

Equality Impact Assessment (EqIA) form: the initial impact assessment

1. Process and guidance

The purpose of an EqIA is to make sure that the council is meeting the needs of all our residents by ensuring we consider how different groups of people may be affected by or experience a proposal in different ways. EqIAs help us to meet our [Public Sector Equality Duty](#) and where applicable the [Armed Forces Duty](#)

The council has a two stage EqIA process:

- Stage 1 - the initial impact assessment
- Stage 2 - the full impact assessment.

This form is for use at Stage 1 of the process. This must be completed when undertaking a project, policy change, or service change. It can form part of a business case for change and must be completed and attached to a Project Initiation Document. The findings of the initial impact assessment will determine whether a full impact assessment is needed.

Guidance and tools for council officers can be accessed on the council's [Tackling Inequality Together](#) intranet pages.

Date started:	June 2024
Completed by:	Ben Davis (Senior Planning Policy Officer)
Service:	Place and Growth
Project or policy EqIA relates to:	Local Plan Update (LPU): Proposed Submission Plan
Date EqIA discussed at service team meeting:	27 August 2024
Conclusion (is a full assessment needed?):	No

Signed off by (AD):	Trevor Saunders, Assistant Director, Planning
Sign off date:	29/08/24

2. Summary of the policy, project, or service

This section should be used to summarise the project, policy, or service change (the proposal).

What is the purpose of the proposal, what are the aims and expected outcomes, and how does it relate to service plans and the corporate plan?

The purpose of the Local Plan Update: Proposed Submission Plan is to guide how development will be managed in the borough over a period looking towards 2040. It identifies future development needs and includes policies providing details of how those needs are to be met, including through allocation of sites for housing and other uses. It also contains more detailed development management policies that will be used to guide what development looks like and functions. The plan will be used in making decisions on planning application in the borough alongside other local plans and make neighbourhood development plans.

The LPU Proposed Submission Plan comprises:

- Vision and objectives for the plan period 2023-2040
- Strategic matters (including sustainable development and locational principles, sites to be allocated for development to help meet needs (housing and economic development), infrastructure (including identifying areas of land to be safeguarded for strategic highway schemes) and climate change mitigation and adaptation
- Policies to assist guide what development looks like and functions, covering topics such as:
 - Development in the green belt and countryside
 - Flood risk and drainage
 - Design
 - Protection of existing housing stock, provision of specialist accommodation, including for Gypsy, Traveller and Travelling Showpeople, older people and those with additional support needs, rural exception sites, housing mix
 - Change of use within retail areas, and protection of community services and facilities (including a policy to protect green areas that are important to the local community, through Local Green Space designation)

- Heritage
- Natural environment (including biodiversity net gain and nature conservation, the Thames Basins Heath Special Protection Area, valued landscapes and green and blue infrastructure)
- Pollution
- Transport, movement and connectivity

The preparation of the LPU Proposed Submission Plan was informed by representations made in response to previous consultations and a broad technical evidence base. It must be consistent with national planning policy. Previous consultations have been accompanied by an EqlA Initial Impact Assessment.

The proposed put forward by various consultations have evolved over time to take account consultation comments from individuals, organisation and statutory bodies, changes to national planning policy and guidance or any updated evidence commissioned to support a policy approach. Each EqlA has evolved alongside to take account any changed in proposals. Since the EqlA for the Draft Local Plan, the following policies have either been combined with other policies, or are introduced as an additional policies in the LPU Proposed Submission Plan:

2020 EqlA	2024 EqlA	Comment
N/A	Policy SS1: Sustainable Development Principles	Policy added to the Proposed Submission Plan.
N/A	Policy SS3: Development within or adjacent to major and modest settlements	Policy added to the Proposed Submission Plan.
N/A	Policy SS4: Development within and adjacent to minor settlements	Policy added to the Proposed Submission Plan.
N/A	Policy CE1: Design principles for efficient buildings Policy CE4: Supporting a circular economy	A new chapter is included in the Proposed Submission Plan covering climate change and energy policies. Policies have been updated to reflect additional climate change evidence produced post draft plan consultation. The Proposed Submission Plan also introduces three additional policies covering design principles for efficient buildings, circular economy and embodied carbon.

