Equality Analysis Report

Title of activity / Budget Proposal title and number	Committee meeting (decision maker) and date
Bedford Borough Local Plan 2040	Executive 27 April 2022
Bediord Borough Local Fian 2040	
Service area	Lead officer
Environment, Planning	Gill Cowie
	Manager Planning and Housing Strategy
Approved by	Date of approval
S- Alla	14 April 2022
Jon Shortland	
Chief Officer Planning, Infrastructure and Economic Growth	

Description of activity:

The Local Plan 2040 rolls forward the overarching strategy for housing and employment development in the borough. It also includes site allocations and land designations in the borough, building on those adopted in the Local Plan 2030 (adopted January 2020). Adopted planning policies are also contained in the Allocations and Designations Local Plan and in a separate Minerals and Waste Local Plan. The majority of policies in existing plans will not be replaced by new policies in the Local Plan 2040. The Local Plan 2040 is a partial update of existing plans.

The Plan must be consistent with the National Planning Policy Framework and a range of other national policies and guidance documents that the government has published.

The Themes and Objectives of the Local Plan 2040 are as follows:

Theme 1: Greener – Working towards making Bedford a net zero carbon emissions borough whilst improving, enhancing and creating green infrastructure and spaces

Objectives:

Work towards making Bedford Borough a carbon neutral borough

Deliver high quality growth that integrates closely with the surrounding landscape, facilitating more sustainable and inclusive local communities, which can respond better to the impacts of climate and economic change and offer the opportunity to live healthier lifestyles.

Develop a strong and multi-functional urban and rural green infrastructure network through protecting, enhancing, extending and linking landscapes, woodland, biodiversity sites, heritage sites, green spaces and paths.

Improve access to green and blue infrastructure for the enjoyment and health of all.

Protect and enhance our natural resources including air, soil, minerals and water to minimise the impacts of flooding, climate change and pollution.

Move towards a greener town centre with enhanced connections to the river.

Theme 2: More accessible – Encouraging sustainable travel as well as taking the opportunities offered by strategic infrastructure for greater regional and national connectivity

Objectives:

Reduce congestion in the borough, particularly into and around the town centre, including making journeys by public transport, walking and cycling more attractive to encourage an increase in more sustainable and healthy modes of transport.

Improve East-West connectivity and enhance multi-modal travel through the construction of the East West Rail line routed through Bedford Midland station. Re-introduce faster north-south travel.

Improve "first mile / last mile" local connections to strategic infrastructure, allowing for easier access and greater integration

Theme 3: More prosperous – Supporting new business, educational and employment opportunities

Objectives:

Support a stronger local economy by building on the strengths of the emerging higher value clusters, to become a location for innovative businesses, with a strategically important employment site as a local innovation hub.

Allocate land to provide locations for the delivery of high value jobs.

Create a distinctive, attractive and multi-functional town centre for the future, with a focus on leisure, culture and visitor economy activities, and high quality urban living

Deliver the necessary health and social infrastructure to increase well-being in both the urban and rural areas of the borough.

Improve the borough's transport infrastructure in time to support growth in the local economy and to make the borough more attractive as a place to live and do business.

Theme 4: Better places - Developing high quality, well-designed and beautiful places for all to use and enjoy

Objectives:

Deliver the level of housing growth required by the Government's standard methodology calculation.

Support and create a high quality, inclusive and safe built environment which promotes healthy living, values and enhances local landscapes and settlement character, and which conserves and enhances the historic environment to be enjoyed by all.

Encourage the re-use of land that has been previously developed where it is viable and sustainable to do so.

Provide appropriate amounts and types of housing to meet the needs of the borough's urban and rural communities over the lifetime of the Plan making the housing stock more adaptable and resilient

Achieve a borough where everybody has appropriate access to high quality health and social care, as well as everyday essential services and community facilities, where social and cultural wellbeing are supported, enabling all residents to lead healthy and independent lives.

Summary of activity:

Summer 2020. As a first step in the preparation of the local plan, the Council prepared and consulted on an Issues and Options Paper. This asked for comments on the scope of the plan, six different kinds of location for growth and invited the submission of potential development sites to help the Council identify an available land supply for the plan period.

