

Equality Impact Assessment



Assessment Of: Statement of Community Involvement	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other:	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Strategic Place	Assessment carried out by: Michelle Luscombe
Service Area: Planning	Job Role: Planning Policy Manager
Version / Date of Sign Off by Director:	24.10.24

Step 1: What do we want to do?

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Policy Officer early for advice.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The Statement of Community Involvement details the consultation Teignbridge District Council will undertake on Planning Policy Documents, including the types of planning policy documents on which we will consult, who we will consult on these, the methods of engagement we will use and the timescales we will follow. It also sets out consultation details relating to planning applications.

Teignbridge has had an adopted Statement of Community Involvement since 2011, most recently reviewed in 2019. Following the 2017 amendments to the Town and Country Planning (Local Planning) (England) Regulations there is a requirement to review the SCI every 5 years, hence this review and update to reflect current technology, changes to the social environment, and best practice evidence.

1.2 Who will the proposal have the potential to affect?

Service users The wider community Teignbridge workforce

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by your manager.

If 'Yes' complete the rest of this assessment.

Yes **No** [please select]

This document details the way we will consult on Planning Policy Documents and planning applications, and is intended to not only meet our statutory obligations in this regard but to detail the actions we will take to broaden opportunities for stakeholders from across our communities to respond to the consultations we undertake. It supports our Public Sector Equality Duty by setting out our intention to engage with all sectors of the community to ensure they have opportunity to influence the plans and policies that affect the way they live their lives. The Statement of Community Involvement as proposed is intended to have a positive equality impact through the positive framing and minimum standards for how we will consult, whilst maintaining allowances for flexibility and discretion in methods of engagement to allow officers to meet the needs of communities who may be affected by planning. The groups we will engage with, and the methods by which we will consult, have been considered with due regard to our statutory duties, and potential equality impacts, and the evidence detailed below.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics (listed in 2.2).

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data - from national research, local data or previous consultations and engagement activities.

Outline whether there are any over or under representation of equality groups within your service - don't forget to benchmark to local population where appropriate.

For workforce / management of change proposals you will need to look at the diversity of the affected team(s) using available evidence such as the employee profile data. Identify any under/over-representation for age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Please see: [Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk).

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
Protected Characteristics: Age and Disability The Local Housing Needs Assessment (September 2022) highlighted the following demographic trends within Teignbridge. Age: <ul style="list-style-type: none"> - Overall district population is projected to increase from approximately 135,000 (2020) to 148,000 (2040). - Within this period the number of persons aged 65 and older will increase by 13,000 or approximately 35% of the entire district's population in 2040. - In household terms the total number of households by age of representation will see an increase of approximately 9,000 of those over 65. - In the district over the 20-year period, around 25,500 extra households will be 	The evidence tells us that we need to ensure we obtain the views of elderly people and people with disabilities as part of consultations to ensure that we plan adequately and appropriately for their needs.

<p>formed by those under 75. However, these extra households are offset by the reduction of 16,600 households aged 85 or over in 2040. This results in a total increase of approximately 8,900.</p> <p>Disability:</p> <ul style="list-style-type: none"> - In 2020 the total number households including affordable and market where an existing illness or disability affects their housing need and need to move stood at approximately 512. - An additional 11,147 households are projected to be in a similar position in 2040. This figure is, however, lowered to 4,724 when adaptable existing dwellings are considered to meet basic standard (M4(1)). The lower figure represents 33% of the total local housing need. <p>Ref: East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment: Report findings for Teignbridge, September 2022 (ORS).</p>	
<p>Protected Characteristic: Race Gypsies and Travellers Gypsy and Traveller Accommodation Assessment 2022</p> <p>We have a resident gypsy and traveller population in Teignbridge and the latest evidence contained within the Gypsy and Traveller Accommodation Assessment 2022 shows that there is a need for at least 51 additional permanent pitches for Gypsy and Travellers in the period until 2041.</p>	<p>The evidence tells us that we need to ensure we obtain the views of gypsies and travellers as part of consultations to ensure that we plan adequately and appropriately for their needs.</p>
<p>Protected characteristics: ethnicity; religion; sexual orientation; sex; gender reassignment</p> <p>Reference: ONS, Census 2021</p> <p>Teignbridge Ethnic Group Classification:</p> <ul style="list-style-type: none"> • 97.6% (2021 census) of the district identifies as predominantly white (e.g., English / Welsh / Scottish / Northern Irish / British / Irish or Any other White background). • 0.7% of the district identifies as predominantly Asian (e.g., Asian British / Asian Welsh / Bangladeshi / Chinese / Indian / Pakistani or Any other Asian background). • 0.1% of the district identifies as predominantly Black (e.g., Black British / 	<p>This tells us that the district has a predominantly white British population. Compared to the United Kingdom as a whole, Teignbridge has lower proportions of the population who identify as Asian, Black, other or mixed ethnicity. This shows we should take care to ensure the voices and needs of minority groups are met.</p>

