



**TEWKESBURY BOROUGH PLAN:
Pre-Submission
Regulation 19 Consultation**

**EQUALITY AND DIVERSITY IMPACT
ASSESSMENT
SCREENING REPORT**

July 2019

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Tewkesbury Borough Council Tewkesbury Borough Plan: Pre-Submission Regulation 19 Consultation

Equality and Diversity Impact Assessment Screening Report

July 2019

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1.0 Introduction

Background

- 1.1 The Report sets out the process and results of a screening assessment for an Equality and Diversity Impact Assessment (EqIA) of the Draft Tewkesbury Borough Plan (TBP). The TBP sets out the spatial Vision, Objectives and Policies to guide and manage identified development needs; it includes preferred local options for site allocations and has been prepared with regard to the Sustainable Community Strategy for Tewkesbury Borough 2008-2028. Enfusion Ltd has been commissioned to carry out the screening on behalf of the Council and as part of the integrated Sustainability Appraisal (SA) of the emerging Borough Plan.

The Gloucester, Cheltenham & Tewksbury Joint Core Strategy (JCS) & the Tewkesbury Borough Plan (TBP)

- 1.2 The GCT Joint Core Strategy (plan period to 2031 and adopted December 2017¹) sets out the housing and employment needs for the Tewkesbury Borough area including the strategic direction for development growth with strategic policies. The Tewkesbury Borough Plan, covering the administrative area of Tewkesbury borough, is part of a hierarchy of planning guidance, sitting underneath the higher level Joint Core Strategy and national planning guidance. The TBP has been prepared using a range of evidence and taking into account responses to consultation with communities, public, developers, and the relevant regulators. It is based on research into the characteristics of the Borough area, relationships with adjoining areas, past trends and future predictions.

SA and EqIA

- 1.3 Under the Equality Act 2010, public authorities such as Tewkesbury Borough Council must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act
 - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic
 - Foster good relations between people who share a characteristic and those who do not share a characteristic
- 1.4 An EqIA is a tool that seeks to improve the work of the Council and help ensure that the requirements of the Equality Act 2010 are met. The assessment of equality, diversity, and health/well-being (which is an important aspect of equality) has been detailed through the integrated Sustainability Appraisal (SA) process. All elements of the emerging Draft TBP have been appraised against a SA framework including several SA objectives that directly and

¹ <https://jointcorestrategy.org/>

indirectly address equality, health and diversity: No.1 – Housing; No.2 Economy & Employment; No. 3 Healthy Communities; No. 4 Accessibility to Services (including health & education); No. 5 Accessibility to Public Transport; No. 7 Air Quality; No. 11 Landscape; and No. 12 Cultural Heritage. The summary findings of this EqlA have been integrated into the SA of the Draft TBP and are provided separately as Appendix VII to the Draft SA Report.

Consultation

- 1.5 An initial EqlA Screening Report was published alongside the initial SA Report with the Tewkesbury Borough Plan Draft Policies & Site Options (2015) for public consultation in early 2015. There were no comments received specifically on the EqlA; comments made on the draft plan and the SA Report have been taken into consideration in the next stages of plan-making and assessment.
- 1.6 A revised EqlA Screening Report on the Draft TBP Preferred Options was published as part of the SA Report (August 2018) for Revised Regulation 18 consultation. No comments were received on the EqlA.

Purpose & Structure of Report

- 1.7 The purpose of this Screening Report is to determine whether the TBP is likely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and whether a full EqlA is required.
- 1.8 This report is structured to demonstrate compliance with the requirements of the Equality Act. Following this introductory section, the Report is organised into three further sections:
 - Section 2 summarises the requirements of the Equality Act 2010 and the purpose of EqlA
 - Section 3 - outlines the screening process and the findings of the screening assessment
 - Section 4 - summarises the findings of the EqlA and sets out the next steps, including consultation arrangements

2.0 Equality and Diversity Impact Assessment: Equality Act 2010 Requirements

- 2.1 The Equality Act came into effect in October 2010 with the aim of harmonising all extant discrimination law and strengthening the laws that prevent discrimination. The Equality Act applies to the provision of services and public functions, and thus includes the development of local authority policies and plans. The Act maintains the protection provided by previous legislation and thus prevents discrimination on the basis of nine protected characteristics (previously referred to as equality strands): age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 2.2 Inequality can exist in a variety of forms and for land use and development planning, this can include inadequate provision of and access to services (health, food stores, education facilities), good quality homes, employment opportunities, a healthy living environment, and transport infrastructure (roads, pavements, public transport) - for all members of society.
- 2.3 In summary, public authorities must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.
 - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
 - Foster good relations between people who share a characteristic and those who do not share a characteristic.
- 2.4 The Equality Act does not specify how public authorities should analyse the effects of their existing or new policies in relation to equality but doing so is an important part of complying with the general duty. The approach in this Report reflects the principles of the Equality Framework for Local Government², as applied across Gloucester, Cheltenham and Tewkesbury, other guidance provided by the Department of Health, and in conformity with the EqlA and SA undertaken for the GCT JCS.
- 2.5 An EqlA is a tool that seeks to improve the work of a Council and helps ensure that the policies and plans it develops do not discriminate in the way services and employment are provided. Also, where possible the Council does as much as it can to advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not.
- 2.6 The methods and approach used for this assessment involve the following stages, as outlined in Table 2.1, as follows: This Report presents the method and findings for Stage 1 of the assessment - screening.