A further consultation was undertaken in 2021 to invite comments on preferred spatial strategy options and town centre policies. Several supporting documents were also published for consultation purposes, as were the potential development sites that had been submitted in 2020.

The supporting documents included a Development Strategy Topic Paper to explain the full range of development strategy options that had been considered.

The Summer 2022 consultation provides an opportunity for those with an interest to formally express support or objection to the plan's policies, ahead of a scheduled independent examination in public during 2023.

Please refer to the Equality Analysis Template Notes for guidance on completing this form.

Relevance Test

1. The outcomes of the activity directly and significantly impact on people, e.g. service users, employees, voluntary and community sector groups.	Yes	\square	No	
2. The activity could / does affect one or more protected equality groups.	Yes	\square	No	
3. The activity could / does affect protected equality groups differently.	Yes	\square	No	
4. One or more protected equality groups could be disadvantaged, adversely affected or are at risk of discrimination as a result of the activity.	Yes		No	\boxtimes
5. The activity relates to an area where there are known inequalities.	Yes		No	\square

The activity sets out proposals for significant changes to services, policies etc. and / or significantly affects how services are delivered.	Yes	\boxtimes	No	
7. The activity relates to one or more of the three aims of the Council's equality duty.	Yes	\boxtimes	No	
 The activity relates to the Council's Corporate Plan objectives, is a significant activity and / or presents a high risk to the Council's public reputation. 	Yes	\boxtimes	No	
9. An equality analysis of this activity is required.	Yes	\boxtimes	No	
This activity has no relevance to Bedford Borough Council's duty to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations. An equality analysis is not needed.				
Explanation why equality analysis is not needed				

Scope of equality analysis

Who is / will be impacted by the activity's aims and outcomes?	The issues covered in the Local Plan 2040 will impact on all residents in the Borough in addition to those who work in or visit the Borough. Accordingly, the Local Plan 2040 may potentially affect all members of the community who are covered by the protected characteristics as defined by the Equality Act 2010. These include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership groups as well as those with multiple protected characteristics.
	The local plan will result in new development happening in a planned way and the changes taking place throughout the plan period may affect residents, visitors and employees across the borough in a variety of ways, for example through new housing or employment development, new schools, new shops, roads, rail stations or cycle ways and open spaces. The plan's development strategy will lead to policies that change the character of land so that residents, visitors and employees within or near areas where land is allocated for development may experience increased economic and social opportunity. Conversely, decreased environmental opportunity may potentially be experienced by residents and employees as a result of the adverse effects of development, such as reduced air quality or increased noise and traffic. Primary stakeholders for the Local Plan 2040 include, in particular, residents, businesses, employers and employees, community groups, landowners,

	developers and the statutory consultation bodies for local plans
Which particular protected equality groups are likely / will be affected?	The proposed development strategy maintains a focus on growth in the urban area of Bedford and Kempston, particularly on brownfield sites. In the urban area the population is on average much younger, likely to include a higher proportion of mothers and mothers-to-be and comprise a larger proportion of faith and BME communities. In addition, the wards of Castle, Harpur, Cauldwell, Kingsbrook, Goldington, Queens Park and Roxton have local super output areas that score in the top 20% for one or more of the seven domains. Deprivation is most intense in the inner urban wards. It may therefore be considered that race groups, , the younger age groups and those suffering from deprivation may potentially be disproportionately affected by planned growth as a result of their
	geographic concentration in the urban area. The new local plan will also explain how provision will be made for Gypsies and Travellers. A new accommodation assessment has been completed to support the plan and to determine Gypsy and Traveller and Travelling Showpeople accommodation needs over the plan period. Whilst Gypsies and Travellers for planning purposes are defined in terms of their nomadic life style, Romany Gypsies and Irish Travellers are legally recognised as ethnic groups and therefore also protected by legislation. For the purpose of this Equality Analysis, Gypsies and Travellers are considered within the context of race groups.
	The Local Plan 2040 sets out policies that relate to achieving an appropriate mix of housing and accessibility, which is relevant to older people (age) and disabled people.

