

Cambridge City Council and South Cambridgeshire District Council Equality Impact Assessment (EqIA)

Introduction – Please read

The Public Sector Equality Duty, introduced under the Equality Act 2010, requires all public bodies, including local authorities, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation
- Advance equality of opportunity between those who share a protected characteristic and those who do not
- Foster good relations between those who share a relevant protected characteristic and those who do not

Equality Impact Assessments (EqIAs) allow the councils to:

- Show that we are meeting this legal duty by demonstrating due regard for the provisions of the Public Sector Equality Duty
- Identify possible negative impacts on individuals and groups with protected characteristics, plan mitigating action and seek to maximise opportunities to advance equality within our activities.

EqIAs provide a methodical approach to the assessment of impacts across the [nine protected characteristics](#) and should be completed during the development and review of all council policies, strategies, procedures, projects or functions. Where there is any doubt, the completion of an EqIA is always recommended.

Throughout the course of this form, please hover over the [] symbol for guidance in relation to specific questions. If you require any further information please contact equality.schemes@scambs.gov.uk and/or equalities@cambridge.gov.uk .

Equality Impact Assessment Complete Form

Section 1: Identifying Details

- 1.1 Officer completing EqIA: Jonathan Dixon, Planning Policy Manager / Alison Talkington Senior Planning Policy Officer.
- 1.2 Team and Service: Greater Cambridge Shared Planning Policy Team / Planning and Economic Development
- 1.3 Title of proposal: Statement of Community Involvement (SCI)
- 1.4 EqIA completion date: 02/12/20
- 1.5 Proposal implementation date: December 2020
- 1.6 Who will be responsible for implementing this proposal: Greater Cambridge Shared Planning Service

Section 2: Proposal to be assessed

- 2.1 Type of proposal (Strategy, Policy, Procedure, Project, Service, Function, Other): Policy relating to Development Management
Other – part of Neighbourhood Plan.

- 2.2 Is the proposal (New, Review, Change to established)?

Reviewing Statement of Community Involvement (SCI) previously adopted July 2019 (Addendum to SCI agreed in May 2020 to consider impact of COVID-19 pandemic – Further review of Addendum to SCI in December 2020 to update procedures during the pandemic.)

2.3 State the date of any previous equality impact assessment completed in relation to this proposal (if applicable):

V1 - 14/06/2019

V2 - 01/05/2020

2.4 What are the headline aims of the proposal and the objectives that will help to accomplish these aims? (Approximately 250 words)

There is a legal requirement on Local Planning Authorities (LPAs) to undertake public consultation on local plans, neighbourhood plans and planning applications. This SCI is an important document as it will establish a minimum standard of consultation and publicity on planning matters for both Cambridge City and South Cambridgeshire District Councils. It is important that this is undertaken in a cost-effective, efficient, and proportionate manner.

The SCI describes how the public, businesses and interest groups within the local authority areas can get involved in the creation of local planning policy and the planning application process which shapes where we live, work and trade. This is essential to help improve understanding and openness of the planning process.

The councils are committed to treating everyone fairly and justly and want to ensure that everyone gets an opportunity to be involved in the planning process. We recognise that consultation and engagement activities are constantly evolving, and this SCI will be revisited at regular intervals to ensure it is fully up-to date and reflects local and national priorities, practices, and policies.

Update May 2020:

The Councils are committed to keeping essential services running during the COVID-19 outbreak. Planning has an important role to play in supporting our economy and our communities. It is important that we find a way to keep the

planning process moving forward. There are a number of ways in which the councils are having to adapt the approach to planning applications and plan making while movement restrictions are in place.

An Addendum to the SCI has been prepared, to set out which elements are impacted by current restrictions, and how the councils will continue to enable full involvement of people in planning matters. Updating the SCI reflects advice from the Planning Advisory Service. Each of the changes proposed is explained in the Addendum.

This EqIA considers how equality implications apply differently or impacts might be exacerbated during the period of amended practice.

Update December 2020:

Due to the continued restrictions imposed by the COVID-19 outbreak the councils are updating the Addendum prepared in May. The councils are not able to open their offices to the general public and therefore are having to consider how the community can have access to hard copies of planning documents rather than having to rely on on-line version of policy documents. We will be publicising during consultations on neighbourhood plans the contact details both telephone number and email address of the Planning Policy Team to help members of the community to get access to planning documents.

The SCI has been split into three sections which cover the following roles and responsibilities of the planning service:

- Planning Policy including the production of planning policy documents including the Local Plan
- Development Management including how the councils consider and publicise planning applications, and
- Neighbourhood Planning setting out how the councils will assist groups who are preparing neighbourhood plans

The SCI was originally adopted in July 2019 and an Addendum agreed in May 2020 to account for COVID-19 impacts. A further update due to the pandemic was carried out in December 2020.