² Equality and Human Rights Commission (2009) Equality Impact Assessment Guidance. Online at <http://www.equalityhumanrights.com/about-us/equality-and-diversity/our-assessments-of-impact/>

Table 2.1: Equality and Diversity Impact Assessment: Key Stages	
Stage 1	
Screening for Equality and Diversity Impact Assessment	<ul style="list-style-type: none"> ■ Identify the main purpose and aims of strategy/plan. ■ Identify other plans, programmes and assessments that have influenced the strategy/ plan in relation to equality. ■ Provide baseline information on issues and needs related to each protected characteristic or person. ■ Assess the impacts of the strategy/ plan on the protected characteristics or persons.
	<ul style="list-style-type: none"> ■ <i>If no negative effects are likely then no further assessment will be required.</i> ■ <i>If there are effects are judged likely or uncertainty exists which cannot be easily mitigated – the precautionary principle applies proceed to Stage 2</i>
Stage 2	
Full Equality and Diversity Impact Assessment	<ul style="list-style-type: none"> ■ Complete additional baseline and research. ■ Agree scope and method with wider [public] stakeholders as necessary. ■ Assess strategy/plan in greater detail. ■ Provide recommendations to mitigate negative impacts. ■ Develop measures to monitor, evaluate and review (including timescale and mechanisms) the recommendations. ■ Report outcomes of EqlA and consult with wider [public] stakeholders as necessary. ■ Finalise EqlA following responses from public and implement.

3.0 Equality and Diversity Impact Assessment: Stage 1 Screening

Approach to Equality and Diversity Impact Assessment Screening: Key Tasks

- 3.1 EqlA typically involves two stages - as outlined previously in Table 2.1. This Report sets out our approach and findings for Stage 1, to determine whether the Draft TBP is likely to have negative effects on protected characteristics or persons identified under the Equality Act 2010, and thus whether a full EqlA would be required.
- 3.2 The process of Screening can be broken down into four main task areas, as set out in more detail below:

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

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

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

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

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

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

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

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

Task 1: Identify the main purpose and aims of strategy/plan

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

- 3.3 The TBP sets out the Council's approach to meeting the non-strategic housing and employment needs established for the Borough through the higher-level Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (JCS) for the plan period up to 2031. It also sets out the Council's detailed policies for managing development. When adopted, the TBP will form a key part of the development plan for Tewkesbury Borough, and alongside the JCS, will be used to guide decision-making on planning applications.
- 3.4 The higher-level GCT JCS has also been subject to EqlA Screening during its preparation. The Screening Report³ (September 2013) concluded that the components of the Submission JCS will lead to positive effects on the protected characteristics and that there were no negative effects identified. The JCS contains Strategic Objective No. 9 to promote healthy communities and this includes the aim for reducing inequalities. The TBP has been prepared to be in conformity with the JCS and including compliance with equality requirements.
- 3.5 The TBP sets out how Tewkesbury Borough will meet its housing and employment needs with a Vision and Objectives as follows:

"Tewkesbury borough, a place where a good quality of life is open to all, where our environment and heritage assets are cherished, a sufficient supply of homes is available and where a thriving economy supports healthy and happy communities."
This will be achieved by ensuring that development is directed away from land at risk of flooding and high-quality landscapes/heritage assets and towards locations where the mix of land uses and proximity to existing facilities minimises travel distances and maximises transport choice.

- | |
|--|
| 1. Delivering a wide choice of quality homes (including market housing, affordable housing, sheltered accommodation and Gypsy and Traveller community pitches/sites). This criterion incorporates flexibility in terms of the 'choice' it seeks to provide and also includes provision of the necessary infrastructure |
| 2. Facilitating the reasonable development aspirations of residents and businesses in the borough, including providing opportunities for small and medium sized builders and those wishing to build their own homes, and supporting appropriate windfall sites through policies and decisions, whilst ensuring essential protection against harmful development. |
| 3. Promoting sustainable transport (including public transport, cycling, walking, issues around freight transport and use of the private motor vehicle). This also includes the provision of infrastructure and issues of connectivity within and between modes of transport |

³ <http://www.gct-ics.org/Documents/SustainabilityAppraisal/SA-Appendix-10-EqlA-Screening-Report2013.pdf>

4. Promoting healthy connected communities (including recreation, culture and religious needs [and closely linked to active modes of transport]). This also includes the provision of infrastructure
5. Supporting a prosperous and competitive economy (including employment and businesses in both existing settlements and rural areas). This also includes the provision of infrastructure
6. Sustaining rural towns and villages, recognising that housing is essential to ensure the retention and development of local services and community facilities
7. Conserving and enhancing the built and natural environment (including heritage assets, urban and architectural design, landscape, biodiversity – steering development away from designated areas to make most efficient use of land, which should be brown field sites where available and appropriate and developing coherent ecological networks that are more resilient to current and future pressures)
8. Meeting the challenges of climate change (including managing flood risk, energy efficiency, renewable energy and waste minimisation)

- 3.6 The TBP proposes new development in order to deliver the scale and distribution proposed in JCS Policies SP1 and SP2 of the Joint Core Strategy insofar as they relate to the need for development in Tewkesbury Borough outside the strategic allocations proposed in the JCS. Policy SP2 of the JCS requires Rural Service Centres to accommodate in the order of 1,860 new homes and the Service Villages to accommodate in the order of 880 new homes to 2031. Much of this development has already been committed. Based on the data in the JCS Housing Implementation Strategy (June 2017), the balance to be found is 19 dwellings at the Rural Service Centres and 110 dwellings at the Service Villages.
- 3.7 The TBP includes proposed site allocations for Tewkesbury Town and the rural areas and the local requirements that development in the TBP area will have to meet. The policies are as follows:

Housing

RES1 Housing Site Allocations
 RES2 Settlement Boundaries
 RES3 New Housing Outside Settlement Boundaries
 RES4: New housing at Small Rural Villages and Hamlets
 RES6: New Housing Development
 RES7 Reuse of Rural Buildings for Residential Use
 RES8 Subdivision of Existing Dwellings
 RES9 Replacement Dwellings
 RES10 Alterations and Extensions
 RES11 Change of Use of Agricultural Land to Domestic Garden
 RES12 Affordable Housing
 RES 13 Housing Mix
 RES14 Specialist Accommodation for Older People
 GTTS1 Site Allocations for Gypsies & Travellers

Economy & Tourism

EMP1: Major Employment Sites
 EMP2: Rural Business Centres

EMP3: Employment sites within settlement boundaries
EMP4: Rural Employment Development
EMP5: New Employment Development (General)
EMP6: Safeguarding of Employment Sites
AGR1: Agricultural Development
AGR2: Agricultural Diversification
AGR3: Agricultural and other rural workers dwellings
AGR4: Removal of occupancy conditions
TOR1: Tourism Related Development
TOR2: Serviced & Self-Catering Accommodation
TOR3: Caravan and camping sites
TOR4: Herefordshire & Gloucestershire Canal Restoration
TOR5: Gloucestershire Warwickshire Canal Restoration

Green Belt

GRB1 Green Belt Review
GRB2 Gloucestershire Airport
GRB3 Bamfurlong Operational Policing Site

Town Centres & Retail

RET1 Maintaining the Vitality & Viability of the Town, Borough & Local Centres
RET2 Tewkesbury Town Centre & Primary Frontages
RET3 Retail Centres
RET4 Out of Centre Developments
RET5 Single or Small Groups of Shops in Residential Areas
RET6 Hot Food Takeaways
RET7 Local Shops & Public Houses
RET8 Agricultural, Horticultural Retail in the Countryside
RET9 Tewkesbury Town Regeneration

Quality Places

DES1 Housing Space Standards
DES2 Street Signage & Furniture
DES3 Advertisements, Signs & Notice Boards
DES4 Shopfronts
HER1 Conservation Areas
HER2 Listed Buildings
HER3 Historic Parks & Gardens
HER4 Archaeological Sites & Scheduled Monuments
HER5 Locally Important Heritage Assets
HER6 Tewkesbury (1471) Historic Battlefield

The Natural Environment

LAN1 Special Landscape Areas
LAN2 Landscape Protection Zone
LAN3 Strategic Gaps
LAN4 Locally Important Open Spaces
LAN5 Local Green Spaces
NAT1 Biodiversity, Geodiversity & Important Natural Features
NAT2 The Water Environment
NAT3 Green Infrastructure: Building with Nature

NAT4 Tewkesbury Nature Reserve
NAT5 Cotswold Beechwoods
ENV1 Development near Sewage Treatment Works
ENV2 Flood Risk & Water Management
ENV3 Solar Farms

Communities, Health & Recreation

HEA1 Healthy & Active Communities
RCN1 Public Outdoor Space, Sports Pitch & Facility Provision
RCN2 New Sports & Recreational Facilities
RCN3 Allotments & Community Gardens
RCN4 Equine Facilities
COM1 Protecting Community Assets
COM2 Broadband Provision
COM3 Telecommunications
COM4 Neighbourhood Development Plans

Transport & Accessibility

TRAC1 Pedestrian Accessibility
TRAC2 Cycle Network & Infrastructure
TRAC3 Bus Infrastructure
TRAC4 High Frequency Bus Routes
TRAC5 Ashchurch for Tewkesbury Railway Station
TRAC6 M5 Junction 9/A46 Corridor
TRAC7 Tewkesbury Northern Bypass Corridor
TRAC8 Old Railway Line Tewkesbury
TRAC9 Parking Provision

Who implements or delivers the policy, service or function?

- 3.8 Tewkesbury Borough Council is responsible for implementing the TBP. The TBP is subject to consultation with wider (public) stakeholders who can influence the policies in the TBP.

Who will be affected by the strategy/ plan?

- 3.9 The TBP applies to the administrative area of Tewkesbury Borough Council. It will affect everyone who lives, works and visits this area.

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

- 3.10 Appendix I provides a summary of each plan, programme and the policies that have influenced the GCT JCS and the TBP in relation to equality. They include:

National

- National Planning Policy Framework (NPPF) (2012, revised 2018)
- Planning Policy for Traveller Sites (2015)

- Community Infrastructure Levy (2015)
- Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016 – 2021
- Public Health England, Global Health Strategy 2014 to 2019
- Natural England (2014)
- Green Infrastructure Guidance

Regional/Sub-regional

- Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Adopted 2017
- Leadership Gloucestershire
- Gloucestershire Children and Young People's Partnership Plan 2015-18
- Gloucestershire Health and Wellbeing Strategy 2012 – 2032 – Fit for the Future

Local

- The Sustainable Community Strategy for Tewkesbury Borough 2008 – 2028 (Refreshed November 2010)
- Tewkesbury Equality and Diversity Policy 2012-2016
- Gloucestershire and South Gloucestershire: Affordable Warmth Strategy 2013-2018
- Gloucester City Vision 2012 – 2022