Evidence, data, information and consultation

What evidence have you used to	•	Population Census 2001 and 2011, ONS
analyse the effects on equality?	٠	Census and Statistics Information, BBC (Local Insight)
	•	Indices of Multiple Deprivation Report 2019 BBC
	•	Gypsy and Traveller Accommodation Assessment 2021
	•	Equality monitoring information of consultation across the wider Council in 2011

	National research reports
	 Bedford Borough Allocations and Designations Local Plan 2013
	Bedford Borough Local Plan 2030
	Bedford Borough Growth Plan 2018 - 2022
	 Local Housing Needs Assessment, ORS 2021 + Addendum
	Bedford Borough Housing Strategy 2021-26
	 Bedford Borough Care and Support Accommodation Strategies (learning disabilities, mental health, older persons)
What consultation did you carry out with protected equality groups to identify your activity's effect on equality?	In the past this is an issue discussed with the Diversity Network. Specific groups are encouraged to register their interest with the Council by asking for their details to be placed on the local plan email alert list. A recent update of the Council's Statement of Community Involvement also triggered a review of how we engage with protected equality groups.
	Public consultation has been carried out as outlined on page 4 above. The responses received largely focussed on locations for growth and potential allocation sites and did not identify any equality issues.
What does this evidence tell you	General
about the different protected groups?	The borough was home to an estimated total of 157,800 residents in 2011 who made up approximately 65,800 households. Population numbers had increased by approximately 6.5 % from 148,100 in 2001.
	ONS 2018 population projections, updated with data from the 2019 mid-year estimates of population, show that the overall population in Bedford Borough is projected to grow by 25,385 from 175,232 people to 200,618 people between 2020 and 2040. An increase of 15%.
	Age
	The population of the urban area is much younger on average than the rural area. Whilst borough wide the population is forecast to increase by 15% between 2020 and 2040, the majority of growth (64%) is associated with the older population, with the number of over 65s projected to increase by 16,157. This will represent a significant ageing of the population.

Single person households are over a third of the overall household growth: an increase of 5,400, including 3,010 with a household representative aged over 75 (56%).
Overall, 60% of the household growth is for households of single people and couples aged over 65.
Disability In August 2021 3,271 people claimed Disability Living Allowance and 3,115 people claimed Attendance Allowance. In October 2021 6,142 people received Personal Independence Payments
There will be an additional 12,205 households either needing adaptations to their existing housing or suitable new housing by 2040. Around 60% of these will live in dwellings that could be converted.
In 2011 16% of the Borough's population reported that they had a long term illness. In August 2021 1,271 people were claiming mental health related benefits.
The prevalence of physical disability increases with age. The highest percentages are found in older age groups so as population growth is expected to be concentrated in older age groups there is likely to be an increase in the proportion of disabled people. There is no evidence that disabled people are concentrated in any particular part of the urban or rural area and it is assumed that they are randomly distributed within those locations.
Race The 2011 Census indicates that 28.5% of the Borough's population is from around 100 different Black and Minority Ethnic (BME) groups (defined as all ethnic groups other than White British). This compares to 20.2% in England (though only 13.9% when the London Boroughs are excluded) and 14.7% in the East of England. The Borough's BME population increased significantly between 2001 and 2011, while the White British population declined by almost 6,900. There were substantial increases in all BME groups, including Asian and Asian British (48.6%) and Black and Black British (61.3%). In 2001 the BME population was concentrated in the urban area and particularly in the wards of Queens Park (57.8%) and Cauldwell (43.6%).

