

Greater Nottingham

Broxtowe Borough Council

Gedling Borough Council

Nottingham City Council

Equalities Impact Assessment

Phase 3 Report: Publication Version Aligned Core Strategy

and Proposed Changes

February 2013



Introduction

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.

The Equality Act 2010 (section 49) sets out the general equality duty for public bodies. Previously the equality duty had related to individual characteristics (such as race, gender and disability). The Equality Act 2010 combined and streamlined these at the same time as widening the range of protected characteristics and the definition of 'discrimination'. The Equality Duty requires that in exercising their functions 'due regard' is given to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

'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 law² this must be done in a conscious way with focus on the specific requirements of the legislation. However, 'due regard' does not mean that a change needs to be made but that appropriate weight needs to be given. Other issues, such as viability or the need to deliver development for economic or regeneration purposes may outweigh the equality considerations. In these cases the reasons should be robust and transparent. It is clear that this Equality Impact Assessment and the changes that result from it will be an important part of the preparation and decision to adopt the Aligned Core Strategies as part of the development plan for the Local Authorities involved.

Equality Impact Assessments have been carried out as part of the preparation of the Aligned Core Strategies. This has been undertaken in two phases:

- Phase 1 – on the policies in the 'Option for Consultation'; and
- Phase 2 – on the policies in the 'Publication Version'.

Following the public consultation on the Publication Version a number of changes to the policies are proposed. While the changes are not considered major it is

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

² R (on the application of Harris) v London Borough of Haringey (Equality and Human Rights Commission intervening) - [2010] All ER (D) 177 (Jun)

necessary to undertake a further third phase of assessment to ensure there are no issues. This Phase 3 Report is on the Publication Version with the Proposed Changes. This also includes the addition of the policy regarding the 'Presumption in Favour of Sustainable Development'. Details of the proposed changes are set out in the 'Schedule of Proposed Changes' (Feb 2013).

The approach to this phase will follow the approach adopted at each of the earlier phases of assessment. Firstly, the policies will be scoped for their relevance. The purpose of this stage is to identify the policies which have the potential to impact, positively or negatively, on each of the protected characteristics.

For those policies which are considered to be relevant, an assessment of impact will be carried out. This will consider the key issues affected by spatial planning identified for each of the protected characteristics and the impact of the policy on these issues. This will be followed by an Action Plan which will set out suggested actions to improve the equality of the Aligned Core Strategies.

As noted above, there have been previous phases of Equality Impact Assessment. This means that a significant amount of work has been done to scope the relevance of policies and assess the impact of them. Rather than 'reinvent the wheel', this new phase has focused on the changes that are proposed from the Publication Version. As such this document should be read alongside the Phase 1 and Phase 2 reports to fully understand the issues and process.

Scoping Stage

The table below sets out whether a policy has become more or less relevant as a result of the changes to policies from the Publication Version:

Policy	Relevance at Publication Version	Do changes to the policy affect the relevance to equality issues?	Relevance at Submission Version
Policy A – Presumption in Favour of Sustainable Development	N/a – a new policy.	We are required to add this policy to ensure the Aligned Core Strategies are consistent with the NPPF. It sets out how we will work with developers to deliver sustainable development.	<p>The policy will be used to guide the decision-making process especially on planning applications. The policy is intended to ensure decision take a balanced view of environmental, economic and social issues. The social element would include consideration of any specific circumstances of the applicant relevant to the proposal including if they had one of the protected characteristics.</p> <p>Given the uncertainty of the proposals that will come forward and who will make them and also the limited scope to amend the wording of the Policy it is considered that an Impact Assessment is not required.</p> <p>No Impact Assessment required.</p>
1 Climate Change	<p>Climate change is a global issue and will affect everybody in Greater Nottingham. Issues relating to evacuation plans should be addressed by the Emergency Services.</p> <p>New information suggests that some protected characteristics will be more vulnerable to the effects of climate change than others. This includes the very</p>	<p>The changes do not alter the policy approach.</p> <p>No change to relevance</p>	<p>Climate change is a global issue and will affect everybody in Greater Nottingham. Issues relating to evacuation plans should be addressed by the Emergency Services.</p> <p>New information suggests that some protected characteristics will be more vulnerable to the effects of climate change than others. This includes the very young, the elderly and those with disabilities.</p> <p>Medium Relevance:</p>