	Policy CE5: Embodied carbon	
Policy DH7: Energy	Policy CE6: Reducing energy consumption in existing buildings	
Policy DH10: Low carbon and renewable energy generation	Policy CE7: Low carbon and renewable energy generation	Policy requirements have been incorporated into two individual policies covering the provision of low carbon and renewable energy and protection of renewable energy infrastructure.
	Policy CE8: Protecting renewable energy infrastructure	
N/A	Policy ER9: Woodley town centre and Lower Earley district centre	Policy added to the Proposed Submission Plan.
N/A	Policy H13: Retention of mobile home parks	Policy added to the Proposed Submission Plan.
N/A	Policy DH10: Equestrian development	Policy added to the Proposed Submission Plan.
Policy NE8: Development and flood risk (from all sources)	Policy FD1: Development and flood risk (from all sources)	A new chapter is included in the Proposed Submission Plan covering flood risk and drainage policies. Policy requirements have been separated into three individual and specific policies covering development and flood risk, sustainable drainage and river corridors and watercourses.
	Policy FD2: Sustainable drainage	
	Policy FD3: River corridors and watercourses	
Policy NE1: Biodiversity and nature conservation	Policy NE1: Biodiversity and geodiversity	Policy requirements have been separated into two individual policies. Policy NE1 sets out the overall approach to biodiversity and geodiversity in development. Policy NE2 is a bespoke policy on biodiversity net gain.
	Policy NE2: Biodiversity net gain	

Policy NE3: Trees, woodland and hedgerows	Policy NE4: Trees, woodlands, hedges and hedgerows	Policy requirements have been combined into a single policy covering trees, woodlands, hedges and hedgerows.
Policy NE4: Development and existing trees, woodland and hedgerows		
Policy NE6: Landscape character, value and green routes	Policy NE6: Valued Landscapes	Some elements of the policy have been combined into Policy NE5: Landscape and Design. A bespoke policy is included in the Proposed Submission Plan on Valued Landscapes.
N/A	Policy HC10: Odour, fumes and dust	Policy added to the Proposed Submission Plan.
Policy MW1: Sustainable waste management	N/A	Policy removed from the Proposed Submission Plan as superseded by the adopted Minerals and Waste Local Plan.
Policy MW2: Minerals resources and infrastructure	N/A	Policy removed from the Proposed Submission Plan as superseded by the adopted Minerals and Waste Local Plan.

These changes have been assessed as part of the EqIA and have not resulted in any negative outcomes for any of the protected characteristics and, in some cases, have assured a more positive outcome.

Publication of the LPU Proposed Submission Plan would occur if approved by Council. In accordance with statutory requirements, the consultation period would be six weeks. Following the consultation period, all representations received will be submitted to the Secretary of State for examination, which will be conducted by an appointed Planning Inspector. The LPU Proposed Submission Plan and supporting evidence base will also be submitted.

The publication of the LPU Proposed Submission Plan is a legal requirement under Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012. The publication and consultation will be undertaken in line with the principles set out in the council's Statement of Community Involvement (SCI) and all relevant legislation and regulations governing that process. The publication will be supported by a detailed Communications Plan setting out the purpose of the publication stage and how to respond.

The Communications Plan will set out how the publication will take place and supporting actions. The CEM Plan will set out the overall programme for the publication period, including details of any events and engagement with stakeholders, local communities, town and parish

councils. The CEM Plan will also set out the methods for communication and engagement on the Proposed Submission Plan, including social media, press and news releases and website update.

How will the proposal be delivered, what governance arrangements are in place and who are the key internal stakeholders?

The publication of the LPU Proposed Submission Plan will be undertaken in accordance with the council's Statement of Community Involvement (SCI) which guides how the council will engage on planning matters, including the preparation of local plans. A summary of the proposed wider public engagement is set out in the previous section. To summarise briefly, the publication will involve seeking feedback from a range of interested organisations and other parties (including general and specific consultation bodies specified in the Regulations) on the plans legal compliance and soundness as defined in national planning policy.

Members have been given the opportunity to engage with and steer the evolution and preparation of the plan through a cross-party Planning Policy Member Working Group. Other internal stakeholders have been engaged on a general or specific basis, such as policy development including the Place and Growth Leadership Team, Corporate Leadership Team and lead specialist officers across other service areas in the council.