Gypsies and Travellers experience multiple disadvantages as is demonstrated by indicators relating to health, education and other issues. The existing Gypsy and Traveller community is located on the Council's own sites at Kempston Hardwick (22 pitches), at Willow Drift Meadow Lane (14 pitches) and a number of privately owned sites in the rural area. The 2021 based Gypsy and Traveller Accommodation Assessment evidences need for Gypsy and Traveller pitches to cover the period of the plan. It also evidences the need for Travelling Showpeople plots. **Religion or belief** The 2011 Census indicated that religious belief for the borough was as follows: Christian 59.3%, Muslim 5.5%, Hindu 1.5%, Sikh 2.1%, Jewish 0.1%, Buddhist 0.3%, Ravidassia 0.6%, other 0.4%, no religion 23.6%, not stated 6.6%. There is a strong correlation between certain religions and race: for example, many Pakistanis and Bangladeshis are Muslims, while many Indians are Hindu or Sikh. 2011 information shows that the composition of religion by ward varies greatly, with differences largely tied to ethnicity. For example, 41% of Queens Park ward residents are Muslim (3,500), and there are also large Muslim populations in Cauldwell (970), Castle (870) and Kingsbrook (840) wards. Almost 5% of Kempston Town residents are Sikh, and there is a large Hindu community in Cauldwell (460). There is a notable difference in the proportion of the population who are Christian between the urban (56%) and rural (65%) areas of the Borough. Again, this largely reflects their different ethnic compositions, but is also influenced by the older age profile of the rural area. The highest proportion of Christians is in Oakley (69%) ward, followed by Bromham & Biddenham and Putnoe (both 68%). The lowest is in Queens Park (37%). Sex (gender) The 2011 Census indicates that out of 158,000 residents, 80,200 are women (50.8%). There is no evidence that members of this group are concentrated in any particular area and it is assumed that they are randomly distributed. ONS mid-year estimates 2020 show that out of 174,687 residents, the percentage of women had remained the same (50.8%).

	Other identified groups The highest ranked areas for deprivation in the Borough are all in the urban area. They are located within the following wards – Castle, Harpur, Cauldwell, Kingsbrook, Goldington and Queens Park.
	Using the index of Multiple Deprivation, in 2019 21,988 people in the Borough lived in neighbourhoods ranked amongst the most deprived 20% of neighbourhoods in England (MHCLG).
What further research or data	As Census 2021 information becomes available, this EA will be reviewed and updated where
do you need to fill any gaps in	necessary.
your understanding of the	
potential or known effects of the	
activity?	

General Equality Duty

	Eliminate discrimination, harassment and victimisation	Advance equality of opportunity	Foster good relations
Age		The Local Plan 2040 is relevant to equality opportunity for older people. It contains policies that consider the needs of an ageing population through specialist housing provision.	
Disability		The Local Plan 2040 is relevant to equality of opportunity for disabled people. It contains policies that ensure accessibility in the development of sites and mixed dwellings that are accessible.	
Gender reassignment			
Pregnancy and			

maternity		
Race	The Local Plan 2040 considers the distinct housing needs of Gypsy and Traveller communities, with policies that set out provision for pitches.	The Local Plan 2040 policies contribute to fostering good relations between different ethnic groups, particularly through community infrastructure that promotes social integration and interaction.
Religion or belief		The Local Plan 2040 policies contribute to fostering good relations between and amongst religious communities, particularly through community infrastructure that promotes access to multi-faith uses of space and enables people to come together, promote social integration and interaction between people of different religion / belief, and those of none.
Sex		
Sexual orientation		
Marriage & civil partnership		

Impact on equality groups

Based on the evid	Based on the evidence presented what positive and negative impact will your activity have on equality?				
	Positive	Negative	No	Explanation	
	impact	impact	impact		
Age				The preferred development strategy focuses growth first in the existing urban area of Bedford and Kempston, therefore it may be considered that in particular the on	

