

Equality Impact Assessment



Assessment Of: A Joint Strategy for East Devon, Exeter, Mid Devon, and Teignbridge; <i>Our Shared Coordinates</i>	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Place and Commercial Services	Assessment carried out by: Alex Lessware
Service Area: Spatial Planning	Job Role: Senior Planning Officer
Version / Date of Sign Off by Director:	20/11/2023

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 proposal is for the Council to adopt a new Joint Strategy covering Teignbridge (and the neighbouring authorities of East Devon, Exeter and Mid Devon) to the period up to 2040.

The Joint Strategy document reflects the ambitions and proposals of existing and emerging Local Plans.

The Joint Strategy is not itself a statutory plan nor a decision-making tool for development management purposes, but rather sets out the agreed direction of travel which will influence how we respond to our shared strategic opportunities and challenges.

The document titled 'Our Shared Coordinates' represents the ambitious commitments of East Devon, Exeter, Mid Devon and Teignbridge to ensure that the area develops as a prosperous, resilient and innovative economy and an unbeatable place to live, work and visit, which retains its competitive edge to attract investment. The purpose of the document is to:

- Demonstrate the joined-up strategy and policy approach the Councils have taken across the functional area.
- Articulate the clear benefits of working together as a cohesive area to address strategic opportunities and challenges.
- Serve as the starting point for identifying key strategic infrastructure and funding challenges.
- Provide a framework for wider collaboration with key stakeholders who are central to the spatial place-making agenda in the area.

The document is therefore aimed at the Councillors and its officers, as well as community groups and members of the public by communicating the direction of travel on strategic and cross-boundary issues that concern all the partner authorities.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community	<input checked="" type="checkbox"/> Teignbridge workforce
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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.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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The Joint Strategy is not a statutory document. It is based on adopted and emerging Local Plans. It echoes and summaries the existing and emerging local plans including their high-level objectives and key strategic actions that the Council(s) may take to improve quality of life for residents. The Joint Strategy outlines existing and potential actions under the following themes:

- Net Zero
- Jobs and Prosperity
- Homes
- Quality Places
- Nature
- Connectivity

The Joint Strategy sets a framework for what key objectives the Teignbridge planning, economic, housing and climate change teams may focus on, and identified key issues and infrastructure items where it will be beneficial for the authorities to work together.

This document in itself will not have any direct equality impacts. The high-level objectives do aim to improve quality of life, transport, access to housing, etc that could all lead to equality impacts (benefits) by informing decisions and investments. However, these would all be subject to specific individual decisions (e.g. capital investment or planning decisions).

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 compared with Teignbridge's economically active citizens for age, disability, ethnicity, gender, religion/belief and sexual orientation.

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
<p>Protected Characteristics: Age and Disability</p> <p>The Local Housing Needs Assessment (September 2022) highlighted the following demographic trends within Teignbridge.</p> <p>Ref: East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment: Report findings for Teignbridge, September 2022 (ORS).</p>	<p>Age for Teignbridge:</p> <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 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>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>Protected Characteristic: Race</p> <p>Gypsies and Travellers</p> <p>Gypsy and Traveller Accommodation Assessment 2022</p>	<p>Summary of evidence</p> <p>Updated evidence contained within the Gypsy and Traveller Accommodation Assessment 2022 shows that there is a need in Teignbridge for at least 49 permanent pitches for Gypsy and Travellers in the period until 2041.</p>
<p>Protected characteristics: religion; sexual orientation; gender</p>	<p>N/A</p>
<p>Additional comments:</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 /

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
	<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).

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

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input 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 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.

At a service level we do not annually monitor activity in the district by any of the protected characteristics, although evidence is gathered periodically to inform plan policies and proposals.

Evidence relating to these protected characteristics is used to support Plan making, specifically in the case of age, disability (and race relating to gypsies and travellers). The Joint Strategy recognises the issue and the need to plan for the needs of these groups.

The Joint Strategy will be delivered via the Local Plan, which is monitored annually.

Annual datasets are not available at the level of detail we would require to properly assess whether the Joint Strategy and/or Local Plan was having a positive, negative or neutral impact on groups and individuals which fall into these protected characteristics.

Preparation of Planning documents rely on up to date, detailed, and locally specific evidence which are commissioned as part of their preparation. As such, the annual monitoring report will record data on the delivery of specific targets, such as numbers of accessible homes and gypsy and traveller pitches, but further evidence will be required at the time of the next Local Plan review to assess the impact that this provision has had on the affected protected characteristics. The Council will continue to liaise with the Gypsy and Traveller Forum to discuss emerging evidence and requirements.

Protected characteristics changes between 2011 and 2021 Censuses:

- Age:
 - o median age of the District has increased from 47 to 49.

- number of people aged 65 to 74 years rose by around 4,400 (an increase of 30.1%), while the number of residents between 35 and 49 years fell by around 2,600 (10.5% decrease).
- Disability:
 - the proportion of non-disabled residents fell from 81.8% in 2011 to 81.4% in 2021.
 - percentage of people who were identified as being disabled and limited a lot in Teignbridge fell from 8.0% to 7.2%, while the percentage of people who were identified as being disabled and limited a little increased from 10.2% to 11.4%.
- Race:
 - 1.2% of Teignbridge residents identified their ethnic group within the "Mixed or Multiple" category, up from 0.7% in 2011. The 0.4 percentage-point change was the largest increase among high-level ethnic groups in this area.
 - 97.7% of people in Teignbridge identified their ethnic group within the "White" category (compared with 98.3% in 2011), while 0.7% identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (also 0.7% the previous decade).

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.

