations will be identified and public transport routes provided.

4.3.4   Policy 5 and Policy 6 are linked and together cover the issues relating to the City Centre and other centres. Policy 5(3) refers to making the City Centre more attractive to pedestrians, cyclists and public transport users through the creation of a high quality environment. Policy 5(4) states that the aim is to make the City Centre "the focus of public transport and sustainable transport". This will be achieved through a variety of measures including Phase 2 of the NET, improvements to Midland Rail Station, improvements to bus stops and the replacement of bus stations. For smaller centres Policy 6(5) refers to improvements in accessibility. Precise details will follow in centre specific documents and plans but are likely to include environmental improvements. Improvements to infrastructure will make public transport journeys to the centres more pleasant and may also improve

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24   National Travel Survey (July 2010) quoted on http://www.poverty.org.uk/75/index.shtml?7
25   McGukin N & Nakamoto Y "Differences in Trip Chaining by Men & Women" (2004)
      http://onlinepubs.trb.org/onlinepubs/conf/CP35v2.pdf

journey times. While the City centre is an important hub for public transport routes this should not be at the expense of orbital routes and a balance will be needed. This will ensure that people do not have to travel into the City Centre only to travel out again.

4.3.5   Public Transport is central to Policy 13 (Managing Travel Demand) which seeks to take a sequential approach to transport by adopting the following approach:

1.   Area wide travel demand management (policies to reduce travel by private car and incentives to use public transport, walking and cycling for appropriate journeys including intensive travel planning).
2.   Improvements to public transport services, and walking and cycling facilities.
3.   Optimisation of existing highway network to prioritise public transport and encourage walking and cycling.
4.   Major highway capacity enhancements to deal with residual car demand.

4.3.6   The clear aim of the policy is to move people away from private vehicles towards public transport. While this may lead to more pressure on the public transport infrastructure from the increase in users it may also lead to an improved service through more frequent services and a greater range of routes. As mentioned above women are more often the primary care giver to children and ensuring that public transport is accessible to those with pushchairs is important. The text of the policy refers to having "regard to the needs of people with mobility difficulties" and this could include parents with children and pregnant women. Policy 13(2) refers to "Improvements to public transport services" and it may be appropriate to clarify that these improvements could include those discussed in this section.

4.3.7   Personal safety has been acknowledged as an important issue for women and for transgender people who are especially vulnerable to harassment[26]. It is important to take account of personal safety issues when considering public transport especially when used after dark. This would be addressed as part of Policy 13(2) in relation to improvements and it may be appropriate to include reference to personal safety in the policy.

Personal Safety

4.3.8   Personal safety issues are especially important to women and transgender people. These groups are disproportionately affected by crime and fear of crime and suffer harassment in many forms[27]. One of the main ways in which the planning system can help tackle crime and fear of crime is through ensuring the design and layout of development takes step to reduce the opportunity for crime. This will be especially important in the design of sustainable urban extensions. Policy 3(5) refers to "a high standard of design" and this would include techniques to design out crime and fear of crime. Paragraph 3.3.5 of the supporting text to Policy 3 refers to the use of the Building for Life criteria to assess design. Criterion 15 asks "Are public spaces and pedestrian routes overlooked and do they feel safe?" and through the production of master plans for sites and the Development Management process it will be important to ensure that appropriate design techniques are used.

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26   Carter M "Gender differences in Experience with and Fear of Crime in relation to Public Transport" (2004)
        http://onlinepubs.trb.org/onlinepubs/conf/CP35v2.pdf
27   Equality & Human Rights Commission "Triennial Review Executive Summary" (2010) page 14

4.3.9 Policies 5 and 6 relate to the City and town centres. Alongside the general design techniques to reduce crime and fear of crime the City and town centres have issues linked to the night time economy. As mentioned above one of the aims for the City centre is to create an "inclusive and safe" environment. Specifically, key night time pedestrian routes will be identified and made safer through encouraging appropriate uses. There are also proposals to consider the regulation of licensed premises, hot food takeaways and taxi ranks. Details for the other town centres covered by Policy 6 are less specific due to the number and wide variety of centres covered by Policy 5. Centre specific plans or documents should be assessed to ensure they take account of personal safety issues.

4.3.10 Policy 10 specifically deals with personal safety issues at a number of points. Bullet point 4 refers to the creation of a "safe, inclusive and attractive" environment. Bullet point 6 refers explicitly to crime and fear of crime and reducing these through a variety of measures including active frontages and suitable enclosure treatments. The wording of this section of the policy and the supporting text appear to refer mainly to property theft as opposed to crimes against the person. It may be appropriate to include additional supporting text about the way in which the layout of a development can be designed to avoid dark alleyways and the like. Again, the supporting text makes reference to the Building for Life standard which includes a criterion on overlooking and safety.

4.3.11 As addressed above, personal safety on public transport is an important issue. In addition to this evidence suggests that women are also more likely to be involved in accidents when cycling despite cycling less than men. It has been suggested that this may be due to women having less confidence than men when cycling, resulting in the adoption of a less positive position in the road[28]. Policy 13(3) relates to improvements to the highway to encourage cycling. Alongside this it may also be appropriate to discuss in the supporting text other ways to encourage cycling and raise confidence amongst female cyclists.

4.3.12 Recent research has found that women are less likely to use green infrastructure, especially parks, than men[29]. A possible reason for this is crime and fear of crime. Parks which have an enclosed nature, perhaps due to the presence of woodland, may be intimidating places especially after dark and during winter. It will be important to ensure that the design and layout of parks includes areas which can be used safely and without fear by all. Policy 15 and Policy 3(8) relate to green infrastructure and parks but do not make any reference to improving access for women. Consideration should be given to the best way to include discussion of matters beyond the provision on green infrastructure perhaps through the inclusion of criteria of the development of parks and open spaces.

Accessibility of Services and Employment

4.3.13 As discussed above, public transport is an issue that has impact on gender and gender identity issues. While accessibility of services and employment is linked to public transport provision, if the service or employment opportunity is at the end of the public transport route it could be too far to be accessible. Out of town employment is often identified as being poorly located for women who have to make more complex trips and often rely on public

28   Bell S "Are women cyclists more in danger than men?" (October 2009)
      http://news.bbc.co.uk/1/hi/magazine/8296971.stm
29   Richardson EA & Mitchell R "Gender differences in relationships between urban green space and health in the United Kingdom" (2010) Social Science & Medicine 71(3):568-75

transport. However, providing employment opportunities solely on non-out of town locations would not be practical and the Option for Consultation document looks to ensure that a balanced range of employment sites is available. This is carried forward in Policy 2(2) and Policy 2(3).

4.3.14 On the whole women are overrepresented in certain types of lower skilled jobs[30] although this may be changing as girls outperform boys at GCSE level[31]. While improving skills is an important issue that can be addressed through the provision of local training opportunities (see Policy 4(7)) it is also important to provide access to a range of jobs including lower skilled work especially in deprived areas (see Policy 4(8)).

4.3.15 Policy 4(1) Policy 4(2) both look to focus new office development within the City centre and town centres. This would improve accessibility, especially in connection with Policy 11 which aims to locate facilities within the centres which would reduce the complexity of journeys made. As women are often the primary care giver for children, access to childcare facilities is important. Paragraph 3.11.8 includes nurseries as uses that should be located within centres or in accessible locations and it may be appropriate to include discussion of facilities such as childcare or health facilities on strategic employment sites.

4.3.16 Policy 3 also includes elements which seek to ensure that employment, training opportunities, facilities and services are accessible within new strategic developments (see Policy 3(2), 3(3) and 3(4)). The provision of these will take account of the local context of the site through ensuring that new provision is made serving more than the new development or that existing facilities and services are enhanced or expanded. The impact of this will be that major new development and surrounding areas will be better served.

Housing/Design

4.3.17 As discussed above, areas can be designed to reduce crime and the fear of crime. By ensuring that streets are well lit and have natural surveillance through being well used or overlooked it is possible to reduce opportunities for crime and make people feel safer. Alongside this, women often face other obstacles navigating the environment in their role as primary care giver for children. Policy 10 bullet point 4 refers to improving the "permeability, legibility and accessibility" of the public realm. This could include ensuring that the use and design of features such as kerbs, steps, ramps and other features which can cause problems for those using pushchairs are carefully considered. Again, this would be assessed on a site by site basis through the Development Management process and based on the principles and techniques in Manual for Streets as discussed in paragraph 3.10.4.

4.3.18 The design of homes should also be considered, although this falls within Policy 8 which addresses housing type and requires that new dwellings should provide adequate living space. The precise mix of housing will be determined on a site by site basis based on criteria which includes 'local demographic context and trends' and 'local housing need and demand'. As part of this it will be important to understand the needs of different genders in the local area.

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30   Equality & Human Rights Commission "Triennial Review Executive Summary" (2010) page 26
31   BBC News (25.08.2010) http://www.bbc.co.uk/news/education-11074117

4.3.19 Policy 8 also requires that a proportion of homes are provided to meet 'lifetime homes' standards[32] which are aimed at ensuring that older people are able to stay in their own home for longer. This includes ensuring that homes can be adapted to suit different needs and doors and rooms are large enough for wheelchairs. Lifetime homes are therefore also likely to have a beneficial impact for those responsible for childcare. Providing a percentage of new homes to this standard will only have a limited impact and consideration should be given to ensuring all new dwellings are suitably designed. A larger percentage would ensure that more people have access to a house that is adaptable to their needs. However, it is important to consider the financial viability of housing sites to deliver an increase proportion of life time homes along side other requirements.