Publication of the LPU Proposed Submission Plan will generate comments from individuals and organisations (including statutory bodies). Following review, the council may, where necessary, recommend modifications or minor changes to the plan, which will be submitted to the appointed Planning Inspector.

Who will be affected by the proposal? Think about who it is aimed at and who will deliver it.

The LPU Proposed Submission Plan has been produced by Growth and Delivery Team (Planning Policy), with the input of internal officers, communities and stakeholders, and has evolved as a result of engagement and technical evidence. Once adopted all residents will benefit from having a new local plan, ensuring that planning policy remain effective in managing decisions by the council, and where necessary, inspectors through planning appeal process. This will provide greater certainty on the future delivery of development across the borough, including new housing, infrastructure, jobs and services and facilities.

The adoption of a new local plan would reduce the risk of unplanned, speculative planning applications and appeals granted in the borough. This can often lead to housing and other forms of development being allowed in poorer locations, being of lower quality and in places where infrastructure cannot be improved to deal with impacts, e.g. pressures on roads, schools and community facilities.

Planning policies in the new local plan will provide a clear reference point for any town or parish council that is considering preparing a neighbourhood development plan or neighbourhood development order.

3. Data & Protected Characteristics

This section should be used to set out what data you have gathered to support the initial impact assessment.

The table below sets out the equality groups that need to be considered in the impact assessment. These comprise the nine protected characteristics set out in the Equality Act 2010 and other priority areas defined by the council.

Age	Armed Forces Communities	Care Experienced People	Disability
Gender Reassignment	Marriage and Civil Partnership	Pregnancy/Maternity	Religious belief
Race	Sex	Sexual Orientation	Socio-economic disadvantage

The Armed Forces Act 2021 requires consideration of the [impact on Armed Forces Communities](#) when exercising certain housing, education or healthcare functions (excluding social care). Further guidance can be found [here](#).

What data and information will be used to help assess the impact of the proposal on different groups of people? A list of useful resources is available for officers on the Council’s Tackling Inequality Together intranet pages.

Secondary datasets and information from trusted sources will be used to assess the LPU’s impact on different groups. Examples include:

- The Office for National Statistics (ONS) e.g., 2021 Census
- Wokingham Local Housing Needs Assessment (LHNA)
- Wokingham Local Plan Sustainability Appraisal (SA)
- Health Impact Assessment (HIA)
- Berkshire Health and Wellbeing Strategy
- Wokingham Health and Wellbeing Strategy

4. Assessing & Scoring Impact

This section should be used to assess the likely impact on each equality group, consider how significant any impacts could be and explain how the data gathered supports the conclusions made.

Scoring impact for equality groups	
Positive impact	The proposal promotes equality of opportunity by meeting needs or addressing existing barriers to participation and/or promotes good community relations
Neutral or no impact	The proposal has no impact or no disproportionate impact.

Low negative	The proposal is likely to negatively impact a small number of people, be of short duration and can easily be resolved.
High negative	The proposal is likely to have a significant negative impact on many people or a severe impact on a smaller number of people.

Referring to the Scoring table above, please give an impact score for each group, explain what the likely impact will be, and briefly set out how the data supports this conclusion.

Equality group	Impact score	Impact and supporting data
Age	Positive impact	<p>There is likely to be a positive impact.</p> <p>The LPU Proposed Submission Plan has been informed by evidence studies, for example the Wokingham Local Housing Needs Assessment 2023 that looks at the needs for affordable housing, accommodation for students, younger people, families, older people and people with additional support / needs.</p> <p>The delivery of development within the Strategic Development Locations and other additional housing allocations will include a higher proportion of affordable housing than could otherwise be achieved, which is an important part of ensuring that no particular groups are unfairly disadvantaged and will create inclusive and balanced communities.</p> <p>Policies in the LPU recognise the need to meet the identified needs of different groups within the community or enable specific needs to be met within new communities (which is likely to include older people, younger people and people with additional support / needs). The addition of new homes will provide opportunities for first time buyers.</p>