As the Joint Strategy is not a decision-making tool or statutory plan, it has not been published for public consultation. However, key stakeholders were consulted through a targeted consultation to identify any issues that may have been missed and to act as representatives of the groups/customers they serve: These were: Natural England; Historic England; Environment Agency; National Health Service; South West Water; National Grid; Western Power (now National Grid Electricity Distribution); Network Rail; National Highways; Active Travel England; Devon County Council (as Local Education Authority, Local Transport Authority, Minerals and Waste Planning Authority; and Health and Social Care Authority); Devon Housing Commission; Heart of South West Local Enterprise Partnership; Blackdown Hills AONB Partnership; and East Devon AONB Partnership. We received responses from 12 of these organisations and amended the strategy accordingly.

Over the past 4 years, the Council has undertaken the following rounds of public engagement which have informed the preparation of the Proposed Submission Local Plan, which has informed some of the headline considerations and objectives included in the Joint Strategy:

- a. Local Plan Review Issues Paper 2018 – 21 May – 16 July 2018
- b. Part 1 Consultation: Quality as Standard (Development Management policies only) - 23 March – 13 July 2020
- c. Part 2 Consultation: Delivering Quality Development (Site Options only) - 28 June – 9 August 2021
- d. Part 3 Consultation: Delivering Quality Development (Small sites, wind turbine sites, and gypsy and traveller sites only) - 15 November 2021 – 24 January 2022
- e. Proposed Submission Local Plan – 23 January 2023-13 March 2023

f. Proposed Submission Addendum Local Plan – 8 November 2023 – 22 December 2023

The Council received about 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).

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.

It is likely that many people who engaged with and responded to the Local Plan consultations will be the same people who may be interested in the Joint Strategy.

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:
 - Part 2: Ages 45-64 represented 44% of respondents; ages 65+ represented 27%
 - 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.

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.

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.

Consultation will continue through the individual Local Plans being progressed by the 4 participating authorities and through individual planning applications or project proposals.

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)	
No. The Joint Strategy is a high-level strategic document. Detailed planning policies contained in the Local Plans are where impacts may occur.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<p>Delivery of more homes which may align more closely with average incomes of younger households.</p> <p>Encourage business growth / job creation through the provision of employment land.</p> <p>Commitment to working towards a net-zero future.</p> <p>Improved to active travel and access to public transport and strategic road network included within top 10 infrastructure priorities for the sub-region.</p>
Mitigations:	n/a
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<p>Increased provision of homes and layouts suitable for an ageing population:</p> <ul style="list-style-type: none"> - Support for homes built to higher accessibility standards for people with mobility issues - Strategic healthcare provision included within top 10 infrastructure priorities for the sub-region.
Mitigations:	n/a
Disability	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Potential impacts:	<p>Increased provision of homes and layouts suitable for people with mobility issues:</p> <ul style="list-style-type: none"> - Support for homes built to higher accessibility standards for people with mobility issues and for housing to support people with additional needs - Strategic healthcare provision included within top 10 infrastructure priorities for the sub-region. - The District Design Code requires streets and spaces to be designed with accessibility for all users in mind, including wheelchair users, other wheeled access, and those with dementia. It picks up on 6 key design principles of: familiarity; distinctive environments; legibility; accessibility; comfortable and stimulating environments; and safety. - Emerging Policy DW3 of the Local Plan requires developments of 30+ homes to achieve a Building for Healthy Life Commendation which requires developments to be built in ways which improve people's physical and mental health.
Mitigations:	n/a
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Improved access to authorised pitches for gypsies and travellers through the allocation of additional land.
Mitigations:	n/a
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	

Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	

OTHER RELEVANT CHARACTERISTICS

Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Stated aim of protecting and creating protect and create conditions for high-value, well paid jobs and a clean, diverse and thriving local economy, with specific reference to regeneration of town centres, farming, and tourism.
Mitigations:	Delivery of more homes (including between 20-30% affordable homes) which may align more closely with average incomes of younger households.
Other group(s) <i>e.g. Asylums and Refugees; Rural Communities, Homelessness, Digital Exclusion, Access To Transport</i>	
Homelessness	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	An assessment of the number of homeless or concealed households is included within the Local Housing Needs Assessment which informs overall housing supply.
Mitigations:	A percentage of affordable housing is required on most new housing sites.
Digital Exclusion	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Better access to high speed digital networks across the districts.
Mitigations:	New residential and commercial development will be required to have access to high speed digital infrastructure.
Asylums/refugees	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Lack of temporary housing provision for asylums/refugees
Mitigations:	The Joint Strategy does not cover this level of detail.

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

See sections 1.3, 2.1 and 3.1 for identified impacts which have positive benefits for the stated protected characteristics. However it is important to note that the Joint Strategy is implemented via the Local Plan and other specific Council projects and programmes.

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:

Overall, the Joint Strategy identifies the headline challenges and opportunities shared between the Local authorities involved.
 It reflects the Local Plans which set a framework for future growth which seeks to improve the quality of life for all residents in the districts.
 The main protected characteristics which could potentially be affected positively by the Joint Strategy are age and disability.
 Through the policies and allocations of the Local Plan, more opportunities will be available for these groups to access the homes, services and employment that they require. The Local Plan also specifically addresses the accommodation needs of Gypsies and Travellers.

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
AS part of the Local Plan, continued consultation liaison with groups representing people with protective 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.	Rob Kelley	Jan-March 2023

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 on other relevant plans which are consulted on.
Monitor ONS data releases (e.g., Census, mid-year estimates, etc.)
Continue to liaise with the Gypsy and Traveller Forum on emerging evidence and requirements of this user group.

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 type="checkbox"/> No <input checked="" type="checkbox"/> Instead was reviewed by: Rebecca Hewitt Date: 20/11/2023	Strategic Leadership Team Sign-Off: Neil Blaney, Head of Place & Commercial Services Date: 20/11/2023
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