4.3.20 Policy 8 also sets out the approach to affordable housing. Nationally there are proportionally more women in social housing especially as single mothers due to factors such as lower wages and limited employment opportunities[33]. Ensuring a good supply of affordable housing will have a positive impact for women by ensuring that there is less competition for appropriate dwellings. However, there is a risk that the current economic climate will limit supply in the short term.

4.3.21 For housing type, design and tenure, details will be included in the site specific policies which will follow on from Policy 3. These policies and other site specific plans will also need to be assessed from an equality view point at the appropriate time.

Policy	Impact on Gender & Gender Identity	Outcome of Impact Assessment	Suggested Action
Policy 3 – Sustainable Urban Extensions	Impacts on a range of issues. Precise details of how sites will developed it is to be included in subsequent site specific policies within the Core Strategy or other local development documents. Plans will need to have regard to other policies of the Core Strategy.	No change to policy	Ensure that detailed policies or plans for specific sites take account of gender and transgender Issues.

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32   http://www.lifetimehomes.org.uk/
33   Office of National Statistics "National Housing Statistics Focus on Gender" (2006)
      http://www.statistics.gov.uk/cci/nugget.asp?id=433

Policy 4 – Employment Provision and Economic Development	Positive impact on access to employment and training opportunities – balance distribution of employment. Employment opportunities within centres will ensure linked access to other services and facilities. Policy for strategic employment sites could discuss associated services.	Amend policy	Amend policy to ensure that associated facilities (such as childcare) can be provided alongside strategic employment sites.
Policy 5 – Nottingham City Centre	Positive impact on personal safety and access to services and employment. Role of the City Centre as a hub should not be at expense of orbital routes around the conurbation.	No change. Discussion of role of City Centre as a hub will be addressed in Policy 13.	No change.
Policy 6 – The Role of Town and Local Centres	Positive impact on personal safety and access to services and employment. Details will be included in centre specific local development documents.	Amend policy	Ensure that detailed policies or plans for specific centres take account of gender and transgender Issues
Policy 8 - Housing Size, Mix and Choice	Positive impact on amount of affordable housing although delivery issues due to economic climate. Only providing a proportion of 'life time' homes may not sufficiently promote equalities.	Amend policy	Amend policy to lead to increase provision of life time homes as would have wider benefits.

Policy 10 – Design, the Historic Environment and Enhancing Local Identity	Could more clearly identify that crime and fear of crime are issues which are important in relation to women and transgender people.	Amend policy	Include reference in bullet point 6 (or supporting text?) regarding avoidance of unlit alleys, corners and also subways.
Policy 11 – Local Services and Healthy Lifestyles	Should improve access to facilities.	No change	No changes
Policy 13 – Managing Travel Demand	May lead to extra pressure on public transport but should also increase frequency and routes. Needs to have regards to specific issues faced by women.	Amend policy	Amend justification to highlight need to address inequality issues in public transport.
Policy 15 – Green Infrastructure	Will lead to improved provision of green infrastructure but needs to ensure that it is used by all members of the community.	Amend Policy	Include criteria for new green infrastructure – include criterion on safety.

Table 4.2 Summary of Gender Impact Assessment

4.4 Disability

4.4.1   The following issues were identified during the scoping exercise of the Core Strategy as being of particular relevance in relation to the strand of disability:

- Public transport
- Access to services, facilities and employment opportunities
- Housing choice and design
- Personal safety

4.4.2   Under the social model of disability, most day-to-day problems that disabled people face are caused by a society designed to meet the needs of non-disabled people. In discussing transport issues here the focus should therefore be on understanding any economic, environmental, social and cultural barriers which may exist, hindering the widest use of services and social, work and leisure opportunities

Public Transport

4.4.3   Evidence suggests that a significantly higher percentage of people with disabilities do not have a car within their households in comparison with the wider population[34]. This serves to emphasise the important role that a convenient and accessible public transport network could play in contributing towards independent travel opportunities and fair access to services and facilities.

4.4.4   The consideration of public transport issues and how they affect people with disabilities should recognise the 'chain' nature of travel, where a variety of modes of travel may be utilised within a single journey from A to B. It is therefore important to ensure that public transport links within a chain are accessible, ensuring smooth and convenient transition throughout a journey and as few in number as possible. Clearly, new public transport provision should also meet the route and location needs of disabled people.

4.4.5   Policy 2(The Spatial Strategy) of the Option for Consultation document, sets out the proposed geographical locations for major new residential, employment, retail, social, leisure and cultural developments. The policy seeks to direct these towards the most sustainable locations, within city and town centres, sustainable urban extensions and identified regeneration zones. This general principle of concentration of development in sustainable locations, where existing public transport facilities can be utilised and improved, is supportive of the aim of providing inclusive public transport opportunities for the benefit of all.

4.4.6   Policies 3(7), 5(3), 5(4) of the Option for Consultation document have regard to the provision of public transport for sustainable urban extensions, the aspiration to make the City centre more attractive for public transport users by the creation of a high quality environment and making the City centre the focus for public transport, whilst Policy 6(5) refers to improvements in accessibility in relation to the vitality and viability of sustainable centres.

4.4.7   Public transport is central to Policy 13. The final paragraph of the policy refers to having regard to the needs of people with mobility difficulties. The Policy seeks to take a sequential approach to transport by adopting travel demand management measures, improvements to public transport, walking and cycling, optimisation of the existing highway network as well as highway capacity enhancements. Each of these policies is supportive of an accessible public transport system.

4.4.8   With reference to Policy 3(7) and Policy 13, which have regard to the aspiration for modal shift away from private car usage, it should be acknowledged that the most common transportation mode for people with disabilities is a car driven by someone else[35] and that this transport option is likely to remain an important, and in certain cases essential element of transport choice for some people with disabilities. Recognition of this could be made within the Aligned Core Strategies and appropriate provision for such car usage should incorporated within public transport proposals.

34   DPTAC "*Attitudes of Disabled People to Public Transport*" (2001)
       http://dptac.independent.gov.uk/pubs/research/apt/03.htm
35   DPTAC "*Attitudes of Disabled People to Public Transport*" (2001)
       http://dptac.independent.gov.uk/pubs/research/apt/03.htm

Access to services and employment opportunities

4.4.9   It has been reported that disabled people are significantly less likely to participate in cultural, leisure and sporting activities than the wider population, with approximately 50% of all disabled people in the UK experiencing difficulty in going to the cinema, eating out or going shopping [36].

4.4.10   Structural access issues relating to buildings, for example the appropriate provision of ramps or the need for suitable doors to accessible entrances, are addressed by legislation under the Building Regulations. Part M of these regulations requires the inclusive provision of ease of access to and circulation within all buildings, together with requirements for facilities for disabled people.

4.4.11   However, access to services is not just about physical details, but is also about making services easier to use for everybody. Alongside public transport requirements mentioned above and structural design access measures covered by the Building Regulations, it is equally important to ensure that all new developments are appropriately located. Sites for employment, retail, social, cultural and educational and training activities should be situated at locations that are easily accessible for all members of the community. Additionally, the provision of adequate information about all these activities should also be readily available.

4.4.12   Research suggests that disabled people experience significant difficulties accessing employment opportunities and have difficulty sustaining work as a result of physical and social barriers. Disabled people are twice as likely as non-disabled people not to be in education or training and have no qualifications[37]. The opportunity to access sites for education, skills and training that maximise employment opportunities is undoubtedly a significant factor to be taken into account. Improving skills is an issue discussed by the provision of local training opportunities (see Policy 4(7)). It is also important to provide access to a range of jobs including lower skilled work especially in deprived areas (see Policy 4(8)). Layout and design issues relating to centres of training and areas of employment should be addressed through Development Management.

4.4.13   Policy 3 also includes elements which seek to ensure that employment and training opportunities and facilities and services are accessible within new developments (e.g. Policy 3(2), 3(3) and 3(4)). The provision of these will take account of the local context of the site through ensuring that new provision is made serving more than the new development or that existing facilities and services are enhanced or expanded. The impact of this will be that major new development and surrounding areas will be better served.

4.4.14   Mention has been made to Policy 2 in reference to public transport. The aim of that policy being to focus major new residential, employment, retail, social, leisure and cultural developments within sustainable locations. This will assist towards removing barriers to fair access to services, facilities and employment opportunities for people with disabilities. The focus of Policy 4(1) and Policy 4(2) is to locate new office development within the City centre and town centres.

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36   http://www.disabilityaction.org/business-services/access/key-facts-about-access/
37   Labour Force Survey (May 2009)

4.4.15   Policy 11 and Policy 12 support the location of new, extended or improved community facilities. Cultural and tourist facilities within accessible locations where support for a range of sustainable transport modes improving the accessibility of facilities. Policy 11 also supports the co-location of facilities which will allow linked trips. The outcome of Policy 11 will be to lead to a concentration of facilities in centres or other accessible locations reducing the need for multiple journeys.