2.5 Which of South Cambridgeshire District Council's (SCDC) business plan priorities does this proposal link to?

- Helping Businesses to grow - ✓
- Building homes that are truly affordable to live in - ✓
- Being green to our core - ✓
- A modern and caring council - ✓

2.6 Which of [Cambridge City Council's corporate Plan 2019 to 2022](#) priorities does this proposal link to?

- Planning for growth and ensuring our new communities are successful
- Developing effective partnerships and an innovative and dynamic organisation

2.7 Which of South Cambridgeshire District Council's (draft) equality objectives (as detailed in SCDC's Equality Scheme) does this proposal link to or help to achieve?

- Identify, prioritise and deliver actions that will narrow the gap in outcomes between disadvantaged groups and the wider community- ✓
- SCDC is an employer that values difference and recognises the strength that a diverse workforce brings - ✓
- Protected characteristic groups have a voice and are represented in forming the future shape of the district - ✓

2.8 Which of Cambridge City Council's (CCC) equality objectives (as detailed in CCC's Equality Scheme) does this proposal link to or help to achieve?

- To further increase our understanding of the needs of Cambridge's growing and increasingly diverse communities so that we can target our services effectively - ✓

- To continue to work to improve access to and take-up of council services from all residents and communities - ✓
- To work towards a situation where all residents have equal access to public activities and spaces in Cambridge and are able to participate fully in the community - ✓

2.9 Which groups or individuals will the proposal affect:

- Service Users ✓
- External Stakeholders ✓
- Employees ✓
- Councillors ✓
- Other ✓

If other, please specify –

To varying degrees:

Cambridge City Council (joint plan-making partner)

- Planning Services
- Community Services
- Housing
- Environmental Section
- Property Services
- Other service departments as relevant and required

South Cambridgeshire District Council (joint plan-making partner)

- Planning
- Environmental Health
- Housing
- Procurement
- Other service departments as relevant and required

Cambridgeshire County Council (key stakeholder assisting with plan-making)

- Planning including Minerals and Waste team
- Transportation
- Education
- Other service departments as relevant and required

- 2.10** How will these groups or individuals be affected? (you will be asked to provide more detail on the specific impacts on different protected characteristic groups later on in the form) (approximately 250 words)

The SCI describes how the public, businesses, interest groups and individuals within the local authority areas can get involved in the creation of local planning policy and the planning application process aiming at shaping where we live, work and trade.

- 2.11** How many people will this proposal affect? (Approximately)

All South Cambridgeshire and Cambridge City residents and businesses.

- 2.12** If any part of the proposal is being undertaken by external partners, please specify how SCDC will ensure that they will meet equality standards? (Approximately 250 words)

N/A

Section 3: Evidence and Data

- 3.1** Describe any research (this could include consultation) and analysis you have undertaken to understand how [protected characteristic groups](#) are likely to be affected? Please list any key sources that you used to obtain this Information. 
(Approximately 250 words)

The SCI is concerned with the processes for enabling everyone to get involved in the planning process. The SCI was published for public consultation and the representations received have been considered in finalising the document.

South Cambridgeshire District

The council's [Equalities Scheme](#) shows South Cambridgeshire is a rural area with a population which is expected to grow at faster than the national average. A growing elderly population, greater mobility, immigration, and other social trends are making changes to the population. These changes will accelerate as a result of the population growth facing the district in the next ten years or so, leading to a far more diverse society than previously. The following is a snapshot of the people of South Cambridgeshire:

- At present approximately 19% of the South Cambs population falls within the 65+ age group and this is expected to grow to approx. 22% in 2031.
- In 2011 approx. 14% declared a disability whereby day-to-day activities are limited a little or a lot.
- The 2011 Census data shows that in South Cambridgeshire 87.3% of the population were White British (which has fallen in the last ten years from 93.2%) and 6% declared themselves as White Irish, White Gypsy/Irish Traveller and White Other.

Cambridge City

Cambridge City is an urban area which is experiencing growth. The City Council has an [Equality Scheme](#). The following is a snapshot of the people in Cambridge City:

- The number of households increased by 9.5% between 2001 and 2011.
- There is a bulge in the number of people in the 16 to 24 and 25 to 39 age groups. This reflects the large number of students resident in the city.
- Overall the population of Cambridge had aged slightly. The increase in the number of older people as a proportion of the population wasn't as high as in other areas.
- 11% of Cambridge's population are Asian/Asian British compared to 4.1% in the County. 34 % are from minority ethnic groups compared to 15.5% in the County. 1.7% are Black/African/Caribbean/Black British compared to 1% at the County. 3.2% are from Mixed /multiple ethnic group compared

to 1.8% at the County. 1.6% are from other ethnic groups compared to 0.6% for the County. 82.5% are White compared to 92.6% for the County.