Task 3: Review baseline data and research

- 3.11 The baseline was sourced from Gloucestershire Population Profile 2017 (Gloucestershire County Council, 2017) which is available online at <https://inform.gloucestershire.gov.uk/Resource.aspx?ResourceID=898&cookieCheck=true&JScript=1>. Given that these statistics have been collated to cover the nine protected characteristics or persons based on the most up-to-date information available under the Equality Act 2010, there are not considered to be any gaps in the data.
- 3.12 The following table summarises the equality and diversity trends in Gloucester, Cheltenham and Tewkesbury areas from Gloucestershire Population Profile 2017:
- **Age** – The population has increased in the area by 7% since 2005. Cheltenham and Tewkesbury have a lower population of 0-19 year olds than the national average and Gloucester's population in this age group is higher than the other two Councils. Tewkesbury is projected to see the greatest growth in 0-19 year olds until 2039. In addition, Tewkesbury has a much higher proportion of the population aged 65+ than Cheltenham, Gloucester and the national average. All the Local Authorities are moving towards an ageing population demographic.
 - **Marriage and civil partnership** – Gloucester and Tewkesbury have a lower proportion of people who are single when compared to the national average. In contrast the proportion of people who are married, divorced or widowed in Tewkesbury exceeds the national average.
 - **Pregnancy and maternity** - Gloucester has the highest proportion of births to mothers aged 20 or under, exceeding the county and the national

average. In Tewkesbury the highest percentage of births is for the age group 30-34, with a lower percentage of the population giving birth under the age of 20 than the national average.

- **Race** – The majority of Gloucester's, Cheltenham's and Tewkesbury's population is white. Black or Ethnic Minorities make up a very small percentage of their populations, which is considerable lower than the reported for England as a whole. Gloucester has the highest proportion of people from a Black or Ethnic Minorities compared to the other Councils. The proportion of people that are classified as Other White is higher in Cheltenham than England as a whole. The proportion of people that are classified a Caribbean and White and Black Caribbean is higher in Gloucester than England. Tewkesbury Borough has a large number of Gypsy, Travellers and Travelling Showpeople compared with other districts in Gloucestershire.
- **Religion or belief** - Gloucester and Tewkesbury have a higher proportion of Christians in their populations than the national average. Cheltenham has the highest proportion of Buddhists, Hindus and people who have no religion and Gloucester has the highest proportion of Muslims out of the three Councils.
- **Gender reassignment** - There are no official estimates of gender reassignment at either national or local level. However, in a study funded by the Home Office, the Gender Identity Research and Education Society estimate that somewhere between 0.6% and 1% of the UK's adult population are experiencing some degree of gender variance. This figure has been applied to all three Councils.
- **Sexual Orientation** - Estimates suggests that approximately 5 to 7 percent of the population in the three council areas identify as lesbian, gay or bisexual.
- **Gender** – Gloucester, Cheltenham and Tewkesbury have a slightly higher percentage of women to men in their populations than the national average.
- **Disability** - Gloucester, Cheltenham and Tewkesbury all have a lower percentage of their populations with long term limiting illness or disability than the national average.

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

- 3.13 The development of the JCS and the TBP have been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010. Furthermore, the adopted JCS itself contains an objective which specifically relates to addressing social inequality and inclusivity and providing for healthier and safer communities; the TBP has been prepared in the context of this higher level plan.
- 3.14 The TBP Vision, Objectives, and the Policies have been assessed to the same level of detail, taking into account the information gathered in Task 3 to establish any potential impacts on the protected characteristics or persons

identified under the Equality Act 2010. The full assessment is presented in Appendix II of this report.

- 3.15 A summary of the assessment for each component of the Draft TBP is provided below under each component heading.

Vision: The Vision is considered to lead to positive effects on all protected characteristics. It should benefit all groups as it aspires to be a place where a good quality of life is open to all. The aim for supporting health and happy communities will have positive effects on all groups improving their quality of life and meeting the needs of each group's distinctive and individual needs. Avoidance of development increasing the risk of flooding is particularly positive for specific social groups (the elderly, Travellers⁴ and disabled people) as they are more likely to be adversely affected by flood events.

Objectives: Generally, the Objectives will have a positive effect on all protected characteristics. In particular, 'Delivering a wide choice of quality homes'; 'Promoting sustainable transport'; 'Promoting healthy connected communities'; and 'Meeting the challenges of climate change' will have greater positive effects on all social groups by improving accessibility, providing buildings which will meet their needs and be of a good quality and also providing flexible and adaptable buildings and places that are resilient to climate change and flooding. None of the Objectives are biased towards one particular protected characteristic. 'Supporting a prosperous economy' will also promote positive effects on health and equality factors.