<p>Black Welsh / Caribbean / African or other Black).</p> <ul style="list-style-type: none"> • 1.1% of the district identifies as predominantly Mixed of Multiple Ethnic groups (e.g., White and Asian / White and Black African / White and Black Caribbean and Other Mixed or Multiple ethnic groups). • 0.3% of the district identifies as predominantly and other ethnic group (e.g., Arab or any other ethnic group). 	
<p>Additional comments:</p>	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps please state this clearly with a justification.

For workforce related proposals all relevant information on characteristics may need to be sought from HR (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require action to address and identify the information needed.

<p>Over the past 5 years, the Council has undertaken the following six rounds of early public engagement which have informed the preparation of the Proposed Submission Local Plan:</p> <ol style="list-style-type: none"> Local Plan Review Issues Paper 2018 – 21 May – 16 July 2018 Part 1 Consultation: Quality as Standard (Development Management policies only) - 23 March – 13 July 2020 Part 2 Consultation: Delivering Quality Development (Site Options only) - 28 June – 9 August 2021 Part 3 Consultation: Delivering Quality Development (Small sites, wind turbine sites, and gypsy and traveller sites only) - 15 November 2021 – 24 January 2022 Proposed Submission Local Plan – 23 January 2023-13 March 2023 Local Plan Addendum – 8 November 2023-20 December 2023 <p>The Council received over 9,000 responses to these consultations, from residents, businesses, interest groups, the development industry, landowners, and statutory consultees (which include neighbouring authorities, town and parish councils and government agencies). Historically, consultation on the Local Plan has always attracted most interest from older age groups in the district, and homeowners living close by to proposed developments. To try and widen the scope of engagement, consultation on this Local Plan has used different techniques which appeal to the widest cross section of the community as possible. This has largely been</p>

achieved through predominantly virtual consultations, which have used online videos and social media to promote all aspects of the plan.

All respondents are asked to complete an Equality Questionnaire when sending comments to us. This is not compulsory and approximately 42% of Part 2&3 respondents completed these. Only information relevant to the plan was requested, such as age, gender and ethnicity, as agreed by the Communications Team and Business Improvement and Development Team.

Analysis of the responses to the previous consultations show that:

- Local plan consultation respondents were largely from middle age and older groups. This is reflected in Part 2 submissions with ages 45 – 64 making up 44% and ages 65 and older making up 27%, respectively. A similar trend was reflected in Part 3 with ages 45 – 64 making up 42% and ages 65 and older making up 29% respectively. Part 1 did not record ages of respondents.
- Local Plan consultation responses showed a better representation of middle age groups for both Part 2 and Part 3 consultations:
 - o Part 2: Ages 45-64 represented 44% of respondents; ages 65+ represented 27%
 - o Part 3: Ages 45-64 represented 42% of respondents; ages 65+ represented 29%
- 97.7% (2021 census) of the district identifies as predominantly white (e.g., English / Welsh / Scottish / Northern Irish / British / Irish or Any other White background). Both Part 2 and Part 3 consultations attracted wider representation than this, with 89% and 84% of respondents identifying themselves as predominantly white respectively.

Approximately 65% of respondents to the Proposed Submission Local Plan (Regulation 19) completed the Equality Questionnaire. Analysis of the responses to the consultation show that:

- The 2021 Census reported that approximately 28.5% of the District was between the ages of 45 – 64 and ages 65 and older making up 27.1% of the District. 29.5% of the district is aged between 15 – 44 (Census age categories differ to local plan age categories).
- Local plan consultation respondents were largely from middle age and older groups. This is reflected in Proposed Submission responses with ages 45 – 64 making up 37.4% and ages 65 and older making up 30.9%, respectively.
- 16% of responses were from respondents aged between 18 – 44.
- 15.6% of respondents preferred not to state their age.
- 97.7% (2021 census) of the district identifies as predominantly white (e.g., English / Welsh / Scottish / Northern Irish / British / Irish or Any other White background).
- The Proposed Submission consultation attracted wider representation than this, with 83.4% of respondents identifying themselves as predominantly white respectively. However, 15.1% respondents indicated a preference to not state their ethnicity.

