

Amen Corner Area Action Plan

Regulation 27 – Publication of a development plan document

And

Regulation 30 – Submission of documents and information to the Secretary of State

Evolving Equality Impact Assessment (to be completed upon Adoption)

January 2009

1 Introduction

The Council's Approach to Equalities

- 1.1 Bracknell Forest has a clear vision of its future – a vision for everyone.
- 1.2 Bracknell Forest's Sustainable Community Strategy includes "ensuring everyone has similar opportunities" and the Council's vision is "to make Bracknell Forest a place where all people can thrive; living, learning and working in a clean, safe and healthy environment." The Council has made a strong commitment to ensuring that there are opportunities for everyone who lives and works in the Borough as well as providing the best possible public services.
- 1.3 The Council recognises that excellence in public services can only be achieved by ensuring that everyone, whatever their background and circumstances, can access them. Wherever possible the Council therefore strives to:
 - Eliminate unfair discrimination
 - Promote equal opportunities for everyone
 - Promote good relationships between people.

The Equality Impact Assessment Process

- 1.4 The Council has published guidance (Service Improvement through equality Impact Assessments – EIA Guidance – version 1, 05.08.08) which sets out a 6 step process for Equality Impact Assessment. The following provisions in this report follows that 6 step process, in as far as it is relevant.
- 1.5 The steps involved concern:
 - Initial Screening;
 - Scoping and Defining;
 - Information Gathering;
 - Making a Judgement;
 - Action Planning;
 - Publication and Review.
- 1.6 The process focuses on the main groups who traditionally experience disadvantage to try to find out whether or not they are benefiting from the Council's functions and service provision and from project, strategy or policy gestation.
- 1.7 The groups and target areas involved include:
 - Race and ethnicity;
 - Disability;
 - Gender;
 - Age;
 - Sexual orientation;
 - Religion and belief.
- 1.8 These groups offer a framework for considering potential impact; however, in certain instances it will be necessary to establish whether there are further equalities groups that also warrant consideration.

Equality Impact Assessment Preparation

- 1.9 This report is the result of a full equality impact assessment carried on the Amen Corner Area Action Plan draft Submission report which results from the inclusion of Policy CS4 (land at Amen Corner) in the Bracknell Forest Borough Local development Framework, Core Strategy Development Plan Document (Adoption February 2008). Whilst the Core Strategy was not the subject of a formal Equality Impact Assessment as its preparation pre-dated the legislation requiring an assessment, the Strategy was the subject of iterative including the examination of social considerations. The Core Strategy was the subject of an Equality impact Report in recognition of the then impending Equality Legislation.
- 1.10 Given the relatively limited nature and extent of the Amen Corner Area Action Plan, this report has been prepared by the Development Plan Team Manager, who had management, rather than direct, involvement in the preparation of Plan. The preparation of the report has been under the direction of the Head of Spatial Policy and included input from the Environmental Policy Officer and the principal document author. The report has also been reviewed by the Environment, Culture and Communities' Departmental Equality Representative and the Corporate Community Engagement and Equality Team. An emerging Equality Impact Assessment Report (08 January 2009) accompanied the Amen Corner Area Action Plan draft Submission report when approved by the Executive on 20 January 2009 and endorsed by Council on 28 January 2009 for Publication and Submission.
- 1.11 This report will be published alongside the Amen Corner Area Action Plan draft Submission report and Submission document and any representations received will be used to review the Equality Impact Assessment and feed into the final Equality Impact Assessment Report at Adoption.

2 Initial Screening

Purpose

- 2.1 Initial screening needs to take place for all existing, new and revised policies, strategies, procedures and functions. This stage will determine whether or not the activity is relevant to the equalities duties and therefore if it is necessary to carry out a full Equality Impact Assessment.