	<p>young, the elderly and those with disabilities.</p> <p>Medium Relevance:</p> <ul style="list-style-type: none"> • Age • Disability 		<ul style="list-style-type: none"> • Age • Disability
2 Spatial Strategy	<p>Policy acts as a broad over-arching policy, the effects will be more apparent in the individual policies. Need to cross reference to assessments of other policies and ensure that detailed proposals for areas/sites take account of equalities issues.</p> <p>No Impact Assessment required.</p>	<p>Changes do not alter the overall housing target or strategy.</p> <p>No change to relevance.</p>	<p>Policy acts as a broad over-arching policy, the effects will be more apparent in the individual policies. Need to cross reference to assessments of other policies and ensure that detailed proposals for areas/sites take account of equalities issues.</p> <p>No Impact Assessment required.</p>
3 Green Belt	<p>This policy is a technical Planning Policy related to the review of the Green Belt and how it will be carried out. As such it is not relevant to equalities.</p> <p>No Impact Assessment required.</p>	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>This policy is a technical Planning Policy related to the review of the Green Belt and how it will be carried out. As such it is not relevant to equalities.</p> <p>No Impact Assessment required.</p>
4 Employment Provision and Economic Development	<p>High Relevance:</p> <ul style="list-style-type: none"> • Race • Gender/Gender Reassignment/Pregnancy and Maternity <p>Medium relevance:</p> <ul style="list-style-type: none"> • Disability 	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>High Relevance:</p> <ul style="list-style-type: none"> • Race • Gender/Gender Reassignment/Pregnancy and Maternity <p>Medium relevance:</p> <ul style="list-style-type: none"> • Disability <p>Low Relevance</p>

	<p>Low Relevance</p> <ul style="list-style-type: none"> • Age • Religion • Sexual Orientation • Marriage and Civil Partnership 		<ul style="list-style-type: none"> • Age • Religion • Sexual Orientation • Marriage and Civil Partnership
5 Nottingham City Centre	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Age • Race • Disability • Religion • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership 	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Age • Race • Disability • Religion • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership
6 The Role of Town and Local Centres	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Age • Race • Disability • Religion • Sexual Orientation <p>Low Relevance</p>	<p>The changes are of a technical planning nature and do not alter the approach.</p> <p>No change to relevance.</p>	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Age • Race • Disability • Religion • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership

	<ul style="list-style-type: none"> • Marriage and Civil Partnership 		
7 Regeneration	<p>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).</p> <p>No Impact Assessment required.</p>	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>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).</p> <p>No Impact Assessment required.</p>
8 Housing Size, Mix and Choice	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Disability • Age <p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Religion <p>Low Relevance</p> <ul style="list-style-type: none"> • Sexual Orientation • Marriage and Civil Partnership 	<p>There are new references to accommodation for older people and HMOs. Residents of HMOs may include a higher proportion of younger people and those from ethnic minorities. The requirement for affordable housing has also been changed due to an increased need in City and Broxtowe.</p> <p>While relevance has not altered the changes are deemed to be more than minor in equality terms. As such the impact of the</p>	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Disability • Age <p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Religion <p>Low Relevance</p> <ul style="list-style-type: none"> • Sexual Orientation • Marriage and Civil Partnership

		revised Policy should be reconsidered.	
9 Gypsies, Travellers and Travelling Showpeople	<p>High Relevance:</p> <ul style="list-style-type: none"> • Race <p>Low Relevance</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Age • Disability • Religion • Sexual Orientation • Marriage and Civil Partnership 	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>High Relevance:</p> <ul style="list-style-type: none"> • Race <p>Low Relevance</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Age • Disability • Religion • Sexual Orientation • Marriage and Civil Partnership
10 Design, the Historic Environment and Enhancing Local Identity	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Disability • Age <p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Religion • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership 	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Disability • Age <p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Religion • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership

<p>11 Historic Environment</p>	<p>Low Relevance:</p> <ul style="list-style-type: none"> • Age • Disability • Gender/Gender Reassignment/Pregnancy and Maternity • Religion • Race • Sexual Orientation • Marriage and Civil Partnership <p>Access to heritage assets requires careful consideration to allow access but not to damage the value or significance of the asset. Places of Worship may also be heritage assets and will require sensitive consideration. However these are site specific issues that are not addressed by the Aligned Core Strategies.</p> <p>No Impact Assessment required.</p>	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>Low Relevance:</p> <ul style="list-style-type: none"> • Age • Disability • Gender/Gender Reassignment/Pregnancy and Maternity • Religion • Race • Sexual Orientation • Marriage and Civil Partnership <p>Access to heritage assets requires careful consideration to allow access but not to damage the value or significance of the asset. Places of Worship may also be heritage assets and will require sensitive consideration. However these are site specific issues that are not addressed by the Aligned Core Strategies.</p> <p>No Impact Assessment required.</p>
<p>12 Local Services and Healthy Lifestyles</p>	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Disability • Age • Religion 	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Disability • Age • Religion

	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership 		<p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership
13 Culture, Sport and Tourism	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Religion <p>Low Relevance</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Age • Disability • Sexual Orientation • Marriage and Civil Partnership 	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Religion <p>Low Relevance</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Age • Disability • Sexual Orientation • Marriage and Civil Partnership
14 Managing Travel Demand	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Disability • Age <p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Religion 	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender/Gender Reassignment/Pregnancy and Maternity • Disability • Age <p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Religion • Sexual Orientation

	<ul style="list-style-type: none"> Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> Marriage and Civil Partnership 		<p>Low Relevance</p> <ul style="list-style-type: none"> Marriage and Civil Partnership
15 Transport Infrastructure Provision	<p>A full EqlA 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 EqlA to undertake the assessment. Implementation through the spatial planning is considered more important. The Comprehensive Spending Review currently underway will impact on the proposals listed.</p> <p>No Impact Assessment required.</p>	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>A full EqlA 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 EqlA to undertake the assessment. Implementation through the spatial planning is considered more important. The Comprehensive Spending Review currently underway will impact on the proposals listed.</p> <p>No Impact Assessment required.</p>
16 Green Infrastructure, Parks and Open Space	<p>Medium relevance:</p> <ul style="list-style-type: none"> Gender/Gender Reassignment/Pregnancy and Maternity Age Race Disability Religion Sexual Orientation <p>Low Relevance</p>	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>Medium relevance:</p> <ul style="list-style-type: none"> Gender/Gender Reassignment/Pregnancy and Maternity Age Race Disability Religion Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> Marriage and Civil Partnership

	<ul style="list-style-type: none"> • Marriage and Civil Partnership 		
17 Biodiversity	<p>No full EqIA required as this policy is designed to protect environmental site of biodiversity value such as SINC. Provision of new biodiversity for public access is considered under Policy 16.</p> <p>No Impact Assessment required.</p>	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>No full EqIA required as this policy is designed to protect environmental sites of biodiversity value such as SINC. Provision of new biodiversity for public access is considered under Policy 16.</p> <p>No Impact Assessment required.</p>
18 Infrastructure	<p>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.</p> <p>No Impact Assessment required.</p>	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>Full EqIA is not required as this policy is a 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.</p> <p>No Impact Assessment required.</p>
19 Developer Contributions	<p>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</p> <p>No Impact Assessment required.</p>	<p>Only minor wording changes.</p> <p>No change to relevance.</p>	<p>Full EqIA is 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</p> <p>No Impact Assessment required.</p>

Impact Assessment

The tables below show the assessment of impact for each of the protected characteristics. The conclusion section below sets out those changes which have not been made and reasons why through all the stages of the EqlA.

Race

Policy	Impact on Race	Outcome of Impact Assessment	Suggested Action
Policy 4 – Employment Provision and Economic Development	Positive impact on access to employment and training opportunities across Greater Nottingham.	No change	No change
Policy 5 - Nottingham City Centre	Positive impact on personal safety and access to services	No change	No change
Policy 6 – The Role of Town and Local Centres	Positive impact on personal safety and access to services	No change	No change
Policy 8 – Housing Size, Mix and Choice	Positive impact from provision of affordable housing and delivery of mix of housing sizes although delivery issues due to economic climate. Positive impact from rebalancing of areas with large numbers of HMOs to deliver sustainable communities.	No change	No change
Policy 9 – Gypsies, Travellers and Travelling Showpeople	Positive impact from delivery of suitable sites. The justification text highlights that the consultation into specific sites will require sensitive and appropriate consultation with the groups that will use the sites along with the community in the surrounding area	No change	No change
Policy 10 – Design and Enhancing	Positive impact from high design standards including reducing opportunities for	No change	No change