4.4.16   Parks and open spaces are addressed by Policy 15. The aim of the policy is to make parks and open spaces more accessible and used by members of the public. As part of this it will be important to understand the needs of disabled people in terms of access and the type of facilities provided.

Housing/Design

4.4.17   The process of housing provision should incorporate the needs of specific groups, making sufficient and adequate provision for people with disabilities.

4.4.18   Surveys have identified that many people who require accessible or adapted accommodation may reside in unsuitable housing [38] The choices available to people requiring accessible or adapted housing are often severely restricted, with demand for appropriate housing outstripping supply. Nationally there are large numbers of disabled people living in social housing[39].

4.4.19   Policy 8 relates to housing size mix and choice and sets out the approach to affordable housing. Given that the rate of employment and income of disabled people is below that of the wider population, ensuring a good supply of affordable housing will have a positive impact for people with disabilities by there being is less competition for houses. Under Policy 8 the mix of housing will be determined on a site by site basis based on criteria which includes 'local demographic context and trends' and 'local housing need and demand'. As part of this it will be important to understand the need in the wider local authority areas from people with disabilities alongside other equality groups.

4.4.20   Policy 8 also requires that a proportion of homes are provided to meet 'lifetime homes' standards which are aimed at ensuring that older people are able to stay in their own home for longer. This includes ensuring that homes can be adapted to suit different needs and that door widths and rooms are large enough for wheelchairs. A survey of English housing in 2007/08 identified that 1 in 5 disabled people requiring adaptations to their home believe that their accommodation is not suitable [40]. Housing type, design and tenure details will be addressed in site specific policies which will follow on from Policy 3.1 which refers to Area Action Plans, Supplementary Planning Documents or Master Plans for sustainable urban extensions to provide for a mix of housing type, size and tenure. Policy 8(1) stipulates that an unspecified proportion of new homes will be required to meet Lifetime Homes standards[41].

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38   Department of Communities and Local Government "*Survey of English Housing 2007/08*" (January 2009).

39   Department of Communities and Local Government "*Survey of English Housing 2007/08*" (January 2009) quoted on http://england.shelter.org.uk/housing_issues/Improving_social_housing/who_gets_social_housing

40   Survey of English Housing 2007/08 quoted on http://www.officefordisability.gov.uk/disability-statistics-and-research/disability-facts-and-figures.php#ho

41   http://www.lifetimehomes.org.uk/

Given the scale of requirement and significance of the issue, it may be appropriate to give consideration to greater prominence to the issue of housing adaptability within the wording of Policy 8.

4.4.21   The layout and design of neighbourhoods can also impact on people with disabilities. For example pedestrian crossings have been altered over the years to make them easier to use and similar principles can be applied to other elements of the built environment. A recent report by the Commission for Architecture and the Built Environment and the Royal College of Art: Helen Hamlyn Centre[42] shows how the design of street can make using them easier for people with visual impairments. The report also shows how different levels of impairment (and by extension how different types of disability) require different and often contradictory techniques. For example wide feature less paths may be disorientating for long cane uses but give those with guide dogs the space to avoid other pedestrians. In designing streets it will be important to balance these and other competing demands.

Personal Safety

4.4.22   Personal safety is an issue affecting all members of society, including people with disabilities, where the use of aids such as canes or wheelchairs could single people out as potentially vulnerable leading to disabled people being more likely to be the victim of crime[43]. A number of studies have investigated levels of harassment and victimisation amongst disabled people and it has been reported that a higher percentage of people with a learning disability have experienced harassment and a higher proportion of disabled people fear being alone after dark than non-disabled people. Anti social behaviour is typically most likely to occur in public places, such as in the street or park, in shops or on public transport.

4.4.23   The appropriate layout and design of developments can make a significant impact in creating safe and secure environments for all and help to minimise crime and the fear of crime. Good lighting, for example, can enhance a feeling of personal safety. It is also important for people with disabilities to be able to identify routes by having access to signage information and be aware of obstacles. Policy 3(5) refers to "a high standard of design" and this would include techniques to design out crime and fear of crime. Policies 5 and 6 relate to the City and town centres. City and town centres have issues linked to the night time economy. One of the aims for the City centre is the creation of an "inclusive and safe" environment. The direction of appropriate uses to key night time pedestrian routes will, alongside physical design measures, contribute towards making these routes safer. There are also proposals to consider the regulation of licensed premises, hot food takeaways and taxi ranks. Details for the other town centres covered by Policy 6 are less specific due to the number and wide variety of centres covered by Policy 5. Centre specific plans or documents should be assessed to ensure they take account of personal safety issues.

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42   Atkin R " *Sight Line: Designing Better Streets for People with Low Vision*" (2010)
        http://www.hhc.rca.ac.uk/CMS/files/sightline.pdf
43   Home Office "*British Crime Survey 2008/09*" (July 2009)

4.4.24   Personal safety issues are also considered under Policy 10, which relates to design, the historic environment and the enhancement of local identity. The desire to create a safe, inclusive and attractive environment is expressed by achieving a reduction in crime as well as fear of crime, including by improving the permeability, legibility and access of the public realm and encouragement of active frontages, creating passive surveillance of public corridors.

Policy	Impact on Disability	Outcome of Impact Assessment	Suggested Action
Policy 3 – Sustainable Urban Extensions	Impacts on a range of issues. Precise details of how sites will be developed is to be included in subsequent site specific policies within the Core Strategy or other local development documents. Plans will need to have regard to other policies of the Core Strategy.	No change to Policy	Ensure that detailed policies or plans for specific sites take account of disability issues
Policy 4 – Employment Provision and Economic Development	Positive impact on access to employment and training opportunities – balance distribution of employment. Employment opportunities within centres will ensure linked access to other services and facilities. Policy for strategic employment sites	No change to policy	No changes.
Policy 5 – Nottingham City Centre	Positive impact on personal safety and access to services and employment. Role of the City centre.	No change to policy	No changes.

Policy 6 – The Role of Town and Local Centres	Positive impact on personal safety and access to services and employment. Details will be included in centre specific local development documents.	Amend policy	Ensure that detailed policies or plans for specific centres take account of disability issues
Policy 8 - Housing Size, Mix and Choice	Positive impact on amount of affordable housing. Only providing a proportion of 'life time' homes may not sufficiently promote equalities.	Amend policy	Amend policy or justification to lead to give a greater prominence to housing adaptability.
Policy 9 – Gypsies, Travellers and Travelling Showpeople	Positive impact access on access to services and facilities.	No change to policy	No changes.
Policy 10 – Design, the Historic Environment and Enhancing Local Identity	Positive impact on access to the historic environment by improvements to the public realm.	No change to policy	No changes.
Policy 11 – Local Services and Healthy Lifestyles	Should improve access to services.	No change to policy	No changes.
Policy 12 – Culture Tourism and Sport	Positive impact on access to facilities.	No change to policy	No changes.
Policy 13 – Managing Travel Demand	Should increase frequency and routes. Perhaps needs to discuss the specific requirement for cur use by people with disabilities in the context of modal shift.	Amend policy	Consider amending policy or its supporting text to acknowledge the specific need for car use by people with disabilities.

Policy 15 – Green Infrastructure	Will lead to improved provision of green infrastructure but needs to ensure that it is used by all members of the community.	Amend policy	Include criteria for new green infrastructure – include criterion on safety.

Table 4.3 Summary of Disability Impact Assessment

4.5 Age

4.5.1   From the scoping stage the following issues were identified as being covered by policies with relevance to age:

- Provision of affordable and decent housing
- Access to services/facilities
- Personal safety

Provision of affordable and decent housing

4.5.2   In relation to age, the Core Strategy provides for housing of an appropriate mix of sizes, types and tenures which will be suitable for people of different ages. This is ensured through Policy 8. The affordability of housing was identified through the scoping stage as a particular concern to many young people[44] and as such the increased provision of affordable housing, which the Aligned Core Strategies seeks to ensure, will help those in housing need.

4.5.3   Policy 8 also ensures that new homes are adaptable to the life time of the occupants by requiring the proportion of new homes to meet Lifetime Homes standards. Coupled with the provision of an appropriate mix of units e.g. bungalows, the needs of the more elderly population of Greater Nottingham has been considered.

4.5.4   However, it is recommended that consideration be given to amend Policy 8 to specify and quantify the proportion of lifetime homes to be provided as part of new residential development.

Access to services/facilities

4.5.5   The Scoping Stage revealed the significant effect that the distribution of new development could have on certain sections of the population. It was acknowledged that older people and younger people do not have as much access to private cars, relying on other modes of transport to access jobs, services and facilities. Indeed, access to recreation, leisure provision, employment, public transport, safety, accessibility and community facilities will also have a particular relevance to people of all ages across the conurbation but particularly to young and old people. Policy 11 demonstrates how community facilities should

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44   The Guardian (21.04.2010) http://www.guardian.co.uk/money/2010/apr/21/first-time-buyers-20-year-low

be located in the city centre, town centres and locations which are accessible by a range of sustainable transport modes. Indeed, the theme of promoting sustainable patterns of development is evident throughout the Core Strategy.

4.5.6 Furthermore growth is promoted and Policy 3(3) ensures that this will provide employment and support existing local facilities including retail, education, leisure, social, cultural, faith and health facilities or, where necessary, provide new facilities to meet local need. It is recommended that the emphasis on promoting such sustainable patterns of development is maintained in the Aligned Core Strategies.

