

Draft Canterbury District Local Plan 2040
Regulation 18 Consultation 2024

**EQUALITY IMPACT
ASSESSMENT FOR
DRAFT LOCAL PLAN**
(FEBRUARY 2024)

Equality Impact Assessment

Please be aware that in order to comply with the Public Sector Equality Duty 2010, this document will be made available to the public.

You should treat this as a live document and keep it under continuous review. You should do this by recording any issues you identify, along with any actions you take to minimise their impact.

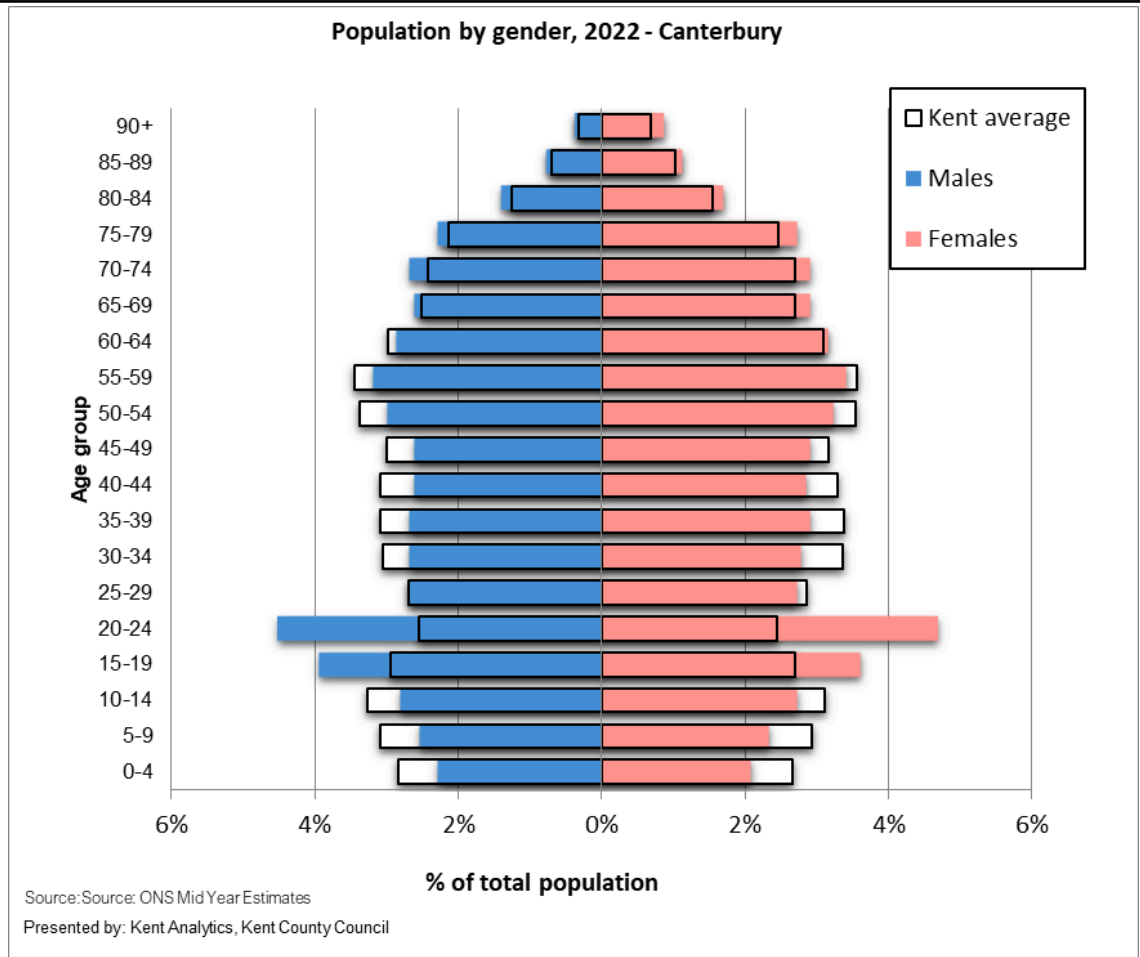
Please refer to the Equality Impact Assessment guidance on iCan to help you in completing this form.

For the purposes of this form, we refer to your policy, function, project or service as a proposal.