Local Identity	crime and ensuring new developments are inclusive		
Policy 12 – Local Services and Healthy Lifestyles	Positive impact from provision of accessible services	No change	No change
Policy 13 – Culture, Tourism and Sport	The justification text has been amended to ensure flexibility in application of policy to allow needs of communities to be met within those communities.	No change	No change
Policy 16 – Green Infrastructure, Parks and Open Space	Positive impact from increased provision of GI. Positive impact from reference in policy to ensuring that GI is as “ <i>inclusive as possible</i> ” although monitoring this will be important.	No change	No change

Gender, Gender Identity and Pregnancy & Maternity

Policy	Impact on Gender, Gender Identity and Pregnancy & Maternity	Outcome of Impact Assessment	Suggested Action
Policy 4 – Employment Provision and Economic Development	Positive impact on access to employment through provision of a range of sites and focus for offices development in City and town centres. Positive impacts in association with Policy 11 employment as opportunities in centres offers ability to link trips and access services and facilities. Positive impact from identification in justification text that associated facilities (such as childcare) can also be provided alongside employment sites.	No change	No change
Policy 5 - Nottingham City Centre	Positive impact on personal safety and access to services and employment.	No change	No change

	Positive impact for those with children and young babies from the support for family orientated leisure development.		
Policy 6 – The Role of Town and Local Centres	Positive impact on personal safety and access to services and employment. Positive impact from reference to access improvements taking account of equality issues	No change	No change
Policy 8 – Housing Size, Mix and Choice	Positive impact from provision of affordable housing although delivery issues due to economic climate. Only providing a proportion of lifetime homes may not sufficiently promote equalities	Amend Policy	Amend policy to provide all new dwellings to the lifetime homes standard
Policy 10 – Design and Enhancing Local Identity	Positive impact from high design standards including reducing opportunities for crime and ensuring new developments are inclusive.	No change	No change
Policy 12 – Local Services and Healthy Lifestyles	Positive impact from provision of accessible services	No change	No change
Policy 14 – Managing Travel Demand	Positive impact from increase in frequency and routes likely to outweigh any negative impacts from increase in use. Reference to “ <i>people with mobility issues</i> ” will include consideration of issues related to pregnancy/maternity and the use of push chairs etc.	No change	No change
Policy 16 – Green Infrastructure, Parks and	Positive impact from increased provision of GI. Positive impact from	No change	No change

Open Space	reference in policy to ensuring that GI is as “ <i>inclusive as possible</i> ” although monitoring this will be important.		
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Disability

Policy	Impact on Disability	Outcome of Impact Assessment	Suggested Action
Policy 1 – Climate Change	Positive impact from adapting an tackling climate change. Positive impact from reference in paragraph 3.1.6 to effects of climate change being felt more by very young and elderly.	No change	No change
Policy 4 – Employment Provision and Economic Development	Positive impact on access to employment through provision of a range of suitable sites Positive impact from provision of employment opportunities within centres which will ensure linked access to other services and facilities.	No change	Ensure that detailed policies or plans for specific centres take account of equality issues
Policy 5 - Nottingham City Centre	Positive impact on personal safety and access to services and employment.	No change	Ensure that detailed policies or plans take account of equality issues
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 and will take account of equality issues as identified in the supporting text.	No change	Ensure that detailed policies or plans for specific centres take account of equality issues
Policy 8 – Housing Size, Mix and Choice	Positive impact arising from amount of affordable housing as well as from a proportion of homes that should be capable of being	Amend policy	Amend to policy to provide all new dwellings to the lifetime homes standard

	adapted to suit the lifetime of occupants. Only providing a proportion of 'life time' homes may not sufficiently promote equalities.		
Policy 10 – Design and Enhancing Local Identity	Positive impact arising from the requirement that all new developments should be designed to create an inclusive environment.	No change	No change
Policy 12 – Local Services and Healthy Lifestyles	Positive impact from provision of accessible services	No change	No change
Policy 14 – Managing Travel Demand	The need to fully address existing accessibility deficiencies as part of the prioritisation of new development process will result in positive improvement	No change	Ensure that the implementation of the approach has regard to the needs of people with mobility difficulties.
Policy 16 – Green Infrastructure, Parks and Open Space	Positive impact from improved provision of green infrastructure. A requirement that new or enhanced Green Infrastructure corridors and assets should be as inclusive as possible will have a positive impact	No change	No change