de qu de (ir or de po pe fro re fa re fa ar op af ar op af ar op	verage younger population in the urban area may become affected by ecreased environmental opportunity, including traffic, noise and reduced air uality as result of future development. In combination, the 2030 and 2040 evelopment strategies also propose growth in some larger rural settlements including new settlements). The residents in the smaller rural settlements that are in average older may be adversely affected through increasing levels of eprivation in terms of access to essential services such as a GP, primary school, ost office or supermarkets, as well as access to suitably specialised older ersons housing, community facilities as well as other benefits that would result om growth. Similarly, little or no growth in rest of the borough may also result in aduced access to education provision, skills development, leisure and recreation acilities as well as employment opportunities for the younger age groups that are asident in the rural areas. edford Borough has an ageing population and currently almost 16% of ensioners in the borough are income deprived. This identifies the need for ffordable housing and suitably specialised accommodation for elderly people as n issue for the new local plan. The Local Plan 2040 continues to offer the poportunity to deliver homes that cater for the needs of older people. In addition, 20% of children in the borough are raised in income deprived ouseholds and the significant rise in the number of births, which is likely to result a rise in preschool and younger school age populations, may place pressure on xisting education facilities. The Local Plan 2040 may positively affect younger ge groups, including children suffering deprivation in terms of income, education nd skills through facilitating the delivery of new development that is likely to eliver new education facilities, apprenticeships or make financial contributions to ducation provision and improve the local skills base. It is therefore considered
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		seeks to achieve an appropriate housing mix. Policy 60 – Specialist Housing of the Local Plan 2030 remains unchanged. These policies set out criteria for developments to ensure dwellings over a specified number contain supported housing and self-contained housing for older people and set out criteria for residential institutions.
Disability		The Local Plan 2040 Policy DM3 will secure a range of different house types, including mobility housing. The plan also seeks to minimise the need to travel by directing development to sustainable locations. Where little or no growth is proposed in the smaller settlements, disabled persons resident in the rural area may potentially experience reduced access to essential services such as a GP, primary school, post office or supermarkets, and public transport. Facilitating the delivery of new development that is likely to require highway, transportation and green infrastructure / public realm improvements as well as sustainable links to rail stations, the plan strategy encourages continuity of movement, improved links between communities, access to and connectivity within places. Evidence suggests that the prevalence of disability increases with age and that the rural population is on average older than the urban population. It could be considered that as a result of growth in the urban and some rural areas, disabled persons in these locations may potentially experience positive impacts from new development, including suitable housing, new employment opportunities and improved accessibility.

Gender reassignment		Not relevant. There is no evidence that demonstrates that the preferred development strategy or the Local Plan 2040 policies are likely to affect this protected equality group.
Pregnancy and maternity		Not relevant. There is no evidence that demonstrates that the preferred development strategy or the Local Plan 2040 policies are likely to affect this protected equality group.
Race and Religion or Belief		The evidence suggests a strong correlation between faith groups and BME groups. The concentration of the faith groups and BME population in the urban area means that members of these protected equality groups may be in particular affected by decreased environmental opportunity as result of new development that is likely to focussed in the urban area, such as traffic and congestion, loss of open land, pollution, reduced air quality and noise, such as from traffic and construction. Those faith and BME groups that are resident in locations with little or no growth may additionally experience increased income, education and skills deprivation as well as reduced access to affordable and suitable housing, essential services and rural public transport. BME and religious communities may be positively affected by growth in the existing urban area through increased social and economic opportunity, including community infrastructure that promotes the right to worship, express religious belief and enables people to come together, promote social integration and interaction between people of different ethnicities and faiths. In addition, the greater the level of growth and quantum of development, the greater the level of social and economic opportunity that may be potentially experienced by race and faith groups in terms of access to suitable housing, employment and income. Local Plan 2040 policies HOU1, HOU2, HOU3, HOU4, promote the development for residential uses of accessible sites in the central area of Bedford. Policies HOU5, HOU6, HOU7, HOU8, HOU9, HOU10 promote the development for residential uses on other well-connected urban sites.

		considered. The Local Plan policies for new settlements at Kempston Hardwck and Little Barford (HOU14 and HOU19) require inclusion of pitches for Gypsies and travellers and travelling show people.
Religion or belief		See above
Sex		Not relevant. Men or women are not concentrated in any particular area. There is no evidence that demonstrates that the preferred development strategy or the Local Plan 2040 policies are likely to affect this protected equality group.
Sexual orientation		Not relevant. There is no evidence that demonstrates that the preferred development strategy or Local Plan 2040 policies impacts this protected equality group.
Marriage & civil partnership		Not relevant. There is no evidence that demonstrates that the preferred development strategy or Local Plan 2040 policies will impact this protected equality group.
Other relevant groups		Those suffering income, education and skills deprivation as well as health inequalities are primarily concentrated in Castle, Harpur, Cauldwell, Kingsbrook, Goldington and Queens Park, whilst two thirds of the rural population suffer deprivation in terms of access to essential services. In rural locations where little or no growth is proposed, rural deprivation may potentially worsen for those already deprived in terms of access to every-day services. Where growth is proposed in the urban area, those suffering income, education and skills deprivation as well as poor health and life expectancy may potentially be disproportionately affected by decreased environmental opportunity resulting from new development. Where the proposed development strategy concentrates growth first in the urban area, those suffering deprivation are likely be positively affected by the economic strengthening of growth concentrations through greater access to affordable