Date of initial assessment	29/01/2024
Division	Policy and Communications
Proposal to be assessed	Draft Canterbury District Local Plan (2040) (Regulation 18)
New or existing policy or function?	New
External (i.e. public-facing) or internal?	External
Statutory or non-statutory?	Statutory
Your name	Victoria Asimaki
Your job title	Principal Policy Officer (Engagement)
Your contact telephone number	N/A
Decision maker (e.g. Full Council, Community Committee, Management Team etc.)	Cabinet
Estimated proposal deadline	Monday 3 June 2024 (final consultation date)

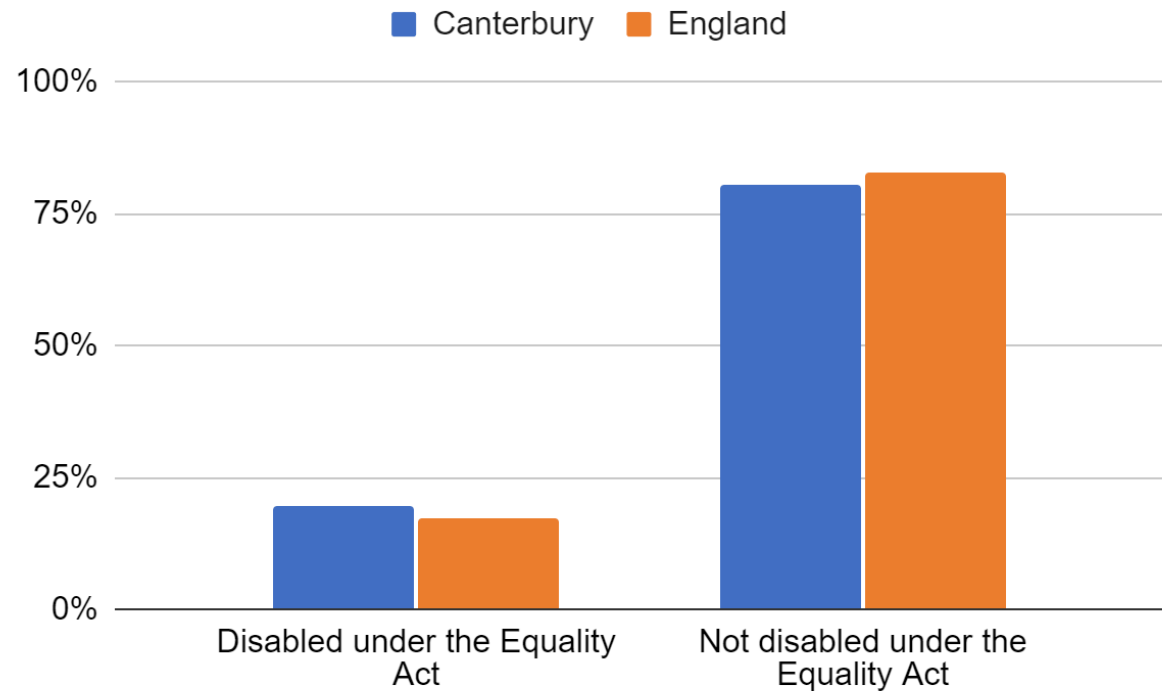
Please outline your proposal, including: <ul style="list-style-type: none"> ● Aims and objectives ● Key actions ● Expected outcomes 	<p>The consultation enables local people, communities and other stakeholders to give us their views on the Local Plan.</p> <p>The Local Plan will direct how the district will change over the next 20 years.</p>
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<ul style="list-style-type: none"> • Who will be affected and how • How many people will be affected 	<p>The consultations ensure that everyone has an equal opportunity to share their views.</p> <p>There are 157,600 people in the Canterbury district and a large proportion of them could be affected by the plan as well as others visiting the district for work or tourism.</p>
<p>What relevant data or information is currently available about the customers who may use this service or could be affected?</p> <p>Please give details; for example “x% of customers are female” or “x% of customers are aged over 60”</p>	<p>This section contains images based on the data in Appendix 1.</p> <p>Age</p> <p>The district has a higher proportion of 19 to 24 year olds and 70 to 79 year olds than the Kent average.</p> <p>Source: 2022 Mid-year population estimates, Office for National Statistics (ONS)</p>



Disability

Levels of disability under the Equality Act in the district and England as a whole are similar.



Source: Table TS038, 2021 Census, The Office for National Statistics (ONS)