4.5.7 Of particular importance to younger and older people is their ability to access good quality parks and open spaces e.g. for sport, walks and general recreation with Policy 15 'Green Infrastructure, Parks and Open Spaces' directly assisting in this respect. This policy notably protects and improves access to existing provision whilst also ensuring contributions are made to such assets through new development as part of developing a strategic green infrastructure network.

4.5.8 An important element of access is the extent to which streets and areas are navigable to people. Young and old alike can face difficulties if layout, materials and features of an area are not sensitive to their needs. High kerbs, for example, may not be suitable for older people, especially those with mobility problems, whilst road crossings need to be located to take account of children. The concept of Lifetime Homes can also be applied to whole neighbourhoods[45] to ensure that design and layout meets the needs of all residents. Policy 11 (bullets 4 and 5) refer to improving permeability, legibility and accessibility and also be adaptable to social conditions although it does not explicitly refer to Lifetime Neighbourhoods.

Personal Safety

4.5.9 The Scoping Stage also revealed the potential to increase or exacerbate issues relating to crime and the fear of crime in particular in relation to younger and older people. Firstly the emphasis on promoting development in city centres and town centres was highlighted as having the potential to lead to divisions between the aforementioned groups with regard to the expansion of the night time economy. Indeed, with potentially higher numbers of younger people in these centres at night time, older people may feel unable to participate due to their fear of alcohol/drug related disturbance. However, the development of centres in Greater Nottingham is crucial in delivering wider economic and social gains and this issue unfortunately accompanies this focus, it can be managed through education and enhanced policing, although this is beyond the control of the Aligned Core Strategies outside of the creation of a safe and inclusive City centre as identified by Policy 5(3). Plans for other centres will also need to take the opportunity to increase safety especially at night.

4.5.10 Furthermore, as young and older people are more likely to use public transport due to a lack of car ownership, divisions could also be increased. There is a perception that there is a level of anti-social behaviour with young people using public transport which poses a barrier to older people who wish to use these services. Although the Aligned Core Strategies promote the use of public transport through Policy 13, the imperative will be with the service providers to tackle the issue of anti-social behaviour.

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45   http://www.lifetimehomes.org.uk/pages/lifetime-neighbourhoods.html

Policy	Impact on Age	Outcome of Impact Assessment	Suggested Action
Policy 3 – Sustainable Urban Extensions	Positive impact with new affordable and decent homes being provided on sustainable urban extensions to promote equality. This will include the provision of Lifetime homes. Although precise details of how sites will developed to be included in subsequent site specific policies within the Core Strategy or other local development documents. Plans will need to have regard to other policies of the Core Strategy.	No change to Policy	Ensure that detailed policies or plans for specific sites take account of age issues.
Policy 5 – Nottingham City Centre	Positive impact on personal safety and access to services and employment. Role of the City Centre as a hub should not be at expense of other centres across the conurbation. The support for a night time economy potentially causes divisions between younger and older generations.	No change	No changes.

	Positive design/layout of developments will help decrease crime and the fear of crime. Support for family orientated leisure and facilities for young people.		
Policy 6 – The Role of the Town and Local Centres	Positive impact on personal safety and access to services and employment. Details will be included in centre specific local development documents. The support for a night time economy potentially causes divisions between younger and older generations. Potential harassment issues with regards to alcohol related anti-social behaviour and Positive design/layout of developments will help decrease crime and the fear of crime. Access to local services.	No change	Ensure that detailed policies or plans for specific sites take account of age issues.
Policy 8 - Housing Size, Mix and Choice	New affordable and decent homes to be provided will promote equality. This will	Amend policy	Amend the policy or justification to deliver a higher proportion of lifetime homes.

	include the provision of Lifetime homes (specify proportion). Positive impact on amount of affordable housing although delivery issues due to economic climate. A mix of dwelling types will be encouraged including flats for younger people, family housing, lifetime homes and will have a positive impact on access to housing for older and younger generations.		
Policy 10 – Design, the Historic Environment and Enhancing Local Identity	Could more clearly identify that crime and fear of crime are issues which are important in relation to older people. Positive impact on layout of areas but could refer to Lifetime Neighbourhoods.	Amend policy	Amend policy to include reference to Lifetime Neighbourhoods Include reference in the sub text to personal safety/fear of crime in relation to older people.
Policy 11 – Local Services and Healthy Lifestyles	Should improve access to facilities Access to services in rural areas for older groups.	No change	No changes.
Policy 13 – Managing Travel Demand	May lead to extra pressure on public transport but should also increase frequency and	Amend policy	Amend justification to highlight need to address inequality issues in public transport.

	routes. Need to have regard to specific issues faced by older people. Young and older people more likely to use public transport. Perception of anti-social behaviour with young people using public transport.		
Policy 15 – Green Infrastructure	Will lead to an increase in accessible green infrastructure and also improve quality.	No change	No changes.

Table 4.4 Summary of Age Impact Assessment

4.6 Religion

4.6.1   From the scoping stage the following significant issue were identified as being covered by policies with relevance to Religious identity:

- Local services
- Personal safety
- Design and tourism

Local Services

4.6.2   Religious groups frequently require places of worship as local as possible to worshippers. The provision of new community infrastructure including places of worship is addressed for the sustainable urban extensions in Policy 3(7) and for smaller development in Policy 11. The regeneration of areas discussed in Policy 7 may impact on religious communities and buildings. Consultation with religious groups should be undertaken to assess the need for new religious facilities and, where possible and appropriate, the sharing or co-location of facilities should be explored and encouraged to improve community cohesion. Early engagement with religious and community groups may also help lead to sensitive regeneration.

4.6.3   Places of worship, religious instruction and church halls are in the D1 Use Class[46] meaning there is no permitted change without planning permission. They have their own opening arrangements and the relationship with neighbours and the neighbourhood needs

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46   http://www.sandersonweatherall.com/downloads/Use_Classes.pdf?PHPSESSID=6502bac61226843f33f4b1c37bd8bc5b

consideration when proposals are assessed. Mosque opening hours during Ramadan, for example, may be more extensive than at other times. Policy 11 addresses new community facilities including places of worship and associated uses but does not address matters such as opening arrangements and access.

4.6.4 Religious groups may be growing and require larger and modern facilities. Policy 11 looks to locate new community facilities in town centres where appropriate. The need for places of worship, associated uses and also religious schools to be close to the community they serve means that there may not be a town centre near enough to allow this. In some cases, religious groups have begun using buildings in employment areas as a place of worship leading to conflict with Policy 4(8) which looks to retain viable employment sites for business use. The 'dual use' of buildings may be possible and this could be acceptable provided the employment use of the site is not compromised.

Personal Safety

4.6.5 The practise of some religions includes outward displays of faith which may make individuals more vulnerable to harassment. As identified in relation to other equality themes, areas can be designed to reduce the opportunity for crime and to make people feel safer in them. This principle is included in a number of policies in the Option for Consultation document including Policy 3 (in relation to sustainable urban extensions) and Policy 10 for other sites. A key area for this issue will be in the City and town centres where a wide range of people often interact. Policy 5(3) and 5(5) look to ensure a safe and inclusive environment in the City centre. Policy 6 does not include reference to designing out crime and creating safe and inclusive environments as specific policies for centres will be included in other documents.

Design & Tourism

4.6.6 Religion can have a significant effect on the character of places through the role places of worship have as landmarks and important features in the street scene and through the less tangible creation of place. Policy 10 looks to ensure a "strong sense of place" through building on the cultural characteristics.

4.6.7 In some cases, for example The Church of St Mary the Virgin and St Barnabas' Cathedral, places of worship are also tourist destinations. Policy 12(d) refers to the protection and further development of cultural and tourist facilities "where appropriate". In these cases development for tourist purposes needs to take account of the religious purpose of the building and ensure that any development is sensitive to it.

Policy	Impact on Religion	Outcome of Impact Assessment	Suggested Action
Policy 3 – Sustainable Urban Extensions	Impact on provision of community infrastructure but also design. Precise details of how sites will be developed are to be included in subsequent	No change to policy	Ensure that detailed policies or plans for specific sites take account of religious issues.

	site specific policies within the Core Strategy or other local development documents. Plans will need to have regard to other policies of the Core Strategy.		
Policy 4 – Employment Provision and Economic Development	Implementation of 4(8) may have implications for religious organisations seeking premises. Policy for strategic employment sites could discuss associated services and dual use of facilities.	Include reference to religion in supporting text	Amend policy to ensure that associated facilities (such as places of worship) can be provided alongside strategic employment sites where it does not compromise employment purpose of the site.
Policy 5 – Nottingham City Centre	Positive impact on personal safety and access to services.	No change	No changes.
Policy 6 – The Role of Town and Local Centres	Positive impact on personal safety and access to services. Details will be included in centre specific local development documents.	No change	Ensure that detailed policies or plans for specific centres take account of religious issues
Policy 7 - Regeneration	Potential negative impact on places of worship or other religious buildings and also on specific groups living in or near regeneration areas.	Amend policy	Amend policy to ensure early engagement with any local religious groups affected by regeneration.
Policy 10 – Design, the Historic Environment and Enhancing Local Identity	The protection of important landmark places of worship and also the protection of areas with religious character is important but specifically recognised in the policy.	Amend policy to acknowledge the influence of religion on character of place	Consider criteria for impact of religious character on place, including building types, design and views.