Age

Policy	Impact on Age	Outcome of Impact Assessment	Suggested Action
Policy 1 – Climate Change	Positive impact from adapting and tackling climate change. Positive impact from reference in paragraph 3.1.6 to effects of climate change being felt more by the very young and elderly.	No change	No change
Policy 5 - Nottingham	Positive impact on personal safety and access to	No change	No change

<p>City Centre</p>	<p>services and employment. However the role of the City Centre as a hub should not be at expense of other centres across the conurbation.</p> <p>The support for a night time economy potentially causes divisions between younger and older generations. However, the policy will have regard to crime and disorder issues through the regulation of licensed premises.</p> <p>Positive design/layout of developments will help decrease crime and the fear of crime.</p> <p>Positive impact from support for family orientated leisure and facilities for young people.</p>		
<p>Policy 6 – The Role of Town and Local Centres</p>	<p>Positive impact on personal safety and access to services and employment. Details will be included in centre specific work.</p> <p>The support for a night time economy potentially causes divisions between younger and older generations. However, the policy will have regard to crime and disorder issues through the regulation of licensed premises.</p> <p>Positive design/layout of developments will help decrease crime and the fear of crime.</p> <p>Positive impact from access to local services, the range of uses and environmental improvements will be improved through this policy</p>	<p>No change</p>	<p>Ensure that detailed policies or plans for specific centres take account of age issues.</p>

	approach; all of which will take account of equality issues.		
Policy 8 – Housing Size, Mix and Choice	<p>Positive impact from provision of affordable housing although delivery issues due to economic climate.</p> <p>Only providing a proportion of lifetime homes may not sufficiently promote equalities</p> <p>Positive impact from provision of a mix of dwelling types including starter homes and homes to allow downsizing.</p> <p>Positive impact from rebalancing of areas with large numbers of HMOs to deliver sustainable communities.</p>	No change	Amend policy to provide all new dwellings to the lifetime homes standard
Policy 10 – Design and Enhancing Local Identity	Positive impact from high design standards including reducing opportunities for crime and ensuring new developments are inclusive.	No change	No change
Policy 12 – Local Services and Healthy Lifestyles	Positive impact from provision of accessible services	No change	No change
Policy 14 – Managing Travel Demand	The need to fully address existing accessibility deficiencies as part of the prioritisation of new development process will result in positive improvement	No change	Ensure that the implementation of the approach has regard to the needs of people with mobility difficulties.
Policy 16 – Green Infrastructure, Parks and Open Space	<p>Positive impact from increased provision of GI.</p> <p>Positive impact from reference in policy to ensuring that GI is as “<i>inclusive as possible</i>” although monitoring this will be important.</p>	No change	No change

Religion

Policy	Impact on Religion	Outcome of Impact Assessment	Suggested Action
Policy 5 - Nottingham City Centre	Positive impact on personal safety and access to services.	No change	No change
Policy 6 – The Role of Town and Local Centres	Positive impact on personal safety and access to services. Positive impact from reference to access improvements taking account of equality issues	No change	No change
Policy 8 – Housing Size, Mix and Choice	The ability to deliver affordable housing alongside other requirements, taking into account broad assessments of viability, may impact on religious developments	No change	Ensure religious considerations are part of design process.
Policy 10 – Design and Enhancing Local Identity	Positive impact from requirement to have regard to important local features including religious character.	No change	No change
Policy 12 – Local Services and Healthy Lifestyles	Positive impact from provision of accessible services	No change	No change
Policy 13 – Culture, Sport and Tourism	Positive impact from provision of cultural assets	No change	No change
Policy 16 – Green Infrastructure, Parks and Open Space	Positive impact from increased provision of religious GI, for example, churchyards. Positive impact from reference in policy to ensuring that GI is as “ <i>inclusive as possible</i> ” although monitoring this will be important.	No change	No change