Gender reassignment

As a percentage of people in the district answering the 2021 Census,

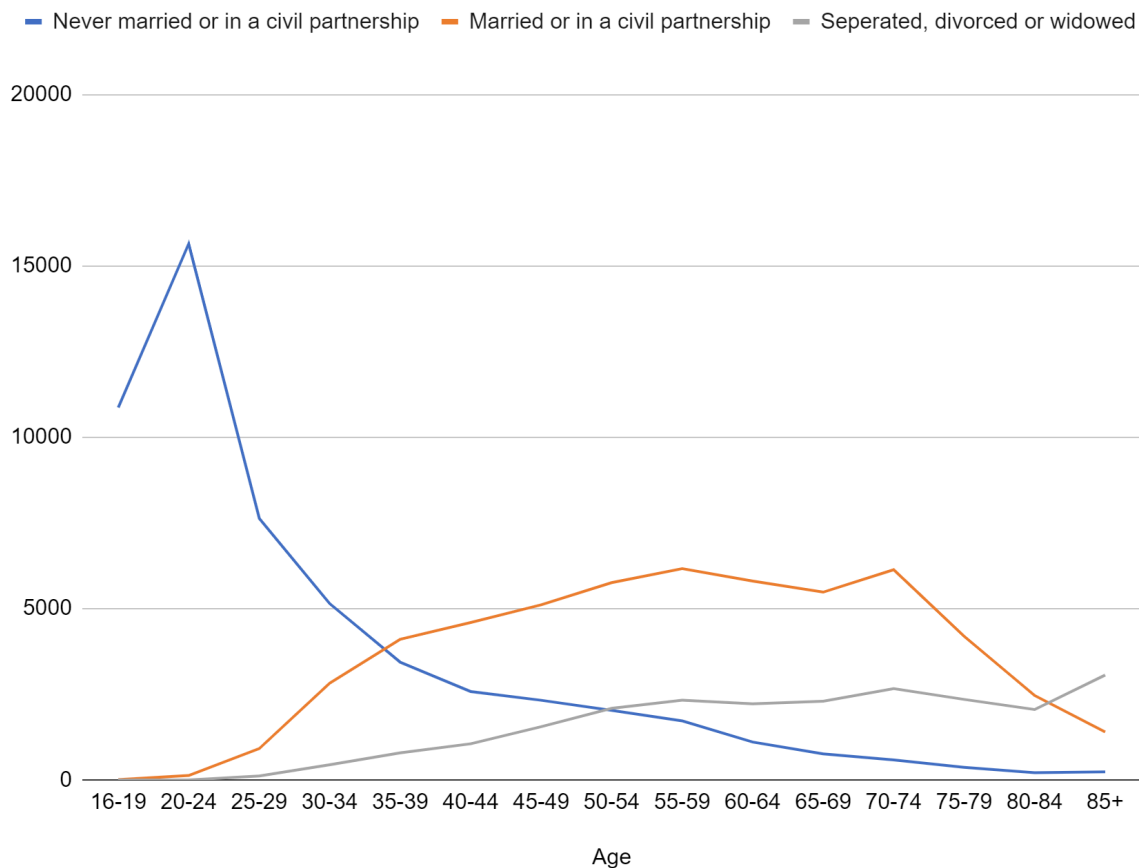
- 93% of people in the district have a gender identity the same as sex registered at birth
- 6% of people answering the census did not answer this question.
- 0.2% were all other gender identities
- 0.1% were trans women
- 0.1% were trans men

Source: Table TS078, 2021 Census, The Office for National Statistics (ONS)

Marriage and civil partnership

- 41% of people in the district have never been married or in a civil partnership.
- 41% of people in the district are married or in a civil partnership.
- 17% of people in the district are separated, divorced or widowed.

Source: Table TS002, 2021 Census, The Office for National Statistics

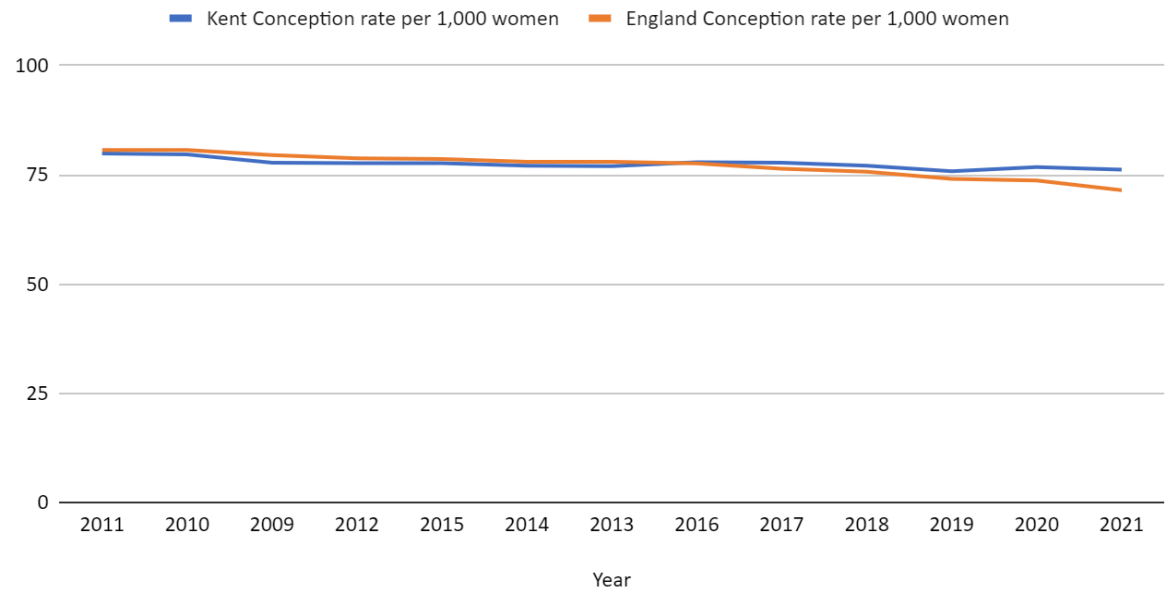


Source: Table TS002, 2021 Census, The Office for National Statistics, Canterbury District only

Pregnancy and maternity

Levels of conception in Kent and England are similar at about 75 people per 1000 women.

