

Equality Impact Assessment Template

November 2024





Equality Impact Assessment Template



Simple Guide and tips

An Equality Impact Assessment (EIA) will help you analyse your policies and practices to make sure they do not discriminate or disadvantage people. However, EIAs also will help to improve or promote equality, access, participation in public life and good relations.

Your EIA should be started during the early stages of your project. Early consideration of equality matters will ensure that your policy, service or function will evolve in line with consideration of equality matters. However, not everything we do will have equality implications, only policies and practices that are relevant to equality need to be put in focus. If you decide after an initial assessment that a policy or practice is not relevant to equality then you should make a note of this. When completing a full EIA make certain the assessment is proportionate to the matters at hand. An EIA is not an end in itself – it is simply a way of ensuring and showing that due regard has been paid to our equality duty.

Where final decisions are made by councillors, in order to show that due regard has been given to the three aims of the equality duty at the time the decision is made, your assessment may need to be included within the report for Committee. The significance of your policy or practice to equality matters may help you make this decision.

All equality impact assessments are based around four core questions. There may well be others that contribute to the assessment, but the core ones remain throughout.

1. **What is the purpose of the policy?**
2. **How is it seeking to achieve this?**
3. **Who benefits and how? (and who, therefore, doesn't and why?)**
4. **What are any 'associated aims' attached to the policy?**



Sections 1 to 3 need to be completed in order to make an initial assessment

Section 4 onwards need to be completed for a full assessment

Stage 1 EIA Tracking ⁱ	
Title of EIA	Proposed Submission Local Plan (Regulation 19 Consultation Stage) Equalities Impact Assessment
Lead Officer	Ian Mawer
Division	Planning
Publication Date <i>(if applicable)</i>	November 2024

EIA Review Date <i>(only applicable when completing the full EIA)</i>	Regulation 19 Draft Local Plan Consultation
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Stage 2 Details of Policy, Service or Functionⁱⁱ

Provide an overview of the policy, service or other function being introduced or reviewed.

Please include the aim or purpose of the policy, service or function etc., any context, changes proposed and the desired outcome. You will need to start to think about the equality implications and whether there is potential for impact on residents, service users and staff (as applicable) with one or more of the protected characteristics.

Background

The Borough Council is in the process of preparing a new Borough-wide Local Plan. The current Local Plan sets out local planning policy that directs development within the Borough. It currently comprises of the Borough Core Strategy (2007); Plan E Epsom Town Centre Area Action Plan (2011); and the Development Management Policies Document (2015).

Aim of the new Local Plan

This document is the Proposed Submission Local Plan of that will replace the existing Local Plan upon adoption. Our current Local Plan timetable (the [Local Development Scheme](#)) envisages the Local Plan being adopted in Spring 2026.

The Proposed Submission Local Plan includes new strategic policies, development management policies and site allocations. It seeks to deliver planned-for growth that meets the housing need, economic development needs including retail and employment floorspace, and infrastructure requirements to support future growth. The Local Plan will cover the period from 2022 until 2040.

Proposed changes

It is a statutory requirement to have an up to date Local Plan for the Borough. National policy requires that plans are reviewed at least once every 5 years. The new Local Plan includes new strategic policies, development management policies and site allocations to direct future development in the Borough. The Plan includes policies on housing provision to meet a range of needs. There are policies on housing standards, environmental standards and design standards for buildings and spaces. It includes policies that support future economic needs and infrastructure provision in line with the projected growth. Altogether these policies will ensure a sustainable level of future development having regard to the environmental and other physical constraints, that meet a range of needs of the existing and future population.

The local plan will comprise of taking forward existing requirements where they remain up to date as well as the formation of new policies on new topic areas. The policies are based on numerous evidence base documents that have been commissioned to support policy formation. The main changes will include the following:

- Policies that will support the level of housing, economic and infrastructure provision to meet the needs of the community
- Up to date standards, including environmental, building and design standards that are based on national standards or evidence base.
- Proposed sites to be allocated for future development to meet future needs
- Policies that support the protection and conservation of the environment whilst supporting growth and change.



- Policies on climate change, biodiversity, flooding, landscape and green infrastructure.

Potential Impact

The Local Plan comprises a range of topic areas and has the potential to have wide ranging impacts. The policies are evidence based to ensure they are robust and justified. The policies take into account the population and the demographic makeup of Epsom and Ewell, as well as future projections based on national statistics.

In addition to this Equalities Impact Assessment, planning legislation The Planning and Compulsory Purchase Act requires local planning authorities to carry out a Sustainability Appraisal (SA) for each proposal in the Local Plan. The purpose of the sustainability appraisal is to appraise the social, environmental and economic effects of a plan. This has been carried out and will be published alongside the Proposed Submission Local Plan. A Habitats Regulations Assessment (HRA) has also been carried out to test if a plan could significantly harm the designated features of a European site.