Initial Considerations

- 2.2 To complete the initial screening, it is necessary to first ascertain:
- What the activity is seeking to achieve; and
 - Who in the main will benefit from the activity.
- 2.3 Preparation of the Amen Corner Area Action Plan is necessary to support the implementation of the provisions of Policy CS4 (Land at Amen Corner) of the Local Development Framework Core Strategy.
- 2.4 Implementation of Policy CS4 will promote sustainable development consistent with the Spatial Objectives of the local Development Framework.
- 2.5 Given the Spatial Objectives underpinning the preparation of the Amen Corner Area Action Plan, it can be seen that the emerging document is inherently inclusive and promoting equality of opportunity.

Beneficiaries and Outcomes

- 2.6 The Amen Corner Area Action Plan is intended to benefit not only future residents and workers at the site but also the wider population of, and visitors to, the Borough through for example, the provision of schooling, jobs, homes, open space and community facilities.

Key Matters

- 2.8 The Council's Equality Impact Assessment Guidance indicates that two key questions now need to be assessed. The first of these key questions is: Does the activity have the potential to cause adverse impact or discriminate against different groups in the community? The second key question is: Does the activity make a positive contribution to equalities?
- 2.9 The simple answer to each question is yes – either of which response necessitates a full Equality Impact Assessment to be undertaken. For example, in respect of the first question, if not properly undertaken, say by the provision of inaccessible buildings or facilities, those with a disability might be excluded from the development at Amen Corner. However, in respect of the second question, given the content of paragraphs 2.3 to 2.6 above, it is obvious that the emerging Area Action Plan, and the Core Strategy which underpins it, have been prepared with the intention of promoting equality of opportunity.

3 Scoping and Defining

- 3.1 Having determined to undertake a full Equality Impact Assessment, it is necessary to review:
- the overall aim of the Amen Corner Area Action Plan;
 - the beneficiaries of the Plan; and
 - the desired outcomes for those beneficiaries.

Aim and Objectives

- 3.2 As indicated at paragraph 2.3, preparation of the Amen Corner Area Action Plan is necessary to support implementation of the provisions of Policy CS4 (Land at Amen Corner) of the Local Development Framework Core Strategy. This policy identifies a major location for growth that will result from comprehensive, well designed, mixed use development including:
- Residential;
 - Employment;
 - Social and physical infrastructure;
 - The protection of a Strategic Gap between Binfield/Bracknell and Wokingham; and
 - Measures to avoid and mitigate the impact of the residential development upon the Thames Basin heaths Special Protection Area.
- 3.3 Implementation of development under the aegis of the Amen Corner Area Action Plan will promote sustainable development consistent with the Spatial Objectives of the local Development Framework, including (inter alia):
- To plan for a balance of housing and employment growth;
 - To aid the delivery of housing in the Borough, which meets the needs of all sectors of the community, including the provision of affordable housing;
 - To promote a transport system which enables access to services , by a choice of transport modes;

- To ensure high quality and well designed development is delivered in the Borough;
- To support and facilitate essential community facilities and infrastructure in accessible locations; and
- To deliver accessible development meeting the needs of the Borough.

3 Information Gathering

Consultation with Stakeholders

- 3.1 Legislation requires that consultation takes place with appropriate stakeholders as part of the EqIA process. Fortuitously, the Local Development Framework preparation process is set out in Regulations which includes methods of consultation and public participation which have been undertaken in accordance with the Council's approved Statement of Community Involvement.
- 3.2 The Local Development Framework (LDF) database includes over 3000 consultees. The database is constantly under review and is being expanded as and when additional stakeholders are identified and contacts established. All LDF stakeholders were notified of the commencement of preparation of the Amen Corner Area Action Plan and asked to confirm whether they wished to continue to be notified of its progress. Consultation undertaken to date and responses received, including those relating to Equality Impact, have been detailed in a published Regulation 30(1)(d) (under the Town and Country Planning (Local Development) (England) Regulations 2008) Statement of Consultation
- 3.3 Relevant Equality Impact matters raised to date under the Amen Corner Area Action Plan consultations include:
- The provision of, and access to, social facilities (e.g. support for the positive impact of providing such facilities but also the concern that new provision may adversely impact on existing provision) (see Table 1 which provides details of the possible impacts); and,
 - Provision for travelling populations.