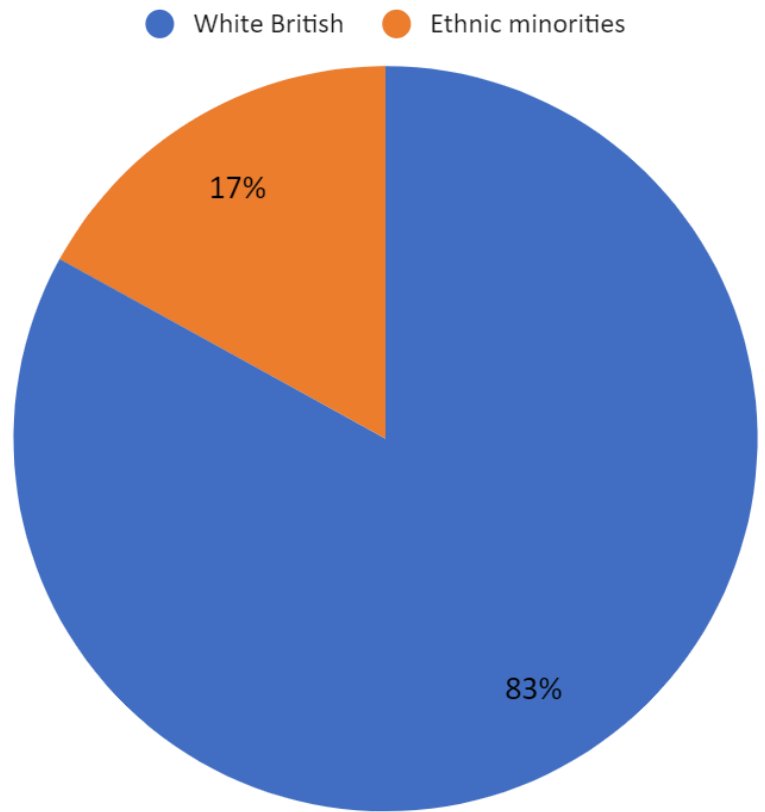
Kent Conception rate per 1,000 women and England Conception rate per 1,000 women



Race

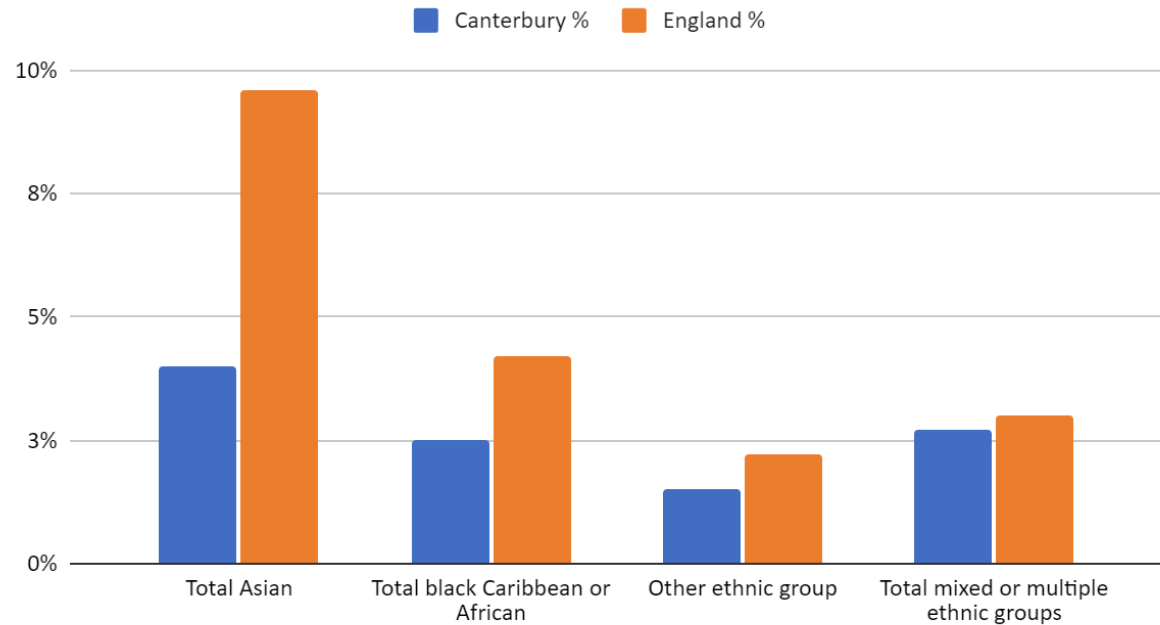
83% of people identify as white British
17% identify as something other than white British

Full statistics in Appendix 1



Source: 2021 Census, Table RM032, Canterbury District data only.