The Proposed Submission Local Plan will be of interest to anyone who has an interest in the development of land in the Borough specifically developers and landowners. However, the impact of the Plan may also be of interest to the general population living within or who would like to move to Epsom and Ewell in the future as it will guide decisions affecting their interests.

The areas where there are potential equalities issues relate to policies on housing and infrastructure provision and accessibility. This may affect the protected characteristics age, disability and race.

The Local Plan identifies there is a need for the provision of sites for gypsies, travellers and travelling showpeople however the full housing need can not be met and will need to be met on unallocated land through the planning application process. Specific engagement may be required during the consultation process, to ensure equality of opportunity in the shaping of emerging policy.

The evidence base Housing Economic Development Needs Assessment HEDNA has identified an ageing population and the requirement for different housing types and tenure to meet various needs. This has led to the development of policies to deliver an appropriate range of housing and accommodation with care. Emerging policies seek to improve the accessibility of new development and the suitability of new housing for people with disabilities and/or particular needs associated with old age.

Officers have carefully considered the content of the Proposed Submission Local Plan from an equalities perspective and having regard to protected characteristics. Officers do not believe that any of these characteristics are unfavourably impacted by the Proposed Submission Local Plan.



<p>Indicate whether the policy, function or service change etc. outlined in Stage 2 above has the potential to impact on people with a protected characteristic (covers service users, the wider community and staff).</p> <p>If yes, a full EIA needs to be completed (<i>please go to Stage 4</i>).</p> <p>If no, please set out your reasoning and then secure sign-off by your Head of Service and the Inclusion and Diversity Group at Stage 8.</p>	<p>The fundamental objective of the Proposed Submission Local Plan is to ensure that the borough grows in a sustainable and inclusive manner – with opportunities for housing, employment, retail, travel, education, healthcare, health and well being, open space and leisure. The Local Plan aim is to shape the future growth of the borough and will consequently, impact on its residents and future residents, and therefore has the potential to impact all who are defined as having protected characteristics.</p> <p>The initial assessment of the changes identified and the potential impact for people with a protected characteristic are detailed in the Stage 5 below</p>
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Stage 4 Data Relevant to Full EIA^{iv}

List all data (including source) and other information relevant to the full equality impact assessment

Key Data Sources:

- Local Plan Evidence Base – as required by national planning policy. This includes a variety of statistical and qualitative evidence sources relating to housing need; gypsy and traveller accommodation needs; employment; retail, climate change and transport and other topic areas. The evidence base also considers the potential financial impacts of the emerging policies – specifically whether they could make new development unviable. The Local Plan Evidence Base can be found at the following [link](#).
- National datasets – including data from the ONS and from national organisations such as the Homes England. Also, key evidence outputs from [the OAHN standard method](#) and the related [Housing Delivery Test](#).
- Sustainability Appraisal Report – a multi-stage appraisal of all the options considered during the development and preparation of the Draft Local Plan. This includes assessments on potential impacts on natural and built environment and accessibility. Elements of this appraisal process have fed directly into this assessment.

Specify all engagement activities undertaken

As a statutory planning policy document, the new Local Plan is subject to a number of statutory public consultation stages throughout its development and preparation. The council has actively engaged with a wide variety of stakeholders and partners who have an interest in the new Local Plan. This has included engagement with internal partners (Including Members); the development industry (through an on-going call-for-sites process); Duty to Co-operate partners (including neighbouring authorities and the Greater London Authority); infrastructure partners (including education providers); and local community groups. This on-going process has supported the production of the evidence base that has informed the new Local Plan.

In February and March 2023, the Council undertook public consultation in accordance with Regulation 18 of the Town & Country Planning Regulations on a full Draft Local Plan containing a spatial strategy, site allocations and a range of strategic and development management policies. Engagement included the use of a variety consultation media both physical and digital, including leaflets, FAQs and social media platforms. Officers also attended a number of face to face consultation events at various locations around the borough, engaging with the community directly. The Council made a proportionate effort to ensure that organisations representing the nine equality strands (as set out in stage 5 of this document) were given the opportunity to be involved. Comments made during this consultation fed into the development of the next version of the emerging Local Plan. Which is the subject of this next round of consultation.

The Proposed Submission Local Plan will be subject a further statutory public consultation in accordance with Regulation 19 of the Town & Country Planning Regulations prior to the submission of the new Local Plan to the Secretary of State for examination, Those responding to this consultation are now required to explicitly state whether they find the new Local Plan sound or unsound – specifying the reasons why they consider the new Local Plan and its constituent policies and site allocations unsound. Consultation response submitted at that stage of the process will be collated and submitted to the Secretary of State for consideration through the subsequent examination process.