Tewkesbury Borough Plan Policies

- 3.16 Policies in the TBP seek to ensure that all people (including protected groups) in the TBP area will have a high-quality environment in which to live, work, learn and socialise. Policies relating to housing (RES1-14) were all found to have positive effects for the protected characteristics. The Policies will increase the levels of housing available for protected characteristics, with associated positive effects. Policy GTTS1 will have long-term positive effects on gypsy and travellers through the allocation of sites to help meet the identified pitch and plot requirement.
- 3.17 Policies GRB1 will provide details on areas of Green Belt land that will be released to allow for the development of housing. The areas of Green Belt have been assessed as having a weak contribution to Green Belt purposes, and the release will allow for the creation of a robust and defensible Green Belt boundary. The Policy was not considered to have a positive or negative effect on protected characteristics. Policies GRB 2 and 3 will focus on the Green Belt at Gloucestershire Airport and Bamfurlong Operational Policing Site, and were also considered to be not applicable for protected characteristics.
- 3.18 Policies on healthy communities, open space and recreation (HEA1, RCN1-4, COM1-3) overall are likely to have strongly positive effects for all groups

⁴ Planning Policy for Travellers Sites (requires that plan policies do not locate traveller sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans (Page 4).

through provision of and access to healthy activities; additional benefits through provision of allotments with locally grown food and health/well-being benefits. Policy HEA1 Healthy Communities explicitly requires new development to contribute towards healthy environments through an inclusive environment that is suitable for all members of society – with positive effects for all protected characteristics.

- 3.19 Transport and accessibility Policies (TRAC1-9) – TRAC 1 Pedestrian Accessibility requires consideration of all potential users, including those with disabilities, to ensure high standards of inclusivity and that all members of society can travel safely and easily – with strongly positive effects indicated for all protected characteristics. The other Policies 2-9 provide specific details to support TRAC1.
- 3.20 Policies EMP1-6 were found to have positive effects for all protected characteristics as they will provide new employment opportunities and safeguard existing employment land, which will have positive effects on health and well-being. Policies TOR1-5 were also found to have positive effects on protected characteristics, as the safeguarding and support of the tourism sector will have positive effects on the local economy, which will have positive effects for communities. Policies AGR1-4 were found to be not applicable, with neither positive or negative effects for protected characteristics.
- 3.21 The Landscape and Environmental Policies (LAN1-5; NAT1-5; ENV1-3) are also likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups. Particular requirements for new development, including protection from flood risk in ENV2, are likely to secure further positive effects for all groups.
- 3.22 Of particular importance to the protected characteristics are Policies: RES1-7; GTS1; HEA1, RCN1-4, COM1-3, and TRAC1-10. These ensure that high quality spaces are provided as part of housing, employment and community facilities which will meet the needs of all and are accessible to all. The policies also seek to ensure that these places are safe, vibrant, healthy and inclusive. Policies HEA1, RCN1-4 are specifically concerned with health and recreation – and this will have positive effects on the protected characteristics. Policies EMP1-5 and TOR1-3 on employment and tourism will support health and equality aims since health/well-being is closely linked with having a job.
- 3.23 Policy RES1 proposes site allocations for rural sites, and this will help benefit protected groups in the rural areas. The Joint Core Strategy allocates four major strategic development sites wholly in the TBP area and two major strategic development sites partially in the TBP area. It may be noted that JCS Policy D2 focuses on a number of assessment requirements which will help identify and provide mitigation for the effects of major developments and one of the requirements, to produce a Health Impact Assessment, will particularly benefit all protected groups.

- 3.24 This Screening Assessment has not made any suggestions for enhancements to strengthen the draft TBP and increase the certainty of the positive effects identified for all protected characteristics. The assessment found that all the components of the Plan will lead to positive effects on the protected characteristics and there were no negative effects identified.

Monitoring

- 3.25 Gloucestershire County Council each year publishes a number of equality progress reports demonstrating how the Council advances equality, eliminates discrimination and fosters good relations relating to their workforce, their services and ways of working. Tewkesbury Borough Council is also required to prepare a Monitoring Report which includes consideration of equality, health and diversity.
- 3.26 The adopted GCT JCS provides a separate monitoring framework that sets out key indicators and contingencies that are critical to ensure the successful delivery of the plan. These indicators and contingencies are attached to the strategic objectives and policy targets of the Plan and directly and indirectly relate to equality, health and diversity. It will also be reviewed on an annual basis. The TBP includes a number of indicators and monitoring frequencies/reporting specifically concerned with promoting healthy communities. Therefore, further monitoring regarding equality is not considered to be required.

4.0 Summary and Conclusions

- 4.1 The Tewkesbury Borough Plan (TBP) sets out the proposed approach to accommodating non-strategic development in the Tewkesbury Borough administrative area. This has been allocated according to needs identified from the Gloucester, Cheltenham and Joint Core Strategy (adopted 2017) for the period up to 2031.
- 4.2 The development of the TBP has been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010.
- 4.3 The Vision, Objectives, and Policies, including site allocations, have been assessed to the same level of detail, taking into account the baseline information gathered to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The assessment found that the all the components of the Plan will lead to positive effects on the protected characteristics with no negative effects being identified.
- 4.4 A number of reports are already produced on an annual basis which include consideration of equality, health and diversity within the JCS area. The Draft TBP also provides a further monitoring framework that addresses equality, health and diversity through assessing the delivery of the TBP against its objective and policy targets for promoting healthy communities. Therefore, further monitoring regarding equality and diversity is not considered to be required.
- 4.5 The assessment has found that the TBP Pre-Submission is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.
- 4.6 These findings will be subject to consultation comments from wider stakeholders as part of the Sustainability Appraisal accompanying the TBP on Regulation 19 consultation. Any comments received will be submitted together with the TBP and its supporting evidence to the Secretary of State for independent examination.