Minority ethnic group as percentage of Canterbury and England %

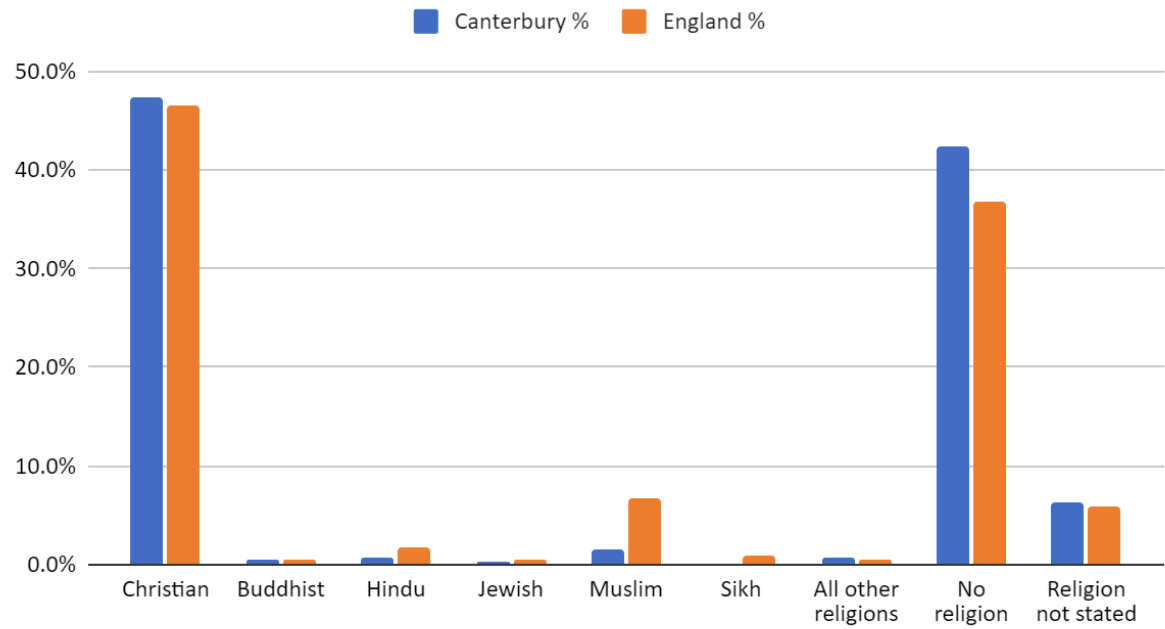


Source: 2021 Census, Table RM032,

Religion or belief

- 47% of people in the district gave their religion as Christian.
- 42% of people in the district have no religion.
- As a percentage, there are slightly more people with no religion in the district compared with England.
- As a percentage, there are fewer muslims in the district compared with England.

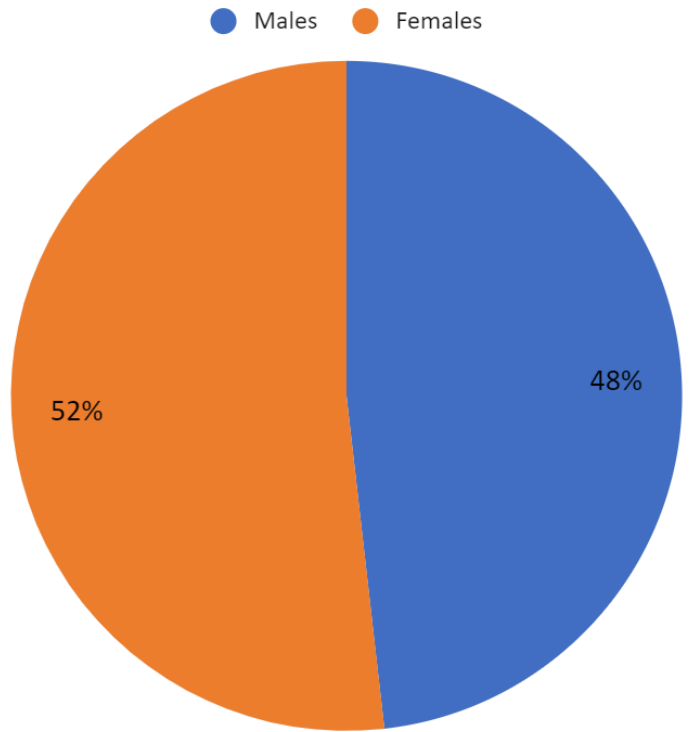
Religion as Percentage of Population for England and Canterbury