The SCI is expected to have impacts on several protected characteristics; including age, disability, religion and rurality (see section 4 below).

The [Authority Monitoring Report](#) for the Greater Cambridge area will include data on any consultations that have been undertaken during the relevant monitoring period, and will use the following indicators:

- Number of people participating in consultation
- Number of people using the councils' online website to make representations

The Authority Monitoring Report will include data on any consultations that have been undertaken during the relevant monitoring period.

3.2 Describe any research (this could include consultation) and analysis you have undertaken to understand any effects on any other groups of people not mentioned in the nine [protected characteristic groups](#) (for example people who live in rural areas, who live in areas of high growth, or from low income backgrounds). 

(Approximately 250 words)

The population of the Greater Cambridge area is expected to grow at a faster rate than the national average.

External Stakeholders:

Whilst there is no mandatory requirement for consultation on a draft SCI, the South Cambridgeshire District Council's Cabinet and the Cambridge City Planning and Transport Scrutiny Committee, in January 2019, agreed that the draft SCI should be published to seek the views of the wider community on the draft document. The public consultation period commenced on Monday 11 February and concluded on Monday 25 March 2019. The consultation period was carried out in accordance with the requirements for Supplementary

Planning Documents (see Table 2 of the adopted SCI). There were a total of 12 representations received during the consultation period and they have been considered when preparing the SCI. The representations are considered in further detail in the Consultation Statement. In summary, a single amendment was proposed to the SCI on the basis of the representations received, which was to include direct links to the webpages for viewing or commenting on planning applications for both councils.

Staff:

The preparation of the Statement of Community Involvement has been a cross departmental process and has involved meetings and regular input from officers in Planning Policy, Development Management (including enforcement) and Planning Business Support. The document has also been informed by Cambridge City Council's Equality and Anti-Poverty Officer.

Update May 2020 and December 2020: Consultation on the SCI update and this EQIA was undertaken with Cambridge City Council's Equality and Anti-Poverty Officer, and the Policy and Performance Team at South Cambridgeshire District Council.

Please note that an EqIA for all virtual meetings (not just Planning) will be undertaken in due course.

- 3.3** If you have not undertaken any consultation, please detail why not, or when consultation is planned to take place. 
(Approximately 250 words)

N/A

Section 4: Impact of proposal on those with protected characteristics

4.1 Age:

4.1.1 Has your research identified that the proposal will have an impact on this protected characteristic?

Yes.

4.1.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.

It is anecdotally recognised that younger age groups are less likely to engage in consultation, and where possible and appropriate relevant organisations and individuals will be identified to reach as wide an age range as possible.

This could include services such as Centre 33, The Kite Trust and ChYPPS (Children and Young People's Participation Service, Cambridge City Council). Evidence suggests that some older people and those from lower income households are also less likely to have access to the internet. Cambridge City Council's [Anti-Poverty Strategy](#) which supports people who are excluded from using the internet gain access and skills they need to use it.

Update May 2020: The increased reliance on technology for community involvement practices could have a negative impact on those most likely to be digitally excluded. This includes older people. Since 2011, adults over the age of 65 years have consistently made up the largest proportion of the adult

internet non-users, and over half of all adult internet non-users were over the age of 75 years in 2018 (latest ONS stats available). Therefore, older people may be less able to participate.

Cambridge City Council's Digital Inclusion Officer (in post-up to September 2020) has been working hard to increase capacity of local voluntary and community sector organisations that support disabled people and older people to get online.

Cambridge City Council works with the [Cambridgeshire Digital Partnership](#) – a network of four voluntary and community sector organisations that help digitally excluded people to get on line and also in context of challenges about digital exclusion exacerbated by COVID-19.

The Digital Partnership has been set up during coronavirus with the aim to get internet enabled devices and data allowances to those who have been identified as most digitally excluded. Members of the Partnership are also providing telephone support and guidance during COVID-19.

Moreover, although we are not able to deposit documents in council buildings which are shut during this time, we are providing contacts to email and phone so people can find out more information on issues they are concerned with, and get help accessing material if they need it. These will be included on our webpages and notices. If people have accessibility needs, they can still request documents in different formats if required (e.g. large print), as made clear on our websites – for [South Cambridgeshire](#) and for [Cambridge City](#)

Update December 2020: As the impact of the Coronavirus pandemic has continued into the autumn it is considered appropriate to agree a further update to the Addendum to the SCI to show how we have adapted our processes during lockdown to involve the local community in planning matters.