housing and employment opportunities. Town centre development especially has the potential to significantly enhance the economic strengths of the urban area and reduce unemployment and income deprivation in the urban area. In addition, new development is likely to encourage the provision of new health facilities that will benefit residents in the deprived wards, whose life expectancy is on average 9 years lower than in the rest of the borough. As a result of growth in the rural areas, improved accessibility to services may potentially benefit those suffering deprivation.
Policy 1S of the Local Plan 2030 requires Health Impact Assessments to be completed as part of sustainability appraisals and for all residential and mixed use sites over a specified number. This policy will remain part of the development plan.
Local Plan 2040 policies HOU1, HOU2, HOU3, HOU4, promote the development for residential uses of accessible sites in the central area of Bedford. Policies HOU5, HOU6, HOU7, HOU8, HOU9, HOU10 promote the development for residential uses on other well-connected urban sites.
Local Plan 2040 Policy DM1 sets out affordable housing requirements, having a positive impact for people from lower socio-economic groups.
Local Plan 2040 Policy DM2 ensures that affordable housing provision is maximised.

Commissioned services

What equality measures will be included in Contracts to help meet the three aims of the general equality duty?

What steps will be taken	N/A
throughout the commissioning	
cycle to meet the different	
needs of protected equality	
groups?	

<u>Actions</u>

	What will be done?	By who?	By when?	What will be the outcome?
Actions to lessen negative impact	Adopt and implement policies in the local plan to minimise the negative effects associated with development in different locations.	Planning Policy Team	In accordance with the published timetable for the preparation of the local plan	Adopted development plan policies to guide the location and detail of new development.
Actions to increase positive impact	Adopt and implement policies in the local plan to maximise the positive effects associated with development in different locations.	Planning Policy Team	In accordance with the published timetable for the preparation of the local plan	Adopted development plan policies to guide the location and detail of new development.
Actions to develop equality evidence, information and data	Review Census data and its relevance to the application of the Local Plan policies.	Planning Policy Team	As data is released.	Planning Policy Team
Actions to improve equality in	N/A			

procurement / commissioning			
Other relevant actions	N/A		

Recommendation

No major change required	The equality analysis has found that potential impacts both positive and negative have been identified. Negative effects on any equality groups relate primarily to the environmental impacts of development, such as reduced air quality, traffic and congestion or noise. These can be mitigated through the inclusion of appropriate policy criteria. There are specific Local Plan 2040 policies that have been developed to have a positive impact by considering the needs of older people, families with children, disabled people, Gypsy and Traveller communities and people from lower socio-economic groups. These are highlighted within the equality analysis.
Adjustments required	
Justification to continue the activity	
Stop the activity	

Summary of analysis

In preparing this report, due consideration has been given to the Borough Council's statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.

The development strategy and policies contained within the Local Plan 2040 have been considered in relation to their potential impacts on protected equality groups identified in relevant legislation, including age, disability, race, gender, religion and belief, sexual orientation, gender reassignment, pregnancy and maternity, marriage and civil partnerships, and those experiencing deprivation. Potential impacts both positive and negative have been identified. Negative effects on equality groups relate primarily to the environmental impacts of development, such as reduced air quality, traffic and congestion or noise. These can be mitigated through the inclusion of appropriate policy criteria, where necessary, and proposals for mitigation have been developed as part of the sustainability appraisal of the local plan.

Seeking local views and input on a range of issues, the consultation itself has a wide range of potential positive effects on all equality

groups and significantly contributes to social equality in promoting inclusiveness and views on matters such as community infrastructure, open spaces, employment and training opportunities, and in particular affordable housing. The groups that are likely to particularly benefit are those concentrated in or near the urban area and locations for growth. These are age groups, race and religious groups and those suffering deprivation.

Monitoring and review

Monitoring and review	Review date
The EA will be updated as new, more up to date information becomes available. Once adopted, the impact of the Local Plan 2040's policies will be monitored on a yearly basis through the Authority's Planning Monitoring Report.	A further EA will be produced if modifications are required to the plan as part of the formal examination process.