Sexual Orientation

Policy	Impact on Sexual Orientation	Outcome of Impact Assessment	Suggested Action
Policy 5 - Nottingham City Centre	Positive impact on personal safety and access to services and employment through continued reference to safety throughout the policy.	No change	No change
Policy 6 – The Role of Town and Local Centres	Positive impact on personal safety and access to services and employment. Positive impact from reference to access improvements taking account of equality issues	No change	No change
Policy 10 – Design and Enhancing Local Identity	Positive impact from high design standards including reducing opportunities for crime and ensuring new developments are inclusive	No change	No change
Policy 12 – Local Services and Healthy Lifestyles	Positive impact from provision of accessible services	No change	No change
Policy 16 – Green Infrastructure, Parks and Open Space	A requirement that new or enhanced Green Infrastructure corridors and assets should be as inclusive as possible will have a positive impact	No change	No change

Marriage & Civil Partnership

No Policies were thought to be relevant to Marriage & Civil Partnership as there is no spatial element to the distribution and the built and natural environment has very little impact on this group.

Action Plan

The Action Plan stage pulls together the suggested changes from the impact assessments carried out for each of the policies relevant to the protected characteristics and provides details of who is responsible for considering the change.

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

1. No change – 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. Adjust the policy to remove the barriers or better promote equality – the impact assessment demonstrates that the policy can be amended by either removing the elements which cause the discrimination or adding elements to mitigate any negative impact or further promote equality.
3. Continue with the policy despite potential for adverse impact or missed opportunities to promote equality – 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. Stop and remove the policy – if the policy shows actual or potential unlawful discrimination it must be stopped and removed or changed.

'Due regard' must be given to the recommendations of the Equality Impact Assessment. However, 'due regard' does not mean that a change needs to be made but that appropriate weight needs to be given to the matter. Other issues, such as viability or the need to deliver development for economic or regeneration purposes may outweigh the equality considerations. In these cases the reasons should be robust and transparent.

In relation to Policy 8 after consideration it was decided not to make this change. Requiring the Lifetime Homes standard increases the build cost of a new dwelling. This may have an impact on the viability of development and will need to be considered along with the other factors which affect cost and viability such as the requirements for the Code for Sustainable Homes, S106 requirements, Community Infrastructure and other costs. These matters will be dealt with by the individual authorities involved in the Aligned Core Strategies work through later work they undertake. Given that viability and priorities will differ between the Local Authorities and also within their areas it was decided that it was not appropriate for the Aligned Core Strategy to set specific targets for the provision of Lifetime Homes or other similar issues.

However, policy does require new housing to provide a proportion of homes capable of being adapted to suit the lifetime of its occupants, to be defined in subsequent Development Plan Documents. This locally-based approach will be able to take account of local evidence of the viability impacts.

Details of the results of the consultation on the Phase 2 Equality Impact Assessment can be found in the Report of Representation (February 2013).

Policy	Summary of Phase 3 Scoping Stage	Outcome of Impact Phase 3 Assessment	Action	Recommended targets and/or monitoring indicators
Policy A – Presumption in Favour of Sustainable Development	No Impact Assessment required.	No change	None	None specific to Equalities
1 Climate Change	Medium Relevance <ul style="list-style-type: none"> • Age • Disability 	No change	None	Impact monitored through building/design process. No specific indicators for the ACS
2 Spatial Strategy	No Impact Assessment required.	N/a	None	Site/area specific assessments
3 Green Belt	No Impact Assessment required.	N/a	None	None specific to Equalities
4 Employment Provision and Economic Development	High Relevance: <ul style="list-style-type: none"> • Race • Gender, Gender Reassignment, Pregnancy and Maternity <p>Medium relevance</p> <ul style="list-style-type: none"> • Disability 	No change	None	Improvement in accessibility of employment sites Improvement in economic activity by ethnic group, gender and disability (available through Census but only every ten years)

	<p>Low Relevance</p> <ul style="list-style-type: none"> • Age • Religion • Sexual Orientation • Marriage and Civil Partnership 			
5 Nottingham City Centre	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Gender, Gender Reassignment, Pregnancy and Maternity • Age • Race • Disability • Religion • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership 	No change	None	<p>Equality assessment of centre specific work.</p> <p>Purple Flag status</p>
6 The Role of Town and Local Centres	<p>Medium relevance:</p> <ul style="list-style-type: none"> • Gender, Gender Reassignment, Pregnancy and Maternity • Age • Race • Disability • Religion • Sexual Orientation 	No change	None	<p>Equality assessment of centre specific work.</p> <p>% of Town Centres gaining Purple Flag status</p>