Source: 2011 Census - Table TS030

Sex

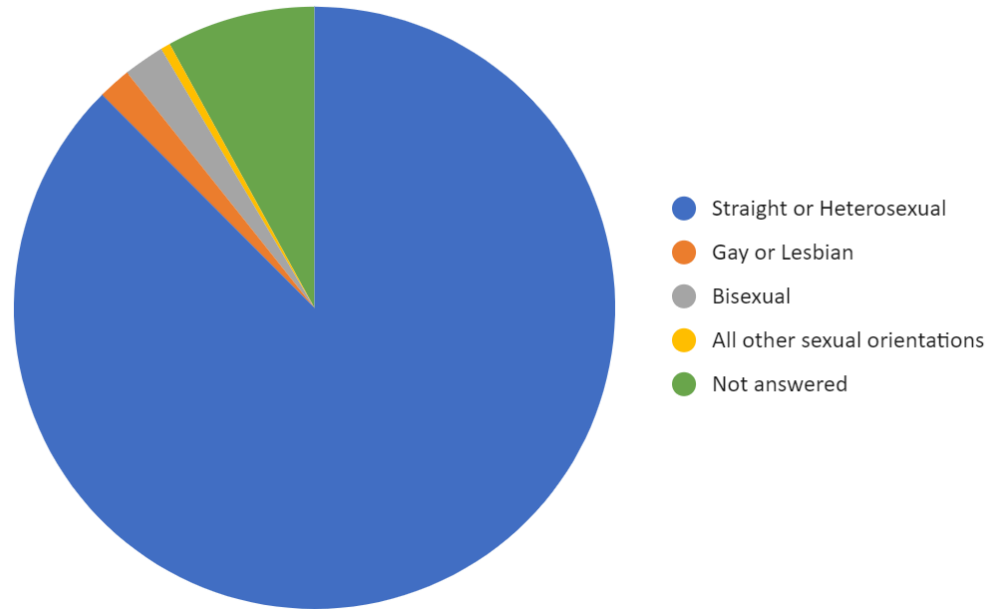
- 52% percent of people in the district are female.
- 48% percent of people in the district are male.



Source: 2022 Mid-year population estimates, Office for National Statistics

Sexual orientation

Canterbury Population Sexual Orientation



Source: Office for National Statistics, Census 2021

Is the decision relevant to the aims of the Public Sector Equality Duty, which are listed below?

Guidance on the aims can be found in the EHRC's [PSED Technical Guidance](#)

Aim	Yes/No	Explanation
Eliminate discrimination, harassment and victimisation	Yes	The draft Local Plan includes policies to ensure safe living and working environments.

		<p>It has followed some of the principles set out in the Kent Police's 'Designing Out Crime' briefing which recognised that a good planning process can reduce the opportunity for crime and the fear of crime.</p> <p>The Plan also ensures that accessible spaces are provided across the district, in both residential and commercial spheres to promote inclusivity.</p>
Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes	The draft Local Plan includes policies to specifically benefit people with protected characteristics, including older people, younger people and those with disabilities.
Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	Yes	The draft Local Plan seeks to ensure the creation of sustainable communities and safe and accessible residential and commercial spaces designed to encourage healthy, inclusive and safe places which promote social interaction.

Assess the relevance of the proposal to people with different protected characteristics, and assess the impact of the proposal on people with different protected characteristics.