Following the Regulation 19 consultation stage the draft new Local Plan will be submitted for examination in public by an Inspector appointed by the Secretary of State. The Inspector will consider this assessment and the potential equality impacts of the new Local Plan. During the examination process there will be a further opportunity for people/ organisations to engage with the process – most notably during the public hearing but also by way of the major modifications process - subject to such modifications being introduced following the public hearing.

In addition to the above, the new Local Plan is also the subject of a Sustainability Appraisal Report, which provides an assessment of each policy against an agreed suite of sustainability objectives. The Sustainability Appraisal Report is also subject to consultation. Comments made to that process are used to further develop the policy content.

The Statement of Community Involvement 2022 sets out how the public consultation will be undertaken and the potential communication methods that will be used.



Stage 5 Impact on Residents, Service Users and Staff with Protected Characteristics^v

Undertake a full analysis which details all positive and negative impact arising from the policy, service or other function. If there will be no impact, make this clear by completing the relevant box. Please ensure that you evidence your conclusions with reference to the appropriate source.

Protected Characteristic	Potential Positive Impact	Potential Negative Impact	No Impact
Age	<p>The Proposed Submission Local Plan has the potential to benefit a number of different age groups through advancing equality of opportunity. Planned development will generate funds through the Community Infrastructure Levy, which will help to support investment in health, education and community infrastructure where required.</p> <p>The Proposed Submission Local Plan contains policies that support the growth and extension of community establishments including educational facilities, health centres and community halls which cater to a wide age range.</p> <p>The evidence base for the Local Plan includes evidence about needs for specialist housing, which has informed a policy framework to guide the development of a variety of housing and accommodation with care, to meet the needs of an ageing population. Other policies include introduction of optional building regulations to improve the accessibility, adaptability and suitability of new dwellings for wheelchair users, which is likely to be of benefit to people who develop mobility problems due to old age.</p> <p>New policies that seek to respond to the housing need identified for the Borough could benefit a wide range of age groups. For example, by providing affordable</p>		



	<p>accommodation for young people or delivery of appropriate housing for elderly people, including close care accommodation. This may lead to the release of family sized housing onto the market to meet demand from that demographic.</p> <p>By seeking to secure investment in infrastructure the Proposed Submission Local Plan will ensure that future growth is inclusive to all age groups. Whether that be in terms of providing opportunities in employment; education; healthcare; travel; and open space provision (among many possible examples).</p>		
<i>Disability</i>	<p>The evidence base for the Local Plan includes evidence about needs for specialist housing which has informed policy for the introduction of optional building regulations to improve the accessibility, adaptability and suitability of new dwellings for wheelchair users, which is likely to be of benefit to people with mobility issues.</p> <p>Other complimentary planning policies, including those relating to meeting specific housing needs, meeting residential space standards and the delivery of inclusive good quality design (specifically for housing but equally for other forms of growth and infrastructure provision) will ensure that future growth is accessible to all.</p>		
<i>Gender Reassignment</i>			The Plan is neutral with respect to equality issues relating to gender reassignment.
<i>Pregnancy and Maternity</i>			The Plan is neutral with respect to equality issues relating to pregnancy and maternity.



<p><i>Race</i></p>			<p>The Proposed Submission Local Plan makes provision for gypsy and traveller accommodation, although, the full needs will not be met in full through the sites allocation process and some of this need can be met through the planning application process.</p> <p>Whilst the Plan will make provision for a mix of housing and other development needs that will reflect a range of need, it is the case that the overall housing need in the borough, including conventional and specialist accommodation cannot be met in full in the draft Local Plan site allocations. This affects all groups in the Borough rather than having a particular impact on one group.</p>
<p><i>Religion and Belief</i></p>	<p>The Proposed Submission Local Plan supports development and extension for community uses including places of worship in sustainable locations such as the retail centres.</p>		
<p><i>Sex</i></p>			<p>The Plan is neutral with respect to equality issues relating to sex.</p>
<p><i>Sexual Orientation</i></p>			<p>The Plan is neutral with respect to equality issues relating to sexual orientation</p>
<p><i>Marriage and Civil Partnerships</i></p>			<p>The Plan is neutral with respect to equality issues relating to marriage and civil partnership.</p>



Stage 6 Decision^{vi}

Specify the full details of your decision.

Include any changes made to the proposal, steps taken to eliminate or minimise any negative impact(s), any additional mechanisms put in place to meet the needs of particular groups or to help foster good relations etc.

The Proposed submission Local Plan identifies a proposed strategy, planning policies and new site allocations to meet the needs of a range of people in terms of housing, jobs, education providers, and retail. Overall the analysis in stage 5 demonstrates a positive policy response in equality terms. The only potential negative impact identified is that it does not meet the overall housing needs of the borough through sufficient site allocations, including the full accommodation needs of the gypsy and traveller community, however this is the same case reflected for the overall housing needs and therefore is not considered negative impact or targeted to a specific group.