The update sets out how the public is involved at the planning application stage:

- Site notices are being displayed
- Measures are in place to allow officers to make site visits relating to planning applications and to planning enforcement
- Copies of documents are available to view on our website
- Planning Committees are being held virtually

The councils are not able to open their offices to the general public and therefore are having to consider how the community can have access to hard copies of planning documents rather than having to rely on on-line version of policy documents. We will be publicising during consultations on neighbourhood plans the contact details both telephone number and email address of the Planning Policy Team to help members of the community to get access to planning documents. This publicity will be included on our website and on posters to be placed around the relevant neighbourhood area. Also emails and letters will be sent to notify stakeholders and the wider community which will include the contact details so that all will know how to have the opportunity to have access to planning documents.

4.2 Disability:

4.2.1 Has your research identified that the proposal will have an impact on this protected characteristic?

Yes.

4.2.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

Some disabled people may struggle to access technology that is adapted to meet their needs - national statistics indicate that many disabled people are especially likely to be digitally excluded. Statistics from 2017, indicate that 56% of adult internet non-users were disabled, much higher than the

proportion of disabled adults in the UK population in 2016 to 2017 that was estimated to be at 22%.

The SCI identifies a range of external groups and organisations that may be consulted on planning matters such as Disability Cambridgeshire, whilst the Greater Cambridge Shared Planning service has a Disability Panel operating within Cambridge City helping to feedback on impacts new developments have on people with a range of disabilities.

The consultation document can be made available on request in large copy print, audio cassette or braille and officers are willing to meet individuals and talk issues through. This approach would also apply, as necessary, to subsequent consultation documents that are prepared in the plan making process. In respect of planning applications, information can be made available in a range of formats if required.

Update May 2020: Cambridge City Council's Digital Inclusion Officer (up to September 2020 when the post ended) was working to increase capacity of local voluntary and community sector organisations that support disabled people and older people to get online. For instance, working with Cambridge Online and others to aim to get internet enabled devices and data allowances to disabled people those who have been identified as most digitally excluded.

Cambridge City Council works with the [Cambridgeshire Digital Partnership](#) – a network of four voluntary and community sector organisations that help digitally excluded people to get on line and also in context of challenges about digital exclusion exacerbated by COVID-19.

Moreover, although we are not able to deposit documents in council buildings which are shut during this time, we are providing contacts to email and phone so people can find out more information on issues they are concerned with, and get help accessing material if they need it. These will be on our webpages and notices. If people have accessibility needs, they can still request

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4.3 Gender Reassignment:

4.3.1 Has your research identified that the proposal will have an impact on this protected characteristic?

No.

4.3.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

N/A

4.4 Marriage and Civil Partnership:

4.4.1 Has your research identified that the proposal will have an impact on this protected characteristic?

No.

4.4.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

N/A

4.5 Pregnancy and Maternity:

4.5.1 Has your research identified that the proposal will have an impact on this protected characteristic?

Yes.

4.5.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative

- whether it is a high, medium or low impact. 
- approximately 250 words per impact

The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.

Where people are required to care for children, it may be difficult for them to engage in consultation events and meetings. A number of the planning policy consultation events take place within and outside of usual working hours to try and ensure residents and businesses are able to engage in the process. Planning applications are available for public inspection online and can be accessed at any time of the day.

4.6 Race:

4.6.1 Has your research identified that the proposal will have an impact on this protected characteristic?

No.

4.6.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

N/A

4.7 Religion or Belief:

4.7.1 Has your research identified that the proposal will have an impact on this protected characteristic?

No.

4.7.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

N/A

4.8 Sex:

4.8.1 Has your research identified that the proposal will have an impact on this protected characteristic?

No.

4.8.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

N/A

4.9 Sexual Orientation:

4.9.1 Has your research identified that the proposal will have an impact on this protected characteristic?

No.

4.9.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

N/A

4.10 Other: (e.g. rurality, growth, socio-economic status etc.).

4.10.1 Has your research identified that the proposal will have an impact on this protected characteristic?

Yes.

4.10.2 Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.

It can be difficult to contact some low income groups if they have limited access to the internet and transport, and the SCI sets out that where additional mechanisms are required to improve levels of engagement on planning matters that bespoke methods may be used. This will be considered in detail taking into account the subject matters and geographic scope of each new stage of plan making, and in respect of planning applications.