Your explanation should make it clear who the assessment applies to within each protected characteristic. For example, a proposal may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Protected characteristic	Relevance to proposal High/Medium/Low/None	Impact of proposal Positive/Neutral/Negative	Explanation
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<p>Age</p>	<p>Medium</p>	<p>Positive</p>	<p>Policies that support housing supply (SS3) or the affordability of homes (DS1) are more likely to benefit younger people, as they are less likely to already be homeowners.</p> <p>Policy DS24 supports play areas that are challenging and fun for children. It makes provisions for 0 to 5 year olds, 5 to 12 year olds and 12 to 18 year olds. This benefits younger people.</p> <p>Policy DS5 support for specialist older persons housing. This benefits older people.</p> <p>Policy DS16 controls the impact of new developments on air quality which may particularly benefit older and younger people who can be more sensitive than the average population to air pollution. Similarly, Policy DS6 states that proposals should include provision for electric vehicle charging, which encourages the use of electric vehicles and reduces local air pollution.</p> <p>Policy DS5 support for purpose-built student accommodation within higher and further education campuses. Students are younger as a group on average, so this benefits younger people.</p> <p>As people age they can become less able to drive and can find travelling long distances harder. 17 to 20 year olds are much less likely to have a driving licence than those who are 21 years or more old,</p>
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			<p>and those below 17 can't drive. Policies that improve public transport and ensure shops are close to homes, can therefore particularly benefit yonder and older people.</p> <p>DS10 requires some proposals to be accessible to the nearest centre through transport modes other than the car. SS2 promotes complete and compact neighbourhood which means people have to travel less far to shops and services.</p> <p>SS4 encourages the improvement of public transport in rural areas. Rural areas have, in general, higher proportions of people older, so this policy can benefit this group in particular. DS14</p> <p>Older people are more likely to experience mobility difficulties. Policies that require buildings to be designed with good accessibility (DM11 and DM12) can benefit older people.</p> <p>People can require more care as they age, which can sometimes be provided by family members. The creation of annexes, as specified in DM10, can allow older people to live near family members providing care. This can benefit older people.</p> <p>Younger and older people are more susceptible to hot or cold weather. Policies that encourage the construction of warmer, energy efficient homes (DS6) or or the design of cooler settlements through the protection and creation of open (DS24)</p>
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			and green spaces (DS19) therefore help these groups in particular.
Disability	Medium	Positive	<p>People who are unable to drive because of their disability will benefit from policies like SS4 and DS14 which support the improvement of public transport.</p> <p>Policy DM5 states that new parking should meet the needs of people with disabilities.</p> <p>SS4 includes the provision of a new Special Educational Needs and Disabilities School.</p> <p>Policy DS24 requires proposals with a new on site open space to have appropriate play opportunities for users with disabilities (physical and mental) and be accessible by those with disabilities.</p> <p>Local Plan documents should follow accessibility guidelines to ensure they can be used by people with different needs, such as larger text size or screen readers.</p> <p>Policy DS2 ensures that a certain proportion of accessible homes are built for proposals of 10 or more dwellings.</p> <p>Policy DM17 seeks to control the impacts of noise pollution which can be a particular problem for people with sensory processing sensitivity, which can impact many different groups of people, including those with autism.</p>

			Policy DS10 supports proposals for social care facilities.
Gender reassignment	Low	Positive	<p>People who have started, are undergoing or have completed gender reassignment can experience high levels of some types of crime, like harassment, so policies that affect safety can particularly benefit these groups.</p> <p>Policy DM7 requires Crime Impact Assessments can encourage applicants to consider rates of crime in the area of their proposal and include things that can improve street safety like lighting and security cameras. Policy DS6 states that developments should enable opportunities for natural surveillance and appropriate external lighting. Natural surveillance is a concept in crime prevention design that encourages the placement of physical features such as windows, lighting, and landscaping in a way that enhances visibility to reduce crime.</p>
Marriage and civil partnership	None	None	No significant effects were identified. Policy DS26 protects heritage assets, many of which are venues for marriages.
Pregnancy and maternity	Low	Positive	Policy SS2 states that community facilities and services such as healthcare should be built at the heart of new developments of 300 homes or more, within or next to the community hub. Pregnant people may be less mobile than normal and may have additional healthcare needs, so the creation of healthcare services near to housing may benefit them in particular.

Race	Medium	Positive	<p>Gypsy and travellers can face discrimination and marginalisation. Policy DS5 policy sets out the criteria for the development of gypsy and traveller sites, so there is an unambiguous approach for assessing these developments. Policy SS3 sets out the provision of gypsy and traveller accommodation.</p> <p>Average incomes vary by ethnic group, so policies that help low income groups can also benefit some ethnicities more than others. For instance Black, African, Caribbean or Black British employees were the only ethnicity group to be consistently earning less than White employees, according to “Ethnicity pay gaps, UK: 2012 to 2022” by the Office for National Statistics. This means policies that help people with low incomes, like our affordable homes (DS1) policy, may indirectly benefit Black, African, Caribbean or Black British people.</p> <p>.</p>
Religion or belief	Low	Positive	<p>No significant effects were identified. Policy DS26 protects heritage assets which can include older religious buildings. Many but not all Christian places of worship are old buildings and so are often heritage assets. This policy may therefore indirectly benefit Christians who worship in buildings.</p>
Sex	Low	Positive	<p>Our Public Open Spaces (DS24) policy encourages the creation of places such as parks and sports complexes that can provide safe environments for</p>

			<p>leisure and exercise. New facilities and open spaces will be well maintained with active surveillance and lighting. These should provide a secure environment that can empower women to feel safe while pursuing exercise and leisure activities, as encouraged by our Sustainable Design (DS6) policy, and provide comfortable areas for women and girls to meet or to spend time alone. Safe spaces for play and sports for girls from a young age can encourage them to try more sports or activities that are often male dominated.</p> <p>By creating better transport infrastructure, with our Movement and Transportation Strategy (SS4) and our Active and Sustainable Travel (DS14) policy, we can offer more up to date and safe public transport options so that women may have choices of how to travel. This should help lessen fears of harassment on public transport and empower women and girls to feel secure in their freedom of movement.</p>
Sexual orientation	Low	Positive	<p>People with atypical sexual orientations can experience higher levels of some types of crime, like harassment, so policies that affect safety can particularly benefit these groups.</p> <p>Policy DM7 requires Crime Impact Assessments which can encourage the applicants to consider rates of crime in the area of their proposal and to include things that can improve street safety like lighting and security cameras. Policy DS6 states that developments should enable opportunities for</p>