Overall, the benefits are associated with equality of opportunity through increasing the provision and the types of housing and accommodation to meet the range of needs reflective of the population; ensuring a range commercial development continues to grow to maintain a prosperous local economy and that continued investment leads to additional social infrastructure health, education and community infrastructure to meet the range of needs of the borough's residents. On that basis it is not considered necessary to take any further actions.


Stage 7 EIA – Action Plan^{vii}

Please specify any action that will be taken to support implementation of your decision

Issue Identified	Action required	Implementation Date	Responsible Officer
None	None required	N/A	N/A

Stage 8 EIA Sign Off^{viii}



Head of Service: 	Date: 11/11/24
Inclusion & Diversity Group:	Date:

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- i **Stage 1 - EIA Tracking**
Insert appropriate details. A review date will only be required when completing the full equality impact assessment (Stages 1 – 8).
- ii **Stage 2 - Details of Service / Policy / Function to be assessed**
In this section you will need to provide information which explains the subject matter of the work you are undertaking. If a new policy is being developed then explain what the policy covers and what it sets out to achieve. If a policy is being reviewed, then once again explain what the policy addresses and highlight any changes that are being introduced. If the work you are undertaking involves a service change, outline what the current service provides and to whom, then discuss the changes that are proposed and what the outcome of these service changes are anticipated to be. Bear in mind when drafting this section (and the rest of the document) that a lay person, unfamiliar with the subject matter should be able to read it and understand the policy, function or service and any changes that are proposed.
- iii **Stage 3 – Relevance Check**
The relevance check asks you to complete an initial assessment of whether the new / reviewed policy, service or function proposed is anticipated to impact upon residents, service users or staff with a protected characteristic. If you consider that there will be some form of impact then you must go on to complete all other stages of the form (Stages 4 – 8 inclusive). If, however, there will be no impact, provide your justification in the space provided and seek formal sign off of your assessment (Stage 8). The form should then be kept in case you need to provide evidence at a later date that you had due regard to the three aims of the equality duty during policy development / service design. If you have any uncertainty at this stage of the process, go on to complete all sections of the Equality Impact Assessment Template (Stages 1-8).
- iv **Stage 4 - Data Relevant to Full EIA**
In order to undertake a full assessment of the equality implications associated with your project/work you will need to outline the data that you possess which will help you to understand any resultant impact. If you identify any gaps in your information, and thereby have gaps in your understanding, you will need to fill these areas of uncertainty by exploring what other sources of information there are and/or by talking to different



groups/bodies. It may be possible to consult with relevant groups. If you undertake any engagement activities you will need to set them out in this section. Please speak to the Consultation Team in Policy, Performance and Governance if you are considering undertaking consultation.

v

Stage 5 - Impact on Residents, Service Users and Staff with Protected Characteristics

Using the information that you have set out at stage 4 you now need to consider carefully whether the new or revised policy, service or other function etc. will impact upon people with a protected characteristic in a positive or negative way. You will need to consider service users, residents and staff (as appropriate). Set out your considerations for each protected characteristic in the appropriate column. If no impact will arise, please indicate this in the appropriate box to show that you have given due regard to equality. When undertaking this assessment make sure you bear in mind the different forms of discrimination, e.g. direct and indirect discrimination, discrimination by association or perception. The protected characteristic 'marriage and civil partnership' needs only to be considered in relation to the first aim of the equality duty – the need to eliminate unlawful discrimination, harassment and victimisation...

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Stage 6 – Decision

This section requires you to make and evidence your decision. Use your analysis undertaken in Stage 5 together with other relevant factors such as financial implications. The importance that you give equality considerations when making your decision should be proportionate to the significance of the policy, service or function on advancing equality of opportunity and in fostering good relations. Be mindful that your decision could be challenged, the Equality Act 2010 requires you to 'give due regard' to the three aims of the public sector equality duty. A strong evidence base and transparency will lead to effective decision making.

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Stage 7 – Action Plan

In the Action Plan set out any actions that you plan to implement to support your policy, service delivery or change etc. You will need to set a completion date and name a responsible officer. These actions may comprise some form of positive step(s) to support the needs of a particular group or step(s) which will negate any impact on a particular group.

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Stage 8 – EIA Sign Off

This section must be completed by the relevant Head of Service and a copy sent to HRAdmin@epsom-ewell.gov.uk when finishing your assessment at Stage 3 – Relevance Check or when completing the full equality impact assessment, Stages 1-8.

Further information is available from:

['Equality Impact Assessment Introduction and Appendices'](#) .

['Meeting the Equality Duty in Policy and Decision-Making England'](#)

If you need further assistance please speak to a member of the Inclusion and Diversity Group