	<p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership 			
7 Regeneration	No Impact Assessment required.	N/a	None	Site/area specific assessments
8 Housing Size, Mix and Choice	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender, Gender Reassignment, Pregnancy and Maternity • Disability • Age <p>Medium relevance</p> <ul style="list-style-type: none"> • Race • Religion <p>Low Relevance</p> <ul style="list-style-type: none"> • Sexual Orientation • Marriage and Civil Partnership 	Amend the policy	Ensure that all new dwellings are built to Lifetime Homes Standard	<p>Number of Affordable Homes built.</p> <p>% of Homes built to Lifetime Homes standard</p>
9 Gypsies, Travellers and Travelling Showpeople	<p>High Relevance:</p> <ul style="list-style-type: none"> • Race <p>Low Relevance</p> <ul style="list-style-type: none"> • Gender, Gender Reassignment, 	No change	None	Number of additional pitches provided.

	Pregnancy and Maternity <ul style="list-style-type: none"> • Age • Disability • Religion • Sexual Orientation • Marriage and Civil Partnership 			
10 Design and Enhancing Local Identity	High Relevance: <ul style="list-style-type: none"> • Gender, Gender Reassignment, Pregnancy and Maternity • Disability • Age Medium relevance: <ul style="list-style-type: none"> • Race • Religion • Sexual Orientation Low Relevance <ul style="list-style-type: none"> • Marriage and Civil Partnership 	No change	None	% of new dwellings meeting required standards
11 Historic Environment	Low Relevance: <ul style="list-style-type: none"> • Age • Disability • Gender/Gender Reassignment/Pregnancy and Maternity • Religion 	N/a	None	None specific to Equalities

	<ul style="list-style-type: none"> • Race • Sexual Orientation • Marriage and Civil Partnership 			
12 Local Services and Healthy Lifestyles	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender, Gender Reassignment, Pregnancy and Maternity • Disability • Age • Religion <p>Medium relevance:</p> <ul style="list-style-type: none"> • Race • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership 	No change	None	Improved accessibility of identified services/facilities
13 Culture, Sport and Tourism	<p>Medium relevance</p> <ul style="list-style-type: none"> • Race • Religion <p>Low Relevance</p> <ul style="list-style-type: none"> • Gender, Gender Reassignment, Pregnancy and Maternity 	No change	None	Accessibility of identified services/facilities improved

	<ul style="list-style-type: none"> • Age • Disability • Sexual Orientation • Marriage and Civil Partnership 			
14 Managing Travel Demand	<p>High Relevance:</p> <ul style="list-style-type: none"> • Gender, Gender Reassignment, Pregnancy and Maternity • Disability • Age <p>Medium relevance</p> <ul style="list-style-type: none"> • Race • Religion • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership 	No change	None	Equality assessment work on specific transport schemes
15 Transport Infrastructure Provision	No Impact Assessment required.	N/a	None	None specific to Equalities
16 Green Infrastructure, Parks and Open	<p>Medium relevance</p> <ul style="list-style-type: none"> • Gender, Gender Reassignment, Pregnancy and Maternity 	No change	None	Equality assessment of GI Asset specific work.

<p>Space</p>	<ul style="list-style-type: none"> • Age • Race • Disability • Religion • Sexual Orientation <p>Low Relevance</p> <ul style="list-style-type: none"> • Marriage and Civil Partnership 			<p>% of parks gaining Green Flag status</p>
<p>17 Biodiversity</p>	<p>No Impact Assessment required.</p>	<p>N/a</p>	<p>None</p>	<p>None specific to Equalities</p>
<p>18 Infrastructure</p>	<p>No Impact Assessment required.</p>	<p>N/a</p>	<p>None</p>	<p>None specific to Equalities</p>
<p>19 Developer Contributions</p>	<p>No Impact Assessment required.</p>	<p>N/a</p>	<p>None</p>	<p>None specific to Equalities</p>