Other information

- 3.4 The Council's guidance on undertaking Equality Impact Assessments contains many sources of information which might be useful in making an equality impact judgement. In this case, given the relatively limited nature and extent of the Amen Corner Area Action Plan and the scarcity of equality impact information affecting similar development implementation plans, it is suggested that, of this list, only local demographics might be useful for further consideration.
- 3.5 Reference can also be made to the provisions of the Amen Corner Area Action Plan.

Local Demographics

- 3.6 Appendix 1 provides an up-to-date equality background survey of local demographics for the Borough in comparison with those at the regional and national level. The implementation of the Area Action Plan will not discriminate against the population of groups within the population existing or new. The development will involve creating a new community which will likely be consistent

to proportions and trends and will contribute positively to the diverse make up of Bracknell Forest Borough.

Table 1 Provisions of the Amen Corner Area Action Plan

ACAAP Submission Policy	Draft	Equality Impact	Group Involved	Mitigation
Link to Adopted Core Strategy		Neutral – promotes Sustainable Development, subject to SA including social considerations	All	N/A
AC1 – Delivery of Comprehensive Development (But see AC9 – Housing Provision)		Positive: comprehensive mixed-use development; at least 725 dwellings including affordable housing; around 35000 sq m of employment and leisure; local centre; transport improvements; primary school; community and recreational facilities	Specifically – Children Generally - All	N/A
AC2 – Community Facilities, Services and Infrastructure		Positive: provision of facilities for Primary School, Recreation, Recycling, Library, Youth Facility, Secondary School, Health, Police, Fire and Utilities	Specifically - Children Generally – All	N/A
AC3 – Design Principles		Positive: Layout to respect topography Building for life Criteria Accessible to all Connecting to highway network	Specifically – Disability Generally – All	N/A
AC4 – Green Infrastructure and Landscape Character		Positive: Enhance physical and visual amenity; Open Space of Public Value Gardens and communal allotments	All	N/A
AC5 – Landscape Sensitivity		Positive: Visual amenity Protection from visual and noise pollution	All	N/A
AC6 – Biodiversity		Positive: Education purposes	All	N/A
AC7 – Thames Basin Heaths SPA		Positive SANGS provision	All	N/A

	Extend footpath network		
AC8 – Site Investigation and pollution remediation	Positive: Mitigate ground and noise contamination	All	N/A
AC9 – Housing Provision	Positive: Mix of type, sizes and tenure Some to Lifetime Homes standard Mixed and balanced community Negative: No provision for Travelling Populations	All Travelling Populations	N/A Proportionality: Emerging partial review of South East Plan suggests 15 pitches and 2 plots in Borough Provision dependent on a Site Allocations DPD
AC10 – Employment Provision	Positive Commercial and Leisure Zones; Local Centre; Links to surroundings	All	N/A
AC11 – Public Transport and Accessibility	Positive: Public Transport hub; Re-routed and additional bus service; Priority for buses Pedestrian and cycling provision and priority; Connection to Country Park	All	N/A
AC12 – Site Access and Other Highways Works	New and enhanced access to surroundings; General improvements to wider network	All	N/A

4 Making a Judgement

- 4.1 This stage in the assessment is acknowledged as being the most important and will be used to decide whether or not there is potential for the Amen Corner Area Action Plan to result in a less favourable outcome on any group within the community or for unlawful discrimination.
- 4.2 The Amen Corner Area Action Plan has been prepared in accordance with the provisions of the Bracknell Forest borough Local Development Framework Core Strategy. The Core Strategy has been the subject of Sustainability Assessment which included an examination of social considerations and found to be “sound”.
- 4.3 Consideration of the preceding Sections of this assessment indicates that:

- like the LDF process undertaken to date, the Amen Corner Area Action plan is inherently inclusive;
 - previous consultations have raised the issue of community facilities potentially having a positive, and a negative impact, and the situation in respect of Travelling Populations;
 - examination of the provisions of the Amen Corner Area Action Plan has identified similar conclusions and indicated that the issue of accessibility is adequately addressed, and
 - the Equality background survey of local demographics has not raised particular problems which require remedy through the Amen Corner Area Action Plan (see paragraph 3.6 and Appendix 1).
- 4.4 There is some acceptable positive impact in respect of certain groups; for example, the provision of schooling for children.
- 4.5 With regard to the provision of community facilities, whilst there is support for this provision, no evidence has been submitted to substantiate the claim that other existing community facilities will suffer, presumably as a result of over-supply of facilities. In fact, the planning requirements are that facilities should only be sought from development that are directly related in scale and kind to the development itself. So in effect, the Amen corner Area Action plan only seeks to “consume its own smoke”, not act as a drain on existing provision.
- 4.6 With regard to Travelling Populations, on the grounds of proportionality, non-provision in the Amen Corner Area Action Area should not be seen as an unacceptable less favourable outcome for this particular group. Provision in the Borough for Travelling Populations is being examined at present under a partial review of the South East Plan which, depending on the options being tested, provides for between 6 and 17 pitches for gypsies and travellers and between 4 plots in Berkshire and 2 plots in Bracknell Forest for Travelling Showpeople (a maximum of 17 pitches and plots during the period 2006 – 2016 relative to an allocation of 11000 dwellings during the period 2006 - 2026). The Council will be preparing a Local Development Framework document which will detail site allocations for all forms of development including proposals for Travelling Populations. Preparation of this site allocations document will allow for the identification of sites and for selection following sustainability appraisal which will allow each site to be compared relative to each other site thereby enabling the optimum site(s) to be allocated. This is considered to be a better way of considering the requirements of Travelling Populations.

5 Action Planning

- 5.1 It is accepted that the value of Equality Impact Assessment comes from the actions that will take place and the positive changes that will occur. With regard to the positive impacts that will result from the Amen Corner Area Action Plan these will come about as a result of the associated Implementation and Phasing Plan which will oversee its implementation.
- 5.2 The only matter which requires action planning is that concerning Travelling Populations. To ensure the action plan is implemented, there are certain steps that need to be undertaken, as follows:
- the action needs to be attributed to a key person/post who will be responsible for its completion;
 - an achievable timescale must be chosen;
 - milestones should be set for appropriate activities and progress; and

- the cost implications must be addressed.

Responsibility

- 5.3 Local Development Framework preparation is undertaken by the Spatial Policy Section in the Planning and transport division of the Environment, Culture and Communities Department. It would be reasonable for the Chief Officer: Planning and Transport/Head of Spatial Planning to take responsibility for the allocation of land for travelling populations.

Timescale and Milestones

- 5.4 The Council is presently reviewing its Local Development Scheme (the three year Local Development Framework timetable and work programme). Subject to no changes by Executive (17 March 2009) it is expected that a Site Allocations DPD, which would include provisions concerning Travelling Populations, will be commenced in April 2009 and following evidence gathering would be published for Public Participation (consultation) in November and December 2009 with consideration of representations during January to April 2010. The document would then be held in abeyance pending Examination of underlying spatial policy before being Submitted in December 2011, Examination in April – May 2012 and Adoption in December 2012. It is proposed that the same timetable and milestones be used for the Equality Impact Assessment Action Plan, in the knowledge that this timescale follows a Government Office template and, dependent on the Examination of the underlying spatial policies, could be shortened.

Cost Implications

- 5.5 The cost of any pitches/plots provided by private individuals or Registered Social Landlords (RSLs) will fall to those individuals/RSLs. The cost of any plots/pitches provided by the Council will fall to the Council although they may be administered by RSLs on the Councils behalf. There are Government grants (up to 100% for new provision subject to a maximum) available for the provision of pitches for some Travelling Populations. This matter will be examined further prior to the finalisation of this assessment and will be fully considered in the Infrastructure Plan which will accompany the Site Allocations DPD.