Evidence suggests that some people with lower levels of educational attainment are also less likely to have access to the internet, which the Cambridgeshire Digital Partnership and Cambridge City Council's Anti-Poverty Strategy is aiming to address.

Rural access to high speed internet is also an issue within the district and part of the council's Business Plan is to work with partners to improve broadband and mobile phone coverage across the district. To assist with viewing planning documents online, the councils' will generally split large documents,

such as a Design and Access Statement, when they exceed 50 pages or 10MB in file size to assist users with downloading and viewing large files.

Update May 2020: People might not have access to devices or good broadband due to being on low incomes. Before the COVID-19 crisis and beyond this, Cambridge City Councils' Housing Service has been working hard to provide people in our council homes access to reliable and cheap broadband. Many people on low incomes might not have access to computers but are more likely to have access to smart phones. Most also have limited data allowances, or use pay as you go. Cambridge City Council's and South Cambridgeshire District Council's websites meet the EU Web Accessibility Directive requirements, which also requires that our websites be compatible for use on smartphones.

Moreover, although we are not able to deposit documents in Council buildings which are shut during this time, we are providing contacts to email and phone so people can find out more information on issues they are concerned with, and get help accessing material if they need it. These will be on our webpages and notices. If people have accessibility needs they can still request documents in different formats if required (e.g. large print), as made clear in our website [accessibility statement](#).

Update December 2020: As the impact of the Coronavirus pandemic has continued into the autumn it is considered appropriate to agree a further update to the Addendum to the SCI to show how we have adapted our processes during lockdown to involve the local community in planning matters.

The update sets out how the public is involved at the planning application stage:

- Site notices are being displayed
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- Copies of documents are available to view on our website

- Planning Committees are being held virtually

The councils are not able to open their offices to the general public and therefore are having to consider how the community can have access to hard copies of planning documents rather than having to rely on on-line version of policy documents. We will be publicising during consultations on neighbourhood plans the contact details both telephone number and email address of the Planning Policy Team to help members of the community to get access to planning documents.

Section 5: Summary

- 5.1** Briefly summarise the key findings of the EqIA and any significant equality considerations that should be taken into account when deciding whether or not to proceed with the proposal (this section can be included within the 'equality implications' section of any committee reports). (Approximately 250 words)

The SCI has sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City. However, this EqIA identifies that certain age groups are less likely to engage in consultations, people with different disabilities have accessibility needs while lower income, and some rural, households are less likely to have access to the internet causing increased digital exclusion. Measures have and continue to be put in place to mitigate this for example Cambridge City Council works with the Cambridgeshire Digital Partnership. While those with accessibility needs can make requests for specific support such as large copy print, and Cambridge City Council operates a Disability Panel identifying the impacts new developments can have on a range of disabilities.

The **May 2020** addendum provides an update on the work that Councils has been doing to support disabled and older people get online in a time where we have seen an increased reliance on technology. Officers have supported initiatives such as Devices Dot Now which helps to get internet enabled devices and data allowances to those identified as digitally excluded. It has

also made email and phone details available so that people can find information on issues of concern and receive help in accessing materials, even whilst Council buildings are closed due to COVID-19.

The **December 2020** updates provides information on how the public will be able to have access to neighbourhood plan documents out for consultation by the councils publicising contact details both telephone number and email address for the community to ask the Planning Policy Team for assistance. It also highlights that Planning Committee is taking place virtually – access to the internet would be required for this.

Cambridge City Council works with [Cambridgeshire Digital Partnership](#) – a network of four voluntary and community sector organisations that help digitally excluded people to get on line and also in context of challenges about digital exclusion exacerbated by COVID-19.

The councils will continue to monitor the success of their consultations.

- 5.2** Confirm the recommendation of the officer completing the EqIA (delete as appropriate):

Approved (No major change): Your analysis demonstrates that the policy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.

- 5.3** Signature of individual completing EqIA: Kate Yerbury (South Cambridgeshire District Council) and Helen Crowther (Cambridge City Council)

- 5.4** Date of completion: 02/12/20

Section 6: Sign Off

- 6.1** Approving officer EqIA review outcome: (delete as appropriate):

Approved (No major change): Your analysis demonstrates that the policy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.

6.2 Do you give permission to publish this EqIA on SCDC website? If no, please state reason.

Yes.

6.3 When will this proposal next be reviewed and who will this be?

Planning Policy Team

Subject to the findings of ongoing monitoring, it will be reviewed next time the SCI is updated. Councils are required to review their SCI at least every 5 years.

6.4 Approving officer signature: J Dixon / A Talkington

6.5 Date of approval: 02/12/20

Please send a copy to

- Equality.Schemes@scambs.gov.uk
- equalities@cambridge.gov.uk