Equality group	Impact score	Impact and supporting data
		<p>A policy is included in the plan to provide specialist accommodation, including a proportion of new homes constructed to meet wheelchair and accessibility standards in order to provide homes suitable for those with physical disabilities and for older persons.</p> <p>A policy is included in the plan to support an appropriate mix of dwelling types and sizes to meet the needs of current and future households. This will be beneficial to groups, especially those with younger families and the ageing population.</p> <p>The plan includes policies on play space, open space, leisure and sports facilities, protection of community services and facilities. A Local Green Space policy is also included in the plan to protect areas of green space that are recognised as being demonstrably special to the local community, predominantly due to their recreational value. Examples include country parks, play areas, recreation grounds and Suitable Alternative Natural Greenspace (SANG).</p> <p>The plan also includes a policy relating to place-making and design, to ensure the design of buildings and places are accessible and inclusive for all users, including people of all ages.</p> <p>Proposed housing site allocations will need to mitigate their impact as appropriate, for example education facilities and youth facilities. Both Loddon Valley Garden Village and South Wokingham SDLs require the delivery of primary school and secondary school education on-site. The SDLs will deliver a mix of housing to meet different needs within the new community and significant infrastructure including open space, education, youth facilities and other services to accommodate all ages within the new community.</p> <p>Policies are included on climate change adaptation, mitigation and design measures to combat the effects of changing weather patterns, increasing resilience to climate</p>

Equality group	Impact score	Impact and supporting data
		<p>impacts. This could be particularly beneficial to younger people, people with disabilities and the ageing population who are likely to be more susceptible to changes in temperatures and extreme weather conditions.</p>
Disability	Positive impact	<p>There is likely to be a positive impact.</p> <p>The LPU Proposed Submission Plan includes policies relating to affordable housing, housing mix and specialist accommodation for older people and those with additional support needs.</p> <p>Policies in the LPU recognise the need to meet the identified needs of different groups, or enable needs to be met, including older people, people with physical, mental or learning disabilities and other people with additional support needs, and has been informed by evidence studies, for example the Wokingham Local Housing Needs Assessment 2023.</p> <p>A policy is included in the plan to support the provision of specialist accommodation for older people and those with additional support needs, who suffer from issues such as reduced mobility and dementia. Requirements are also set in the policy for a proportion of new homes to be constructed to meet wheelchair and accessibility standards in order to provide suitable homes for those with physical disabilities and for older persons.</p> <p>The plan includes a policy relating to placemaking and design, which ensures the design of buildings and places are fully accessible and inclusive for all users, including people with mobility impairments or other health issues.</p>
Gender reassignment	Neutral or no impact	<p>It is not envisaged that the LPU Proposed Submission Plan would have any impacts upon this group.</p>

Equality group	Impact score	Impact and supporting data
Marriage and Civil Partnership	Neutral or no impact	It is not envisaged that the LPU Proposed Submission Plan would have any impacts upon this group.
Pregnancy/Maternity	Positive impact	<p>Potential for some positive impacts.</p> <p>Proposed housing site allocations within the LPU Proposed Submission Plan will need to mitigate their impact as appropriate, which may include new / improved community services and facilities (which have ability to be used by health practitioners and children's / nursery facilities).</p> <p>The Loddon Valley Garden Village will also deliver substantial infrastructure, services and facilities, including a district centre to provide a range of services and facilities, such as health uses.</p> <p>Policies are included in the plan to improve accessibility and infrastructure, which are likely to benefit those with reduced mobility. Policies related to green and blue infrastructure and walking and cycling are designed to meet the needs of all users, which may include pregnant women and those with babies / younger children.</p> <p>The design and place-making policy ensures that buildings and spaces are accessible and inclusive for all users, which may include pregnant women and those with babies / younger children.</p>
Religious belief	Positive impact	<p>Potential for some positive impacts.</p> <p>Proposed housing site allocations within the LPU Proposed Submission Plan will need to mitigate their impact as appropriate, which may include improved / new community facilities (which could be used by all sectors of the community). The Loddon Valley Garden Village will provide substantial infrastructure and services,</p>