TBP Equality & Diversity Impact Assessment – Appendix I Plans, Programmes & Assessments

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
National Planning Policy Framework (NPPF) (2012) & revised 2018	<p>The national planning policy framework aims to reform the planning system to make it less complex and more accessible, and to promote sustainable growth. The NPPF streamlines existing Planning Policy Statements, Planning Policy Guidance Notes and circulars to form a single consolidated document which promotes sustainable development. It provides a framework within which local people and authorities can produce local and neighbourhood plans. Local Plans should set out strategic priorities to deliver:</p> <ul style="list-style-type: none"> ▪ To deliver a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); ▪ Consider the needs of people with disabilities by all modes of transport. 	
Community Infrastructure Levy (Amended) (2015)	<p>Provides system to fund new local infrastructure through new development. CIL is a charge that will be payable by developers when they begin construction of new developments. Confirms the funding method for delivery of major aspects of the infrastructure requirements for development.</p>	
Planning for Travellers 2015	<p>The document sets out the proposed new, single Planning Policy for traveller sites. The policy aims to:</p> <ul style="list-style-type: none"> ▪ enable local planning authorities to make their own assessment to set their own pitch/plot targets ▪ encourage local planning authorities to plan for sites over a reasonable timescale ▪ protect Green Belt from development ▪ reduce tensions between settled and traveller communities in the planning system ▪ remove repetition of national planning policy that is set out elsewhere ▪ remove unjustified differences in policy in the two circulars, and between the two circulars and other policy statements ▪ remove unnecessary guidance and context so that planning policy documents contain only policy ▪ ensure that local planning authorities, working together, have fair and effective strategies to meet need through the identification of land for sites ▪ promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites ▪ reduce the number of unauthorised developments and encampments and make enforcement more effective if local planning authorities have had regard to this policy 	

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	<ul style="list-style-type: none"> ▪ ensure that the development plan includes fair, realistic and inclusive policies ▪ increase the number of traveller sites, in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply ▪ reduce tensions between settled and traveller communities in plan making and planning decisions ▪ enable provision of suitable accommodation from which travellers can access education, health, and welfare and employment infrastructure. 	
Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016 - 2021	Brings together the Government's plans for economic infrastructure over the next 5 years with those to support delivery of housing and social infrastructure.	
Public Health England, Global Health Strategy 2014 to 2019	The paper summarises the government's strategy to protect the population from serious health threat; helping people live longer, healthier and faster and more fulfilling lives; and improving the health of the poorest, fastest. Outlines the cross-government framework that will enable local communities to reduce inequalities and improve health at key stages in people's lives, including:	
Natural England (2014) Green Infrastructure Guidance	Guidance articulates NE's position in relation to green infrastructure planning and delivery, which is increasingly recognised as an essential part of sustainable spatial planning. This is due in no small part to the role of green infrastructure as a life support system, able to deliver multiple environmental functions, and to play a key part in adapting to and mitigating climate change.	
Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Adopted 2017	The document outlines the future of development (both housing and employment) and associated infrastructure for Gloucester, Cheltenham and Tewkesbury and their surrounding areas up until 2031. Includes specific strategic objective for promoting healthy communities.	
Leadership Gloucestershire	Leadership Gloucestershire (LG) brings together public sector organisations which allocate and spend significant resources in Gloucestershire. Its role is to provide vision, leadership and strategic direction in those areas where it is vital for organisations to work together to meet the needs of the people and communities of Gloucestershire in the most cost effective way. LG will work together to reduce current costs, minimise future costs and deliver better outcomes for the benefit of the people of Gloucestershire. They will work with others to achieve their objectives.	
Gloucestershire Health and wellbeing Strategy 2012 – 2032 – Fit For The Future	<p>The aspiration of this strategy is to continue to improve the quality of life for everyone in Gloucestershire within available resources. This is why the strategy spans 20 years, and it aims to be implemented through three-year action plans that are refreshed annually. This will enable measurement of progress in the short, medium and longer term. Uses the life-course approach:</p> <ul style="list-style-type: none"> ▪ Starting well – with a focus on pregnancy and early years to give every child the best start in life 	

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	<ul style="list-style-type: none"> ■ Developing Well – a focus on children and young people maximising their capabilities and control over their own lives ■ Living and Working Well – a focus on promoting healthy lifestyles; equitable access to ill-health preventative services; healthy and sustainable physical environments; building social networks and communities and access to good employment opportunities ■ Ageing Well – promoting independence, physical and mental health and wellbeing post-retirement. 	<p>Under each of the above headings it sets aspirations to achieve in the Gloucestershire area.</p>
<p>Gloucestershire Children and Young People’s Partnership Plan 2015-18</p>	<p>The Vision of the Plan is ‘To ensure our children and young people thrive and reach their full potential; supporting when we are needed most’.</p> <p>The aims of the Plan are as follows:</p> <ul style="list-style-type: none"> ■ Children will thrive at home: Families stay together, keeping families together dealing with emerging problems ■ Children will thrive at home with help: Preventing family breakdown providing help for children and parents. Families stay safely together; with extra help from communities and practitioners ■ Children will thrive with specialist help: Providing for effective and efficient responses and lasting solutions. Children, who need it, will have specialist help; have a good experience and settle permanently, quickly and safely. ■ We will work well together: We will change our systems Planning, developing and jointly providing appropriate support for families 	
<p>The Sustainable Community Strategy for Tewkesbury Borough 2008 – 2028 (Refreshed November 2010)</p>	<p>The original strategy was developed by the Tewkesbury Borough Local Strategic Partnership which brings together key agencies, organisations and partnerships from the public, private, community and voluntary sectors.</p> <p>The Sustainable Community Strategy plays an important role in providing the long-term vision which takes into account these challenges whilst continuing to deliver our local communities priorities</p> <p>Vision: A Borough of healthy, strong, thriving and sustainable communities, both rural and urban, where people want to live, work and visit.</p> <ul style="list-style-type: none"> ■ Ambition 1: A Thriving Economy ■ Ambition 2: A Healthy, Safe & Inclusive Community ■ Ambition 3: A Sustainable Natural & Built Environment 	