Amen Corner Area Action Plan Travelling Populations Action Plan

Responsibility	Milestone	Timescale	Costing
Chief Officer: Planning and Transport	Commence	April 2009	Requires further
	Evidence gathering	April – Oct 2009	consideration
	Public Participation	Nov – Dec 2009	including
OR	Consider responses	Jan – April 2009	private/public
	Submission	December 2011	provision and
Head of Spatial Policy (to be determined when both in post)	Examination	April – May 2012	availability/amount of
	Adoption	December 2012	Government Grant

6 Publication

- 6.1 This assessment is being published with the Amen Corner Area Action Plan draft Submission Report. Further iterations of the assessment will be prepared as Equality issues arise or alongside other relevant stages in the plan preparation

process; for example, prior to Adoption, when an Equality Impact Assessment Report will be completed. A summary of this Equality Impact Assessment will also be made available on the Council's website.

- 6.2 This Assessment, including the Action Plan will be monitored through the Environment, Culture and Communities Departmental Performance Management Report.

Appendix 1 Equality background survey of local demographics for Bracknell Forest Borough

Population

Gender	Total	Proportion	Commentary
All Persons	113,500	100%	
Males	56,300	49.6%	Higher proportion than the South East (49.2%) and a lower proportion than for England (49.2%)
Females	57,300	50.5%	Lower proportion than the South East and England (51% & 50.8% respectively)

Source: Mid-Year Population Estimate 2007 ONS (Table 9)

Population

Age	Total	Proportion	Commentary
All Ages	113,500	100%	N/A
Aged 0	1,500	1.3%	Higher proportion than the South East and England (both 1.2%)
1-4	5,700	5%	Higher proportion than the South East and England (both 1.2%)
5-9	7000	6.2%	Higher proportion than the South East and England (at 5.7 and 5.6% respectively)
10-14	7600	6.7%	Higher proportion than the South East and England (at 6.2 and 6.1% respectively)
15-19	8100	7.1%	Higher proportion than the South East and England (both 6.6%)
20-24	6100	5.4%	Lower proportion than the South East and England (at 6.1 and 6.8% respectively)
25-29	8000	7%	Higher proportion than the South East and England at 6 and 6.5% respectively)
30-34	8900	7.8%	Higher proportion than the South East and England (at 6.2 and 6.4% respectively)
35-39	9800	8.6%	Higher proportion than the South East and England & Wales (at 7.4 and 7.5% respectively)
40-44	10100	8.9%	Higher proportion than the South East and England (at 8 and 7.7% respectively)
45-49	8700	7.7%	Higher proportion than the South East and England (at 7.1 and 6.9% respectively)
50-54	7100	6.3%	Higher proportion than the South East and England (at 6.2 and 6.1% respectively)
55-59	6400	5.6%	Lower proportion than the South East and England (at 6.3 and 6.1% respectively)
60-64	5400	4.8%	Lower proportion than the South East and England & Wales (at 5.9 and 5.7% respectively)
65-69	3800	3.3%	Lower proportion than the South East and England (both at 4.4%)
70-74	3300	2.9%	Lower proportion than the South East and England (both at 3.9%)
75-79	2600	2.3%	Lower proportion than the South East and England (at 3.3 and 3.2% respectively)
80-84	1900	1.7%	Lower proportion than the South East and

			England (at 2.5 and 2.4% respectively)
85-89	1100	1%	Lower proportion than the South East and England (at 1.6 and 1.5% respectively)
90+	600	0.5%	Lower proportion than the South East and England (at 0.8 and 0.7% respectively)

Source: Mid-Year Population Estimate 2007 ONS (Table 9)