Equality group	Impact score	Impact and supporting data
		<p>including a district centre and local centres providing a range of services and facilities, including cultural uses.</p> <p>A policy is included in the plan to protect existing community services and facilities which would include places of worship.</p>
Race	Positive impact	<p>There is likely to be a positive impact.</p> <p>The LPU Proposed Submission Plan has been informed by evidence, including a Gypsy and Traveller and Travelling Showperson Accommodation Assessment (August 2023), which has involved consultation with the Gypsy and Traveller community.</p> <p>The plan seeks to meet the identified needs of different groups, or enable their needs to be met, within existing and new communities. This may include Gypsies, Travellers and Travelling Showpersons and houseboat dwellers. The plan includes specific allocations for Gypsy and Traveller pitches. In addition, the Loddon Valley Garden Village, Arborfield Green SDL and South Wokingham SDL policies require Gypsy and Traveller pitches to be delivered as part of the overall development proposal.</p>
Sex	Neutral or no impact	It is not envisaged that the LPU Proposed Submission Plan would have any impacts upon this group.
Sexual Orientation	Neutral or no impact	It is not envisaged that the LPU Proposed Submission Plan would have any impacts upon this group.
Socio-economic disadvantage	Positive impact	<p>There is likely to be a positive impact.</p> <p>The LPU Proposed Submission Plan includes several policies on housing to ensure development proposals create mixed and balanced communities, and to meet the</p>

Equality group	Impact score	Impact and supporting data
		<p>particular needs of people working and living in the borough. This can include families, single parent families, households with low incomes, first time buyers etc.</p> <p>The affordable housing policy is supported by local evidence, in the form of a Local Housing Needs Assessment, and ensures an adequate supply and access to affordable housing products, that are located to create mixed and balanced communities. The provision of affordable housing will meet the nationally described spaces standards, reducing risk of overcrowding.</p> <p>A policy on housing mix, density and standards is included to ensure proposals provide an adequate mix of housing types and sizes to create inclusive and mixed communities to meet needs of existing and new residents. The policy is supported by local evidence in the Local Housing Needs Assessment.</p> <p>A policy on specialist accommodation is also included which sets out a criteria-based policy for the provision of specialist accommodation to meet older persons, or those with additional support needs, such as people with learning disabilities, homeless people etc. The Plan also supports adaptations to existing housing stock allowing people to remain in the borough and their community.</p> <p>The sub-division and conversion of dwellings policy will create additional homes at lower cost, of particular benefit to lower income groups, such as younger people and retired people and other smaller households.</p> <p>The plan also includes a policy on exception sites, aimed at providing homes for local people who are unable to rent or buy a property in the open market, particularly in more rural locations.</p> <p>The plan also includes the safeguarding of employment / services on existing Core Employment Areas, to ensure opportunities remain at a local level.</p>

Equality group	Impact score	Impact and supporting data
		<p>There is also policy support for employment and skills plans to be produced through new development proposals, that provide opportunities for training, apprenticeships to develop local skills. This is likely to assist in reducing unemployment and deprivation in the borough, particularly younger people who are not in education, employment or training, and those with limited literacy or numeracy skills.</p> <p>Policies on active travel, walking and cycling encourage sustainable modes of travel to reduce reliance on private cars, and to improve connectivity to settlements and the countryside and access to services and facilities. The Plan recognises the need for proposals to protect Public Rights of Way, green routes and Greenways as they are a valued resource for residents, visitors and workers to access recreation, local employment opportunities and local services and facilities.</p> <p>Policies are included on climate change adaptation, mitigation and design measures to combat the effects of changing weather patterns, increasing resilience to climate impacts. Improving energy efficiency in buildings is likely to support families or households with lower incomes.</p>
Armed Forces Communities	Neutral or no impact	It is not envisaged that the LPU Proposed Submission Plan would have any impacts upon this group.
Care Experienced People	Neutral or no impact	It is not envisaged that the LPU Proposed Submission Plan would have any impacts upon this group.

5. Conclusion and next steps.

Based on your findings from your initial impact assessment, you must complete a full impact assessment if you have identified any groups as having a low or high negative impact.

If no impact, or a positive impact has been identified, you do not need to complete a full assessment. However, you must include reference to the initial assessment in any associated reports, and it must receive formal approval from the Assistant Director responsible for the project, policy, or service change.