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Tewkesbury Equality and Diversity Policy 2012-2016	The Equality and Diversity Policy will enable the Council to demonstrate how they are complying with the Equality Act 2010. The Policy contains equality objectives, which are as follows:	<ul style="list-style-type: none"> ▪ To develop understanding and take action on environmental and health inequalities ▪ To promote respect and tackle discrimination and hate crime ▪ To provide better access to quality homes and supply of affordable housing ▪ To address barriers to employment and embed equality and diversity within our own organisation and the wider business community ▪ To strengthen our understanding of local communities and their changing needs including the needs of older people in an ageing population ▪ To improve access to our services and opportunities to influence them
Tewkesbury Borough Housing Strategy (2017-2021)	The strategy details how the council will create sustainable communities through the delivering of housing to meet the needs of local people, and the strategy will help meet the overall Vision for the Plan area. The strategy focuses on addressing existing housing issues in the Plan area, how to create a more sustainable housing market, and homelessness. Overall the strategy provides 4 key priorities which the strategy should achieve:	<ul style="list-style-type: none"> ▪ Increasing the supply housing ▪ Prevent homelessness ▪ Meet the housing needs of specific groups ▪ Improving the health and well-being of local people
Gloucestershire and South Gloucestershire: Affordable Warmth Strategy 2013-2018	The warmth strategy aims to address the increase in fuel poverty within the area, and increase levels of affordable warmth where homes can be heated without increased levels of debt. The Strategy details the partnership who will focus on addressing the issue, and the sectors where actions will be focused. The Strategy provides 4 key aims:	<ul style="list-style-type: none"> ▪ Co-ordinate delivery, work in partnership and influence policy ▪ Improve energy efficiency across all housing tenures ▪ Promote and provide advice and information ▪ Identify and help people at risk of fuel poverty
Gloucester City Vision 2012 - 2022	The Gloucester City Vision 2012- 2022 document sets out what we want to achieve for the City over the next ten years. The City Vision lays out our key strategic priorities for the City which all public, private and voluntary sector partners will aspire to deliver. The City Vision will provide an overarching framework for all partner's strategic plans including important City Council documents such as the Joint Core Strategy and the Gloucester City Plan. Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy.	<p>Aims:</p> <ul style="list-style-type: none"> ▪ A flourishing economy and City Centre which meets the needs of our residents, businesses and visitors.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	<ul style="list-style-type: none">▪ A vibrant evening economy.▪ A City which improves through regeneration and development.▪ A City where people feel safe and happy in their community.▪ A healthy City with opportunities available to all.	

TBP Equality & Diversity Impact Assessment (EqIA) Appendix II: Impact Assessment Screening

EqIA Key and Method Notes:

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

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

Assessment Key	
+	Positive Effect
-	Negative effect
○	Neutral Effect
N/A	Not Applicable
?	Unknown or Uncertain Effect

TBP Vision:

“Tewkesbury borough, a place where a good quality of life is open to all, where our environment and heritage assets are cherished, a sufficient supply of homes is available and where a thriving economy supports healthy and happy communities.”

This will be achieved by ensuring that development is directed away from land at risk of flooding and high-quality landscapes/heritage assets and towards locations where the mix of land uses and proximity to existing facilities minimises travel distances and maximises transport choice.

EqlA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Vision	+	+	+	+	+	+	+	+	+
<p>Commentary</p> <ul style="list-style-type: none"> ■ The Vision should benefit all groups as it seeks to provide a place where a good quality of life is open to all; this will have positive effects on all groups improving their quality of life and meeting the needs of each group's distinctive and individual needs. ■ Avoidance of development increasing the risk of flooding is particularly positive for specific social groups (the elderly, gypsies and travellers¹ and disabled people) as they are more likely to be adversely affected by flood events. 									

¹ Planning Policy for Travellers Sites (2015) requires that plan policies do not locate traveller sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans (Page 4).

TBP Objectives	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
EqIA Protected Characteristics									
Plan Objectives									
Wide Choice of Quality Homes	+	+	+	+	+	+	+	+	+
Facilitate Development Aspirations	+	+	+	+	+	+	+	+	+
Sustainable Transport	+	+	+	+	+	+	+	+	+
Healthy Connected Communities	+	+	+	+	+	+	+	+	+
Prosperous Economy	+	+	+	+	+	+	+	+	+
Sustaining Rural Towns & Villages	+	+	+	+	+	+	+	+	+
Conserving, Enhancing Environment	+	+	+	+	+	+	+	+	+
Climate Change	+	+	+	+	+	+	+	+	+
Commentary									
<ul style="list-style-type: none"> ■ Generally, the Objectives will have positive effects on all protected characteristics. ■ In particular, 'Delivering a wide choice of quality homes'; 'Facilitating Development Aspirations', 'Promoting sustainable transport'; 'Promoting healthy connected communities'; and 'Meeting the challenges of climate change' will have greater positive effects on all social groups by improving accessibility, providing buildings that will meet their needs and be of a good quality; also providing flexible and adaptable buildings and places that are resilient to climate change and flooding. ■ None of the Objectives are biased towards one particular protected characteristic, and none of the Objectives will result in negative effects on protected characteristics. 									