Policy 11 – Local Services and Healthy Lifestyles	Supports provision of religious facilities but may need to be more flexible in terms of opening hours and location	Amend policy	Add sub-text to ensure flexibility to reflect specific circumstances of religious buildings. Consider adding religious instruction and church halls to the list of community facilities as per D1 of the Use Classes Order
Policy 12 - Culture	Potentially negative impact on places of worship that are also tourist destinations. The policy should also acknowledge the importance of religion as a part of many people's culture	Amend policy	Amend policy to ensure sensitive development of places of worship which are also tourist destinations. Include reference to religion importance to culture in the sub text.

Table 4.5 Summary of Religion and Belief Impact Assessment

4.7 Sexual Orientation

4.7.1   From the scoping stage the following issues were identified as being covered by policies with relevance to sexual orientation:

- Public transport
- Personal safety

4.7.2   Lesbians, gay men, bisexuals and transgender people can face hate crime and harassment in the public realm. Issues of homophobia and trans-phobia are forms of a discrimination that can impact on the way that this group interacts with the spatial environment.

Public Transport

4.7.3   Personal safety on public transport is often an issue for lesbians, gay men, bisexuals and transgender people, particularly for those who are open about their sexuality.

4.7.4   Public Transport is central to Policy 13 (Managing Travel Demand) which seeks to take a sequential approach to transport by adopting the following approach:

1. Area wide travel demand management (policies to reduce travel by private car and incentives to use public transport, walking and cycling for appropriate journeys including intensive travel planning).
2. Improvements to public transport services, and walking and cycling facilities.
3. Optimisation of existing highway network to prioritise public transport and encourage walking and cycling.
4. Major highway capacity enhancements to deal with residual car demand.

4.7.5   Policy 13(2) refers to "Improvements to public transport services" and it may be appropriate to clarify that these improvements could include measures to address public safety issues.

Personal Safety

4.7.6   Personal safety in public spaces is often an issue for lesbians, gay men, bisexuals and transgender people, particularly for those who are open about their sexuality. Issues of homophobia and transphobia are forms of discrimination that can impact on the way this group uses the public realm. This can contribute to social exclusion by preventing these communities from taking part in everyday life.

4.7.7   One of the main ways in which the planning system can help tackle crime and fear of crime is through ensuring the design and layout of development takes steps to reduce the opportunity for crime. This will be especially important in the design of sustainable urban extensions. Policy 3(5) refers to "a high standard of design" and this would include techniques to design out crime and fear of crime. Paragraph 3.3.5 of the supporting text to Policy 3 refers to the use of the Building for Life criteria to assess design. Criterion 15 asks "are public spaces and pedestrian routes overlooked and do they feel safe?" and through producing master plans for sites and the Development Management process it will be important to ensure that appropriate design techniques are used.

4.7.8   Policies 5 and 6 relate to the City and town centres. Alongside the general design techniques to reduce crime and fear of crime the City and town centres have issues linked to the night time economy. As mentioned above one of the aims for the City centre is to create an "inclusive and safe" environment. Specifically, key night time pedestrian routes will be identified and made safer through encouraging appropriate uses. There are also proposals to consider the regulation of licensed premises, hot food takeaways and taxi ranks. Details for the other town centres covered by Policy 6 are less specific due to the number and wide variety of centres covered by Policy 5. Centre specific plans or documents should be assessed to ensure they take account of personal safety issues.

4.7.9   Policy 10 specifically deals with personal safety issues at a number of points. Bullet point 4 refers to the creation of a "safe, inclusive and attractive" environment. Bullet point 6 refers explicitly to crime and fear of crime and reducing these through a variety of measures including active frontages and suitable enclosure treatments. The wording of this section of the policy and the supporting text appear to refer mainly to property theft as opposed to crimes against the person. It may be appropriate to include additional supporting text about the way in which the layout of a development can be designed to avoid dark alleyways and the like. Again, the supporting text makes reference to the Building for Life standard which includes a criterion on overlooking and safety.

Policy	Impact on Sexual Orientation	Outcome of Impact Assessment	Suggested Action
Policy 3 - SUE	Impacts on a range of issues. Precise details of how sites will be developed it is to be included in subsequent site specific policies within the Core Strategy or other local development documents. Plans will need to have regard to other policies of the Core Strategy.	No change to Policy	Ensure that detailed policies or plans for specific sites take account of lesbians, gay men, bisexuals and transgender issues.
Policy 5 – City Centre	Positive impact on personal safety and access to services and employment.	No change to policy	No changes.
Policy 6 – Town Centres	Positive impact on personal safety and access to services and employment. Details will be included in centre specific local development documents.	Amend policy	Ensure that detailed policies or plans for specific centres take account of lesbians, gay men, bisexuals and transgender issues
Policy 10 – Design, the Historic Environment and Enhancing Local Identity	Could more clearly identify that crime and fear of crime are issues which are important in relation to women and transgender people.	Amend policy	Include reference in bullet point 6 (or supporting text?) regarding avoidance of unlit alleys, corners and also subways

Policy 13 – Managing Travel Demand	May lead to extra pressure on public transport but should also increase frequency and routes. Needs to have regards to specific issues faced by lesbians, gay men, bisexuals and transgender communities.	Amend policy	Amend justification to highlight need to address inequality issues in public transport.

Table 4.6 Summary of Sexual Orientation Impact Assessment

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5 . Assessment of Sites

5 Assessment of Sites

5.1 Introduction

5.1.1   An important element of the Aligned Core Strategies is that it identifies 'strategic sites' which will be developed. These include sites for housing, employment and retail as well as mixed use sites. The Haringey court case referred in paragraph 1.2.7 clear shows the importance of having 'due regard' to equality issues when considering the development of sites.

5.1.2   As the development of these sites will become the adopted policy of the Local Authorities involved in the Aligned Core Strategies work, it is important that they are subjected to the Equalities Impact Assessment process. However, unlike the other policies scoped and assessed above they require a separate process to ensure that they are treated in an appropriate way.

5.1.3   Each site or area for growth has been considered against the following:

- The current use of the site; and
- The demographic profile of the area around the site.

5.1.4   Although they will be treated separately to other policies the process will be very similar. Each site needs to be scoped to identify if it has the potential to impact, positively or negatively, on the identified equality themes. This will be especially important where it has been identified that there are spatial concentrations of certain equality groups. The second factor considers the current use of the site and if it is significant to an identified equality group. A site, for example, may include a community centre or open space that is important to a particular group. Although robust evidence is used it is a subjective assessment as to what is considered 'significant' and what constitutes the area to be looked at for equality groups.

5.1.5   It is considered unlikely that any site will have such an adverse impact that it cannot be alleviated through changes to the policy or mitigation although it will still be important to identify what changes or mitigation is needed. As per the guidance, there may be occasions when a policy or site which has a negative impact that cannot be removed or mitigated due to other considerations. In these cases the reasons must be robustly evidenced.

5.2 Broxtowe Borough Council

Site	Ward or Wards	Type of Site	Use of Site	Identified Equality Group	Is site Relevant?
Severn Trent and Boots Site	Beeston Rylands		Employment; Infrastructure	none	Not Relevant – Full Impact Assessment not required
Sustainable Urban Extensions in Broxtowe	Toton & Chilwell Meadows, Stapleford, Trowell, Nuthall East & Strelley		Infrastructure (rail), agricultural	Hindu, Muslim, Sikh (Nuthall East & Strelley)	Religious communities may expand geographically into new developments and local services may be an issue. Full Impact Assessment required

Awsworth, Brinsley, Eastwood, Kimberley and Watnall	Awsworth, Brinsley, Eastwood, Cossall & Kimberley, and Nuthall West & Greasley (Watnall)	Various	none	Not Relevant – Full Impact Assessment not required

Table 5.1 Scoping of sites in Broxtowe

Site	Impact on Equality theme	Outcome of full EqIA	Suggested Action
Sustainable Urban Extensions in Broxtowe	These SUEs are in wards with existing relatively large Hindu, Muslim and Sikh communities which may move into the new developments. They may require additional local services. Extended families may require larger dwellings.		Survey local residents having these religious affiliations about proposed new developments and potential local services (perhaps confidentially in order to avoid the risk of highlighting opposing attitudes between religions and beliefs). Consider outcomes in Area Action Plans, SPDs or Masterplans, in accordance with Policy 3.