62% of respondents to Local Plan Addendum consultation completed the Equality Questionnaire. Analysis of the responses to the consultation show that:

- The 2021 Census reported that approximately 28.5% of the District was between the ages of 45 – 64 and ages 65 and older making up 27.1% of the District. 29.5% of the district is aged between 15 – 44 (Census age categories differ to local plan age categories).
- Local plan consultation respondents were largely from middle age and older groups. This is reflected in Proposed Submission responses with ages 45 – 64 making up 48% and ages 65 and older making up 30%, respectively.
- 12% of responses were from respondents aged between 18 – 44.
- 20% of respondents preferred not to state their age.
- 97.7% (2021 census) of the district identifies as predominantly white (e.g., English / Welsh / Scottish / Northern Irish / British / Irish or Any other White background). 0.8% of respondents identified themselves as 'Other Ethnic Group', while 17% preferred not to state their ethnicity.

-

Throughout the preparation of the plan, we have engaged with the local gypsy and traveller community through the Gypsy and Traveller Forum. This group has informed the drafting of policy and the methodology used for the Gypsy and Traveller Needs Assessment.

We do not currently monitor the following characteristics:

- Marriage and civil partnership; religion or belief; pregnancy/maternity; sexual orientation

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this has been of Teignbridge's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to HR for advice on how to consult and engage with employees. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups, trades unions as well as affected staff.

The involvement of communities has been through previous consultation on both the SCI and the One Teignbridge Strategy as set out below:

The updated SCI is largely unchanged from the 2019 version, as a review of the document has identified that it remains fit for purpose subject to some small amendments being made. For the 2019 SCI, a full consultation was carried out which identified the following key issues:

Neighbourhood Plans: Various responses felt that the SCI should have greater emphasis on Neighbourhood Planning. This has been addressed through the inclusion of specific sections relating to the advice and assistance we will provide to neighbourhood planning groups and the key stages involved in Neighbourhood Plan preparation.

Timing of Publication of the Draft SCI: Concern was expressed that the draft SCI should have been consulted on in advance of the Local Plan Review and that there was a lack of awareness about the SCI consultation. The consultation on the draft SCI was done in accordance with not only the adopted SCI (2011) but also with the new principles set out in the draft Greater Exeter SCI (2019), which exceeded the previous standards. This resulted in a sufficiently comprehensive and robust consultation process.

Views of Local People: Some respondents felt that the SCI should contain reference to named organisations representing local groups. However, it is not considered appropriate to do this as these groups may change during the lifetime of the SCI. Any individual or organisation wishing to be informed of planning consultations can request at any time to be added to the Council's planning consultee database.

It was also felt that the views of local people should be better considered when decisions are made. All consultation comments received are fully considered and either full or summarised responses are provided to ensure transparency.

Length of Local Plan Documents: A comment was made that the Local Plan Review documents are too technical and lengthy, which discourages involvement. As the consultation documents are planning policy documents, they require a certain amount of technical wording to be

robust and defensible. We will endeavour to provide plain English summaries where it is appropriate to do so and to ensure that consultation documents will be clear and concise and will not include avoidable “jargon”, without understating the complexities of any decision.

Site Notices: There was a request that all nearby properties be written to when a planning application is submitted, rather than relying on a site notice and local press for publicity which may not be seen by all. The procedures carried out by the Council accord with the Town and Country Planning Act 1990 (as amended), Development Management Procedure Order and have also been approved by the Council's Planning Committee. The procedure varies according to the nature of the application received. However, officers do have discretion to provide additional publicity if it is deemed necessary.

Social media: It was requested that the Council makes greater use of social media to engage the public in planning issues. We publicised this consultation via both Twitter and Facebook and continue to make a commitment in the SCI to raise awareness of consultations through the use of social media.

A few further changes have been proposed to the updated SCI to take account of:

- Statutory requirements
- Technological changes
- One Teignbridge Council Strategy consultation. (The SCI as proposed supports existing council initiatives, including the council's One Teignbridge strategy principles of 'The Way We Will Work', with the pledge to 'talk meaningfully with you about the projects and decisions that affect you and your area'.)