TBP Objectives EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<ul style="list-style-type: none"> ▪ 'Supporting a prosperous economy' will also promote positive effects on health and equality factors ▪ Addressing climate change will have positive effects on health. 									

TBP Policies: Pre-Submission EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Plan Section: Housing									
RES1-14 Housing GTS1 Gypsy and Travellers	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> ▪ All the Housing Policies overall should benefit all groups as they seek to increase the availability of housing in existing urban areas and with some development in rural areas. 									

TBP Policies: Pre-Submission EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<ul style="list-style-type: none"> Allocations will be phased to reflect site availability and where development has already been committed at settlements in order to help social cohesion – with benefits for all groups. Positive effects will occur as a result of RES13 Housing Mix that promotes a mix including the needs of older people and vulnerable groups; further positive effects are indicated through RES14 Specialist Accommodation for Older People that supports identified needs including care housing and seeking to enable residents to live independently. Policy RES15 will have long-term positive effect on age and disability by promoting accessible and adaptable homes. Policy GTTS1 will have long-term positive effects on gypsy and travellers through the allocation of sites to help meet the identified pitch and plot requirement. 									
Plan Section: The Green Belt									
GRB1-3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Commentary									
<ul style="list-style-type: none"> The Policies in this section will not have any significant effects on any of the identified protected characteristics. The Policies will either remove small areas of land from the Green Belt to improve the Green Belt boundary and permit development or provide criteria for development associated with Gloucestershire Airport or Bamfurlong Operational Policing Site which may occur in the Green Belt, with no likely significant effects. 									
Plan Section: Communities, Health & Recreation									
HEA1 Healthy Communities RCN1-4 Open Space & Recreation COM1-4 Community Assets	+	+	+	+	+	+	+	+	+

TBP Policies: Pre-Submission EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<p>Commentary</p> <ul style="list-style-type: none"> Policy HEA1 Healthy Communities explicitly requires new development to contribute towards health environments through an inclusive environment that is suitable for all members of society – with positive effects for all protected characteristics. This is further confirmed through the requirement for a Health Impact Assessment for developments where there might be significant impacts on health and well-being and requirements for mitigation of any adverse impacts identified. HEA1 requires access to sufficient open space and recreation facilities; RCN1-4 provide further details including for the specific uses of allotments and horse riding – all with positive effects for all protected characteristics. COM1-4 protect community assets, require fast broadband, and set out the Council's intentions with regard to Neighbourhood Plans – all with potential for likely positive effects and inclusivity. <p>Overall, strongly positive effects for all groups through provision of and access to healthy activities; additional benefits through provision of allotments with locally grown food and health/well-being benefits.</p>									
Plan Section: Transport & Accessibility									
TRAC1-9	+	+	+	+	+	+	+	+	+
<p>Commentary</p> <ul style="list-style-type: none"> TRAC1 Pedestrian Accessibility requires consideration of all potential users, including those with disabilities, to ensure high standards of inclusivity and that all members of society can travel safely and easily – with strongly positive effects indicated for all protected characteristics. 									

TBP Policies: Pre-Submission EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<ul style="list-style-type: none"> Other Policies provide the specific requirements regarding cycling, buses, rail station, M5/A46 corridor, bypass, walking & parking thus explaining the details for transport and accessibility – all with positive effects. 									
Plan Section: Economy and Tourism									
EMP1-6	+	+	+	+	+	+	+	+	+
AGR1-4	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TOR1-5	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> Overall these policies have benefits for all groups and protected characteristics as employment is known to have positive effects on health and well-being Policies EMP1-6 will have positive effects through the allocation of sites for major employment development, through the safeguarding of existing employment development, and managing employment development within settlement boundaries. Overall this will have positive effects for protected characteristics by providing employment opportunities in the Plan area and safeguarding existing employment opportunities. 									

TBP Policies: Pre-Submission EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
<ul style="list-style-type: none"> ■ Policies AGR 1-4 will permit appropriate new agricultural development and agricultural diversification where criteria are met and will also protect agricultural accommodation. The Policies will not have an effect on protected characteristics and are therefore considered not applicable. ■ TOR1-5 focus on tourism development. This includes the safeguarding and potential enhancements of tourist attractions including the Gloucestershire Warwickshire Railway and caravan and camping sites. The support of the tourism industry will have positive indirect effects on protected characteristics through supporting the local economy. 									
Plan Section: Town Centres & Retail									
RET1-9	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> ■ Policies support the viability and vitality of appropriate retail facilities that are easily accessible by public transport, walking and cycling will be inclusive and positive effects are indicated. ■ 									
Plan Sections: Quality Places; The Natural Environment									
DES1-4; HER1-6; LAN1-5; NAT1-5; ENV1-3	+	+	+	+	+	+	+	+	+

TBP Policies: Pre-Submission EqlA Protected Characteristics									
	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Commentary <ul style="list-style-type: none"> ■ These Policies are likely to lead to positive effects on the protected characteristics as they aim to protect and enhance the environment in which the protected groups live. This can have benefits in terms of health and cultural well-being for all groups. ■ Particular requirements for new development, including protection from flood risk, are likely to secure further positive effects for all groups. 									