Table 5.2 Impact Assessment of sites in Broxtowe

5.3 Erewash Borough Council

Site	Ward or Wards	Type of site	Use of Site	Identified Equality Group	Is site Relevant?
Stanton SUE	• Draycott	Urban edge/brownfield	Former Ironworks	None	Not Relevant – Full Impact Assessment not required
Breaston	• Breaston	Settlement	Specific Sites not yet identified but generally agriculture/vacant Greenfield land	None	Not Relevant – Full Impact Assessment not required
Borrowash	• Ocbrook and Borrowash	Settlement	Specific Sites not yet identified but generally agriculture/vacant Greenfield land	None	Not Relevant – Full Impact Assessment not required
Draycott	• Draycott	Settlement	Specific Sites not yet identified but generally agriculture/vacant Greenfield land	None	Not Relevant – Full Impact Assessment not required
West Hallam	• West Hallam and Dale Abbey	Settlement	Specific Sites not yet identified but generally agriculture/vacant Greenfield land	None	Not Relevant – Full Impact Assessment not required

Ilkeston SRC		Town	Specific Sites not yet identified but generally vacant land	None	Not Relevant – Full Impact Assessment not required
	• Abbotsford • Cotmanhay • Hallam Fields • Kirk Hallam • Ilkeston Central • Ilkeston North • Little Hallam • Old Park				

Table 5.3 Scoping of sites in Erewash

5.4 Gedling Borough Council

Site	Ward or Wards	Type of site	Use of Site	Identified Equality Group	Is site Relevant?
North of Papplewick Lane	• Newstead • Hucknall North	Urban edge/greenfield	Agriculture	None	Not Relevant – Full Impact Assessment not required
Gedling Colliery/Chase Farm	• Gedling • Phoenix • St James	Urban edge/mixed brownfield and greenfield	Former coal mine with some agriculture	Population older than average.	Medium Relevancy – Full Impact Assessment required
Top Wighay Farm	• Newstead • Hucknall North • Hucknall West	Urban edge/greenfield	Agriculture	None	Not Relevant – Full Impact Assessment not required
Bestwood Village	• Bestwood Village	Village	Specific Sites not yet identified but generally agriculture/vacant Greenfield land	Population older than average	Medium Relevancy – Full Impact Assessment TBC
Calverton	• Calverton	Village	Specific Sites not yet identified but generally agriculture/vacant Greenfield land	None	Not Relevant – Full Impact Assessment not required

Ravenshead	• Ravenshead	Village	Specific Sites not yet identified but generally agriculture/vacant Greenfield land	Population older than average	Medium Relevancy – Full Impact Assessment required

Table 5.4 Scoping of sites in Gedling

Full Impact Assessment

5.4.1 Gedling Colliery/Chase Farm and development at Ravenshead and Bestwood Village will be within or adjacent to wards with an average age higher than the Borough, Regional and National figure. This reflects the national trend of an aging population. Sites have not yet been identified in Bestwood and Ravenshead and as such work is at an early stage. However there is not thought to be any negative impact of developing sites in or around these villages although provision should be made to ensure that the age of the surrounding population is taken account in the drawing up plans for how the growth will be provided though considering the type of houses, the design of houses and layout of the development and also any infrastructure provided. Gedling Colliery/Chase Farm development is at a more advanced stage and a planning application is currently being considered in the light of an adopted development brief. Therefore opportunities to incorporate recommendations made through this Equality Impact Assessment process are limited.

Site	Impact on Equality theme	Outcome of Full Impact Assessment	Suggested Action
Gedling Colliery/Chase Farm	Population of surrounding area older than average – need to reflect that in development of the site	No change to policy	None
Ravenshead	Population of surrounding area older than average – need to reflect that in development of the site	Amend Policy	Ensure that detailed policies or plans for specific sites take account of age as an issue

Bestwood Village	Population of surrounding area older than average – need to reflect that in development of the site	Amend Policy	Ensure that detailed policies or plans for specific sites take account of age as an issue

Table 5.5 Impact Assessment of sites in Gedling

5.5 Nottingham City Council

Site	Authority	Ward or Wards	Type of site	Use of Site	Identified Equality Group	Is site Relevant?
Stanton Tip	NCC	• Bulwell	Urban edge	Reclaimed Colliery spoil heap	Age – higher proportion of pop in 0-15 yr age	Medium Relevancy – Full EqIA TBC
Waterside Regeneration Area	NCC	• Bridge • Dales	Urban edge	Mainly industrial area	Religion – Muslim population proportionately higher than Average Race -Asian or Asian British- Pakistani population higher than average	High Relevancy – Full EqIA required
Southside Regeneration Area	NCC	• Bridge • Dales • St Ann's	Urban Area	Employment /commercial	Religion– Muslim population proportionately higher than average Race-Asian or Asian British- Pakistani, and Black or Black British - Black Caribbean populations higher than average	High Relevancy – Full EqIA required

Eastside Regeneration Area	NCC	• Bridge • Dales • St Ann's	Urban Area	Mixed Commercial, residential, leisure & business	Religion – Muslim population proportionately higher than average Race -Asian or Asian British- Pakistani, and Black or Black British - Black Caribbean populations higher than average	High Relevancy – Full EqIA required
North SRF Area	NCC	• Bulwell • Bulwell Forest • Bestwood • Basford • Aspley • Bilborough • Leen Valley	Urban Area	Mixed	N/A	Not Relevant – Full EqIA not required
East/Central SRF Area	NCC	• Sherwood • Mapperley • Berridge • Arboretum • Radford & Park • St Ann's • Dales	Urban Area	Mixed	Religion – Muslim population proportionately higher than Average Race -Asian or Asian British- Pakistani population higher than average	High Relevancy – Full EqIA required

SRF Area 3	NCC	Urban Area	Mixed	N/A	Not Relevant – Full EqIA required
	• Wollaton West • Wollaton East & Lenton Abbey • Dunkirk & Lenton • Bridge • Clifton North • Clifton South				

Table 5.6 Scoping of Sites in Nottingham City

Full Impact Assessment

5.5.1   The scoping exercise identified the Age equality strand as being relevant to the development of the Stanton Tip site. Draft proposals include new family housing (up to 500), employment uses and additional and enhanced green infrastructure, leading to the creation of a new community which would connect with and provide for existing adjacent communities. It is not thought that these proposals would result in any negative impact although provision should be made to ensure that the age of the surrounding population is taken account in the drawing up plans for how the growth will be provided though considering the type of houses, the design of houses and layout of the development and also any infrastructure provided.

5.5.2   The 'Religion' and 'Race' strands were identified as being of relevance to the Waterside, Southside and Eastside Regeneration Zones. Draft proposals for the Waterside Regeneration Area include the development of new homes (up to 3,000), significant new employment development, new retail development of an appropriate scale, as well as new offices in the Eastcroft area of the Waterside Regeneration Zone. The plan proposes that the Southside Regeneration Area will become a become a vibrant central business district mixed use area with a predominance of offices, supported by new homes and businesses, new hotels and complementary retail and leisure activity. It is proposed that the Eastside Regeneration Zone will be a major location for office development and will also include elements of residential and complementary retail developments to meet local worker and residents needs, leisure and education. It is envisaged that all these proposals can have positive impacts on the equality strands though it will be important that detailed policies and plans for the Regeneration Zones take full account specific needs of the local communities including race and religion related issues.

5.5.3 The scoping stage identified Religion and race strands as being relevant to the East/Central SRF Area. The plan identifies how the framework for the regeneration and transformation of Nottingham's neighbourhoods will be set out in Strategic Regeneration Frameworks. Where a significant level of intervention is required, Area Action Plans, Supplementary Planning Documents or informal planning guidance (such as Neighbourhood Plans) will be prepared, depending on the scale and nature of intervention. Such documents should in their formulation take into account of race and religion related issues.

Site	Impact on Equality theme	Outcome of Full EqiA	Suggested Action
Stanton tip	The proportion of young people (0-15) in the surrounding area is higher than average – need to reflect that in development of the site	Amend Policy	Ensure that detailed policies or plans for specific sites take account of age as an issue.
Waterside Regeneration Area	The Regeneration Area is in wards with an existing relatively large Muslim community and higher than average Asian or Asian British- Pakistani populations– need to reflect that in development of the area	Amend Policy	Ensure that detailed plans for specific sites take account of religious and race related issues
Southside Regeneration Area	The Regeneration Area is in wards with existing relatively large Muslim community and higher than average Asian or Asian British- Pakistani, and Black or Black British - Black Caribbean populations– need to reflect that in development of the site	Amend Policy	Ensure that detailed plans for specific sites take account of religious and race related issues

Eastside Regeneration Area	The Regeneration Area is in wards with existing relatively large Muslim community and higher than average Asian or Asian British- Pakistani, and Black or Black British - Black Caribbean populations– need to reflect that in development of the area	Amend Policy	Ensure that detailed plans for specific sites take account of sites take account of religious and race related issues
East/Central SRF Area	The Regeneration Area is in wards with existing relatively large Muslim community and higher than average Asian or Asian British- Pakistani populations– need to reflect that in development of the area	Amend Policy	Ensure that detailed plans for specific sites take account of religious and race related issues

Table 5.7 Impact Assessment of Sites in Nottingham City

5.6 Rushcliffe Borough Council

Site	Authority	Ward or Wards	Type of site	Use of Site	Identified Equality Group	Is site Relevant?
East of Gamston	RBC	• Gamston • Tollerton • Cotgrave	Urban edge/greenfield/ brownfield	Agriculture	Population older than average	Medium relevancy (significant site) – Full EqIA required
South of Clifton	RBC	• Gotham • Clifton South • Clifton North	Urban edge/ greenfield	Agriculture	Population older than average	Medium relevancy (significant site) – Full EqIA required
Cotgrave Colliery	RBC	• Cotgrave	Brownfield regeneration site	Former Colliery	None	Not Relevant – Full EqIA not required
Bingham	RBC	• •	Village	Specific Sites not yet identified but generally agriculture/ Greenfield land	None	Not Relevant – Full EqIA not required
Cotgrave	RBC	• Cotgrave	Village	Specific Sites not yet identified but generally agriculture/ Greenfield land	None	Not Relevant – Full EqIA not required