Ethnicity

Ethnic Group All Persons, All Ages	Total	Proportion	Commentary
All Ethnic Groups	112,200	100%	N/A
White	102,900	91.7%	Lower proportion than the South East (92.6%) and a higher proportion than for England (88.7%)
White: British	96,300	0.9%	Same proportion as the South East and a higher proportion than for England (0.8%)
White: Irish	1,100	1.0%	Same proportion as the South East and a lower proportion than for England (1.1%)
White: Other White	5,500	4.9%	Higher proportion than the South East and England (at 3.6 & 3.3% respectively)
Mixed	1,700	1.5%	Higher proportion than the South East (1.4%) a lower proportion than for England (1.6%)
Mixed: White and Black Caribbean	400	0.4%	Same proportion as the South East and a lower proportion than for England (0.5%)
Mixed: White and Black African	200	0.2%	Same proportion as the South East and England
Mixed: White and Asian	700	0.6%	Higher proportion than the South East and England (both 0.5%)
Mixed: Other Mixed	400	0.4%	Same proportion as the South East and England
Asian or Asian British	4,500	4.0%	Higher proportion than the South East (3.3%) and a lower proportion than for England (5.5%)
Asian or Asian British: Indian	2,700	2.4%	Higher proportion than the South East (1.6%) and a lower proportion than for England (2.5%)
Asian or Asian British: Pakistani	700	0.6%	Lower proportion than the South East and England (at 0.9 & 1.7% respectively)
Asian or Asian British: Bangladeshi	200	0.2%	Lower proportion than the South East and England (at 0.3 & 0.7% respectively)
Asian or Asian British: Other Asian	900	0.8%	Higher proportion than the South East and England (at 0.5 & 0.6% respectively)
Black or Black British	1,700	1.5%	Higher proportion than the South East (1.4%) and a lower proportion than for England (2.8%)
Black or Black British: Caribbean	600	0.5%	Same proportion than the South East and a lower proportion than for England (1.2%)
Black or Black British: African	1,000	0.9%	Higher proportion than the South East (0.8%) and a lower proportion than for

			England (1.4%)
Black or Black British: Other Black	100	0.1%	Same proportion as the South East and a lower proportion than for England (0.2%)
Chinese or Other Ethnic Group	1,300	1.2%	Lower proportion than the South East and England (at 1.3 & 1.4% respectively)
Chinese or Other Ethnic Group: Chinese	600	0.5%	Lower proportion than the South East and England (both 0.7%)
Chinese or Other Ethnic Group: Other Ethnic Group	700	0.6%	Same proportion as the South East and a lower proportion than for England (0.7%)

Source: Office for National Statistics (January 2009)

Sexual Orientation

Group	Total	Proportion	Commentary
Gay	N/A	N/A	There are no available statistics. This section will be updated should statistics become available
Lesbian	N/A	N/A	
Transgender	N/A	N/A	

Disability

Disability	Total	Proportion	Commentary
Physical	N/A	N/A	There are no available statistics. This section will be updated should statistics become available
Sensory	N/A	N/A	
Learning Difficulties	N/A	N/A	
Mental Health	N/A	N/A	

Belief

Group	Total	Proportion	Commentary
All People	109,617	100%	
Christian	78,936	72%	Lower proportion than the South East (72.8%) and a higher proportion than for England (71.7%)
Buddhist	306	0.3%	Same proportion as the South East and England
Hindu	1,090	1%	Higher proportion than the South East (0.6%) and a lower proportion than for England (1.1%)
Jewish	185	0.2%	Same proportion as the South East and a lower proportion than for England (0.5%)
Muslim	741	0.7%	Lower proportion than the South East (72.8%) and a higher proportion than for England (71.7%)
Sikh	213	0.19%	Lower proportion than the South East and England (1.4 and 3.1% respectively)
Other religions	319	0.3%	Lower proportion than the South East and England (0.47 & 0.67% respectively)
No religion	19,687	18%	Higher proportion than for the South East and England (16.5 & 14.6% respectively)
Religion not stated	8,140	7.4%	Lower proportion than for the South East and England (7.5 & 7.7% respectively)

Source: Census 2001 Table KS07 Crown Copyright 2003