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Consultation Officer for help in targeting particular groups.

Throughout the consultations on Planning Policy Documents there is an opportunity for respondents to feed back not just about the documents on which they are commenting but on the methods of engagement and the tools and systems through which the consultation has been carried out. Equality questionnaires are also included as standard practice to monitor the characteristics of those responding to consultations.

Equality data is not monitored in relation to those responding to planning applications.

Whilst specific consultee groups/characteristics are not named within the SCI, there is potential to work with organisations, such as the CVS, who directly work with people with these characteristics.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal.

3.1 Does the proposal have any potentially adverse impacts on people on the basis of their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
<p>The SCI ensures that engagement is open and accessible to all.</p> <p>The SCI states: "Involvement will be open to all, regardless of age, sex, marital status, disability, religion or belief, gender reassignment or sexual orientation and with measures to encourage responses from under represented groups."</p>	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	The increasing use of digital technologies for the advertisement of and completion of consultations could improve awareness of consultations and opportunities to engage for young people.
Mitigations:	n/a
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	The increasing use of digital technologies for the advertisement of and completion of consultations could lead access difficulties for older people who are statistically less digitally connected.
Mitigations:	The methods of engagement (page 6) include specific references to offline advertising and communication methods, including making paper copies of documents available in offices and libraries, displaying leaflets and posters, and arranging face-to-face meetings where appropriate. The SCI states: "Involvement will be open to all, regardless of age, sex, marital status, disability, religion or belief, gender reassignment or sexual orientation and with measures to encourage responses from under represented groups."
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	See general comments
Mitigations:	
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	See general comments
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	See general comments
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	See general comments
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	See general comments
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	See general comments

Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	See general comments
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>
Potential impacts:	See general comments
Mitigations:	

OTHER RELEVANT CHARACTERISTICS

Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other group(s) <i>Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Rural/Urban Communities, Homelessness, Digital Exclusion, Access To Transport</i>	Rural isolation Asylums and refugees
Potential impacts:	Rural communities may not benefit from the same level of awareness and accessibility to consultations as is often promoted in urban communities (e.g. through the availability of plans at libraries, or through social media where digital connectivity may be poor). Asylums and refugees may not benefit from the same level of awareness and accessibility to consultations as domestic residents, including as a result of language barriers.
Mitigations:	To mitigate for this, the methods of engagement (page 6) include specific references to offline advertising and communication methods, including displaying leaflets and posters, and arranging face-to-face meetings where appropriate. The One Teignbridge Strategy also prioritises working with town and parish councils and the community and voluntary sector to engage on our behalf with residents most in need.

3.2 Does the proposal create any benefits for people on the basis of their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group

- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The SCI states: "Involvement will be open to all, regardless of age, sex, marital status, disability, religion or belief, gender reassignment or sexual orientation and with measures to encourage responses from under represented groups."

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This content should be used as a summary in reports, where this full assessment is included as an appendix.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:
--

n/a

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:
--

The SCI includes specific references to protected characteristic groups to ensure that efforts are made to hear from under represented groups when consulting on planning documents.
--

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Continue with wide ranging consultation methods to ensure everyone can access the consultation and achieve good representation. We will liaise with Gary Powell to increase inclusion from groups representing people with protected characteristics. The Council also has an SLA with the CVS to increase our knowledge of the experience of people with protected characteristics living in Teignbridge.	Michelle Luscombe	Ongoing for future consultations

4.3 How will the impact of your proposal and actions be measured?

How will you know if have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

Monitor relevant equality data on consultation responses.

4.4 Is there an opportunity to promote positive attitudes and good relations between different groups and communities?

Yes – through ongoing consultations, using the principles set out in the SCI and the One Teignbridge 'Way we will work' principles.

Step 5: Review & Sign-Off

EIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek review and feedback from management before requesting it to be signed off. All working drafts of EIAs and final signed-off EIAs should be saved in G:\GLOBAL\EIA. Once signed-off please add the details to the 'EIA Register' of all council EIAs saved in the same directory.

Reviewed by Service Manager: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Instead was reviewed by: Also reviewed by Rebecca Hewitt Date: 24.10.24	Strategic Leadership Team Sign-Off: Phil Shears Date: 24.10.24
---	---

October 2024

October 2024