Site	Authority	Ward or Wards	Type of site	Use of Site	Identified Equality Group	Is site Relevant?
East Leake	RBC	• Leake	Village	Specific Sites not yet identified but generally agriculture/ Greenfield land	None	Not Relevant – Full EqIA not required
Keyworth	RBC	• Keyworth North • Keyworth South	Village	Specific Sites not yet identified but generally agriculture/ Greenfield land	Population older than average	Medium relevancy – Full EqIA required
Radcliffe on Trent	RBC	• Trent • Manvers	Village	Specific Sites not yet identified but generally agriculture/ Greenfield land	Population older than average	Medium Relevancy – Full EqIA TBC
Ruddington	RBC	• Ruddington	Village	Specific Sites not yet identified but generally agriculture/ Greenfield land	None	Not Relevant – Full EqIA not required

Table 5.8 Scoping of Sites in Rushcliffe

Full Impact Assessment

5.6.1 South of Clifton, East of Gamston and development at Keyworth and Radcliffe on Trent would be within or adjacent to wards with an average age markedly higher than the Borough, regional and national figures. This, in part, reflects the national trend of an aging population. Sites have not yet been identified in Keyworth and Radcliffe on Trent as such work is at an early stage. South of Clifton and East of Gamston are at a more advanced stage, in that the general locations for development are known, but detailed proposals are not yet finalised. In respect of all four locations, it is not thought that there would be any particular negative impacts from developing sites in or around these settlements in relation to identified equality groups, although provision should be made to ensure that the age of the surrounding population is taken into account in the drawing up plans for how the growth would be accommodated though considering the type of homes, the design homes and layout of the development and also any infrastructure provided.

Site	Impact on Equality theme	Outcome of Full EqiA	Suggested Action
South of Clifton	Population of surrounding area older than average – need to reflect that in development of the site	Amend Policy	Ensure that detailed policies or plans for specific sites take account of age as an issue
East of Gamston	Population of surrounding area older than average – need to reflect that in development of the site	Amend Policy	Ensure that detailed policies or plans for specific sites take account of age as an issue
Keyworth	Population of surrounding area older than average – need to reflect that in development of the site	Amend Policy	Ensure that detailed policies or plans for specific sites take account of age as an issue
Radcliffe on Trent	Population of surrounding area older than average – need to reflect that in development of the site	Amend Policy	Ensure that detailed policies or plans for specific sites take account of age as an issue

Table 5.9 Impact Assessment of Sites in Rushcliffe

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6 Results

6.1 Action Plan

6.1.1 The Action Plan stage pulls together the suggested changes from the impact assessments carried out for each of the policies relevant to the six equality themes and provides details of who is responsible for carrying out the change and when that change will be made.

6.1.2 The following outcomes identified by the Equality & Human Rights Commission have been used:

1. <u>No major change</u> – the impact assessment demonstrates that the policy is robust and that the evidence shows no potential for discrimination and that all opportunities to promote equality have been taken.
2. <u>Adjust the policy to remove the barriers or better promote equality</u> – the impact assessment demonstrates that the policy can be amended by either removing the elements which cause the discrimination or adding elements to mitigation any negative impact or further promote equality.
3. <u>Continue with the policy despite potential for adverse impact or missed opportunities to promote equality</u> – in some cases there may be other reasons which outweigh the adverse impact on equality caused by the policy. However there is no justification for direct discrimination.
4. <u>Stop and remove the policy</u> – if the policy shows actual or potential unlawful discrimination it must be stopped and removed or changed.

6.1.3 In all cases the outcome should be justified. This will be especially important in relation to policies which are continued despite the potential for adverse impact.

Policy	Outcome of Scoping Stage	Outcome	Action	Responsibility	Timescale	Monitoring
1 Climate Change	Climate change is a global issue and will affect everybody in Greater Nottingham. Issues relating to flooding evacuation plans should be addressed by the Emergency Services	No major change				TBC
2 Spatial Strategy	Policy acts as a broad over-arching policy, the effects will be more apparent in the individual policies. Need to cross reference to other policies and ensure that detailed proposals for areas/sites take account of equalities issues.	No major change				TBC
3 Sustainable Urban Extensions	While relevant to a number of equality themes this policy ties together elements from other policies and will look to apply them to large strategic sites. The impact of these policies will be assessed through the issue specific policies (i.e. housing mix and choice)	Adjust the policy	Ensure that detailed policies or plans for specific sites take account of equality issues	All local authorities	As and when policies or proposals for sites are taken forward through policies in the ACS, through AAP/SPDs or through	TBC

					Development Management process	
4 Employment Provisions and Economic Development	Highly Relevant: • Race • Gender	Adjust the policy	Add paragraph to subtext of policy to state that facilities that support or do not conflict with the main use of a site may be acceptable as part of employment sites.	Erewash Borough Council	When submission draft of ACS is being prepared	TBC
5 Nottingham City Centre	Highly Relevant: • Gender • Age Medium Relevant: • Race • Disability • Age • Religion • Sexual Orientation	Adjust the policy	Amend 5(3) to read "a range of cultural facilities to appeal to the full range of the conurbations population". Add paragraph to subtext of policy to state that public transport focus on City Centre is not at the expense of orbital routes around the conurbation.	Nottingham City Council	When submission draft of ACS is being prepared	TBC

6 The Role of Town and Local Centres	Highly Relevant: • Gender • Age Medium Relevant: • Race • Disability • Age • Religion • Sexual Orientation	Adjust the policy	Ensure that detailed policies or plans for specific centres take account of equality issues	All local authorities	As and when policies or proposals for sites are taken forward through policies in the ACS, through AAP/SPDs or through Development Management process	TBC
7 Regeneration	While relevant to a number of equality themes this policy ties together elements from other policies and will look to apply them to large regeneration sites. The impact of these policies will be assessed through the issue specific policies (i.e. housing mix and choice)	Adjust the policy	Ensure that detailed policies or plans for specific sites take account of equality issues	All local authorities	As and when policies or proposals for sites are taken forward through policies in the ACS, through AAP/SPDs or through Development Management process	TBC
8 Housing Size, Mix and Choice	Highly Relevant: • Gender • Disability • Age Medium Relevant:	Adjust the policy	Add paragraph to subtext to expand on lifetime homes concept and ensure that as many homes as possible comply	Rushcliffe Borough Council	When submission draft of ACS is being prepared	TBC

Policy	Relevance	Action	Details	Responsible Body	Timescale	Status
	• Race • Religion		with the standard as will have benefits beyond 'older people'			
9 Gypsies, Travellers and Travelling Showpeople	Highly Relevant • Race	Adjust the policy	Ensure that detailed policies or plans for specific sites take account of race-related issues.	Rushcliffe Borough Council	When submission draft of ACS is being prepared	TBC
10 Design, the Historic Environment and Enhancing Local Identity	Highly Relevant: • Gender • Disability • Age Medium Relevant: • Race • Religion • Sexual Orientation	Adjust the policy	Add paragraph to subtext of policy to provide more details as to what 'designing out crime' could involve and achieve. Amend bullet point 4 to support provision of Lifetime Neighbourhoods. Amend bullet point 2 to include reference to "building on the character that residents have	Nottingham City Council	When submission draft of ACS is being prepared	TBC

11 Local Services and Healthy Lifestyles	Highly Relevant: • Gender • Disability • Age • Religion Medium Relevant: • Race • Sexual Orientation	Adjust the policy	provided to areas such as religious or cultural character" Add places of religious instruction and church halls to list of community facilities in paragraph 3.11.8 Add paragraph to sub-text to identify that account will be taken of population and/or catchment to be served by services and any specific requirements of that community when applying the policy	Gedling Borough Council	When submission draft of ACS is being prepared	TBC
12 Culture, Sport and Tourism	Medium Relevant: • Race • Religion	Adjust the policy	Add paragraph to sub-text to identify that account will be taken of population and/or	Nottingham City Council	When submission draft of ACS is being prepared	TBC

			catchment to be served by facilities. Add paragraph to subtext to identify importance of religion to culture and require sensitive development at places of worship which serve other purposes.			
13 Managing Travel Demand	Highly Relevant: • Gender • Disability • Age Medium Relevant: • Race • Religion	Adjust the policy	Amend justification to highlight need to address inequality issues in public transport	Nottingham City Council & Nottinghamshire County Council	When submission draft of ACS is being prepared	TBC
14 Transport Infrastructure Provision	A full EqIA is not required. As the Core Strategy is not the deliverer of these transport schemes it is considered that it is not appropriate for this EqIA to	No major change				TBC

		undertake the assessment. Implementation through the spatial planning is considered more important. The Comprehensive Spending Review currently underway will impact on the proposals listed.	Gedling Borough Council	When submission draft of ACS is being prepared	TBC
15 Green Infrastructure, Parks and Open Space	Highly Relevant: • Gender Medium Relevant • Race • Disability • Age • Religion • Sexual Orientation	Adjust the policy	Amend Policy 15(4) to ensure that where parks or open spaces are underused or undervalued that positive management is attempted to bring them back into full use. Add new policy 15(5) to state that all green infrastructure should be designed to be as inclusive as possible.		

			TBC
16 Biodiversity	No full EqIA required as this policy is designed to protect environmental site of biodiversity value such as SINCs. Provision of new biodiversity for public access is considered under Policy 15.	No major change	
17 Landscape Character	No Full EqIA required as this is a policy related to the protection of the landscape.	No major change	TBC
18 Infrastructure	Full EqIA is not required as this policy is technical policy with relevance to planners and developers. The infrastructure provided, especially community infrastructure, can be assessed under other policies or through site specific details	No major change	TBC
19 Developer Contributions	Full EqIA is not required as this policy is technical policy with relevance to planners and developers. The policy's purpose is to create a mechanism for delivery of infrastructure	No major change	TBC

Table 6.1 Equality Impact Assessment Action Plan

6.2 Monitoring

6.2.1   Guidance issued by the Equality & Human Rights Commission sets out that it is important to use the monitoring, evaluation and review processes to ensure that we have identified and accounted for the correct impact and that new impacts are identified and addressed in a timely fashion.

6.2.2   At present, monitoring is carried out through the Annual Monitoring Report which contains information about the implementation of policies and the extent to which targets are being met. Many of the indicators that will be collected for this will also be relevant to the equalities issues identified in this report. Once the monitoring arrangements for the Aligned Core Strategies have been developed they will be reviewed to ensure that equality issues raised by the Equality Impact Assessment are appropriately monitored.

6.2.3   The Aligned Core Strategies includes a number of proposals for the development of sites. These include new SUEs, regeneration areas, employment sites and Town Centres. Each type of site will impact differently on different equality groups to different levels. To ensure that we have 'due regard' to the need to remove discrimination and promote equality in developing plans for these sites it will be important to develop a method to help identify if a site will discriminate and if all reasonable steps to promote equality have been taken.

6.2.4   This will partly be done by the Site Impact Assessment carried out as part of the Equality Impact Assessment which has identified the current use of strategic sites and any significant equality communities in the surrounding area. The second element will be to look at what is proposed for these strategic sites and how they will operate. This will require looking at the mix of uses (including affordable housing and community facilities) and also the design and layout of the scheme. A proportionate approach to smaller sites will also need to be developed. Many of these issues may be monitored when looking at how developments meet the Buildings for Life and Lifetime Homes criteria and the use of these standards may be appropriate proxy's although a more detailed assessment will be needed when the monitoring arrangements are finalised.

6.2.5   It should be noted that the new Coalition Government are likely to be making changes to the monitoring requirements for Local Authorities. It is unclear at present exactly what indicators we will be required to collect although it may provide scope for the collection of more locally specific indicators.

6.3 Consultation

6.3.1   As noted above, the guidance on carrying out Equality Impact Assessments requires the findings of assessments to be published. Alongside this it is proposed to undertake consultation with those involved with equality issues to provide feedback on the findings and recommendations contained in the Assessment to establish if the correct issues have been identified and if the changes suggested are sufficient to address any issues raised in the impact assessment. This will also allow the methodology to be discussed and alterations to be made for the second phase.

6.3.2 The consultation will take the form of a questionnaire which can be completed online or on paper. A wide variety of stakeholders, representative groups or those with firsthand knowledge of equality issues have been contacted as part of the publication of the Phase 1 report

6.3.3 Once the consultation period is completed a report will be prepared to analyse the responses and identify the key issues which need to be addressed in drafting the submission draft of the Aligned Core Strategy and the Phase 2 Equality Impact Assessment. The consultation will act as a feedback helping ensure that the right approach is being taken to the Equality Impact Assessment.

6.4 Next Steps

6.4.1 Both the Equality Impact Assessment and the consultation report will be used by those drafting policies for the submission draft of the Core Strategy. The Action Plan sets out the changes that will need to be considered alongside other matters when preparing the policies.

6.4.2 The second phase of the Equality Impact Assessment will need to be carried out as the final versions of the policies emerge. This will be done on an ad-hoc basis as policies are likely to be ready at different times during the drafting process. It is likely that the first phase of the Equality Impact Assessment will reduce the workload required for the submission stage as many of the policies will have been scoped and assessed for impact, key issues will have been identified, steps taken to better promote equality or remove discrimination and Planning Officers involved in the process will have more experience of equality issues and the Equality Impact Assessment process.
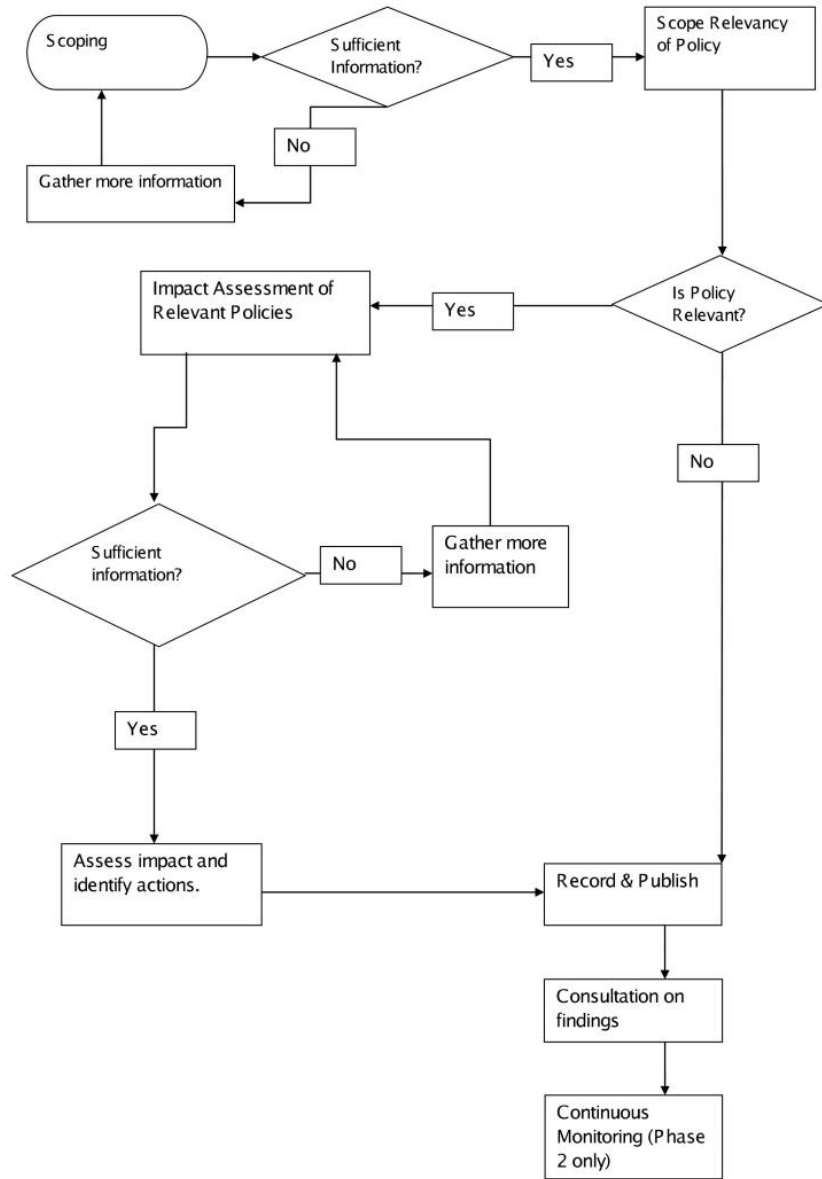
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Appendix 1

Figure .1 Equality Impact Assessment process flowchart

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Appendix 2

Aligned Core Strategy

Equalities Impact Assessment

Policy	15 Green Infrastructure, Parks & Open Space
Scoping Completed by	SA Team 15/6/10
What will policy do?	Creation of new assets to link with river corridors, waterways, woodlands, nature reserves, urban green space, historic sites and other existing assets. Protect existing Green Infrastructure assets.
Who are the 'customers' of the Policy?	Wider community especially local residents
What evidence or information already exists?	6Cs Growth Point – 'Towards a GI Strategy: Sub-regional Strategic Framework' Consultation Draft (2009) Greenwood Strategic Plan (2000) Open or Green Space Strategies and Audits for each council Nottingham City Council – Corridors to the Countryside Project: Strategy for the River Leen (1998) Nottingham City, Derbyshire and Nottinghamshire Rights of Way Improvement Plans Trent River Park Vision and Action Plan (2008) Biodiversity plans; access plans
Does the Policy relate to an area where there are identified inequalities?	Access for certain groups – ethnic minorities, proximity issues. Income inequalities – e.g less sites in inner city Access to burial land is important with some faiths having specific requirements

Aligned Core Strategy

Equalities Impact Assessment

	Race	Gender	Disability	Age	Religion	Sexual Orientation
Have there been any issues with the way the current policy works?	Protect everything? Or select special areas. This policy may want to restrict access e.g some SSSIs GI is well covered, but biodiversity – too general?					
Has the policy been identified as important by the local authority?						
Is the policy relevant and if so to which groups is it relevant?						
	Ethnic access; and (policy 15- 3d)	Fear of crime	Access to GI assets	Type of asset and facilities provided. Fear of crime	Access to burial land	Fear of crime
Conclusion	Full EqIA required due to public safety, accessibility and type of facility issues being relevant to equality groups.					

Figure .1 Example Scoping Sheet

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Appendix 3