			natural surveillance and appropriate external lighting. Natural surveillance is a concept in crime prevention design that encourages the placement of physical features such as windows, lighting, and landscaping in a way that enhances visibility to reduce crime.
Other groups: for example – low income/ people living in rural areas/ single parents/ carers and the cared for/ past offenders/ long-term unemployed/ housebound/ history of domestic abuse/ people who don't speak English as a first language/ People without computer access etc.	Low	Positive	<p>Our Estate regeneration (DS3) policy seeks to improve poor quality dwellings in existing urban social housing estates. This may benefit people with low incomes.</p> <p>Furthermore, Policy DS6 states that new developments should be operationally net zero, which makes homes cheaper to heat to a comfortable level. This policy also ensures buildings use less water by setting per person limits on the amount of water that a home should ideally use. By ensuring homes are more efficient, we can reduce the size of people's water and heating bills, which is especially important for people with low incomes.</p> <p>Policy DS2 requires proposals to include a mix of housing types that meets the needs of communities. This could include the number of bedrooms/size of housing required by certain groups such as single parents.</p> <p>Policy DS12 takes a positive approach to growing the rural economy which can provide jobs for people with low income in rural areas.</p>

			Policy DS5 supports proposals for residential homes and enhanced sheltered housing which helps some groups of people who are cared for. Policy DS10 supports proposals for social care facilities.
People with limited internet access	None	None	No effects were identified.

Are you going to make any changes to your proposal as a result of these findings, in order to mitigate any potential negative impacts identified? If yes, what are they? If no, why not?	No. The Draft Canterbury District Local Plan (2040) includes a variety of policies which would have positive impacts on equalities should they be implemented. The current draft of the policies has been informed by extensive community and stakeholder engagement, including comments regarding their impacts on equalities. These policies will be subject to further consultation and can be reviewed again to take account of the responses received ahead of the Regulation 19 stage
Is there any potential negative impact which cannot be minimised or removed? If so, can it be justified? (for example, on the grounds of promoting equality of opportunity for another protected characteristic)	No

What additional information would increase your understanding about the potential impact of this proposal?	None identified at present.
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If a consultation exercise is required as part of your proposal, please complete the consultation planning form on iCan.

Please update the section below if:

- You have amended your proposal

- You have new information
- You have undertaken consultation

Date of revised assessment	
Have you made any changes to your initial assessment? If so, please give brief details	
Did you undertake consultation? – if yes, give date and the consultation results:	
Do you have new information which reveals any difference in views across the protected characteristics?	
Can any new conclusions be drawn as to how the proposal will affect people with different protected characteristics?	
Are you going to make any changes to your proposal as a result of these findings, in order to mitigate any potential negative impacts identified? If yes, what are they? If no, why not?	
Is there any potential negative impact which cannot be minimised or removed? If so, can it be justified? (for example, on the grounds of promoting equality of opportunity for another protected characteristic)	

Should you need to revisit your assessment more than once, please ensure that you provide details of any changes or new information and the date these amendments were made.

Appendix 1 - Relevant Data

Age

Age group	Number of people	Percentage of population in the district
0-4	6,900	4.4%
5-9	7,700	4.9%
10-14	8,700	5.5%
15-19	11,900	7.6%
20-24	14,500	9.2%
25-29	8,400	5.3%
30-34	8,600	5.5%
35-39	8,800	5.6%
40-44	8,600	5.5%
45-49	8,700	5.5%
50-54	9,900	6.3%
55-59	10,300	6.6%
60-64	9,500	6.0%
65-69	8,700	5.5%
70-74	8,800	5.6%
75-79	7,900	5.0%
80-84	4,900	3.1%
85-89	3,000	1.9%
90+	2,000	1.2%

Source: 2022 Mid-year population estimates, Office for National Statistics (ONS)

Disability

Measure of disability	Number of people	Percentage of population in the district
Disabled under the Equality Act	30,870	20%
Day-to-day activities limited a lot	12,400	8%
Day-to-day activities limited a little	18,470	12%
Not disabled under the Equality Act	126,561	80%
Has long term physical or mental health condition but day-to-day activities are not limited	12,431	8%
No long term physical or mental health conditions	114,130	72%

Source: Table TS038, 2021 Census

Gender Reassignment

2021 Gender Identity	Number of people in the district	Percentage of population in the district	Percentage of population in England and Wales
Usual residents Aged 16 and over	132,773	100.0%	100.0%
Gender identity the same as sex registered at birth	124,001	93.4%	93.5%
Gender identity different from sex registered at birth but no specific identity given	222	0.2%	0.2%
Trans woman	114	0.1%	0.1%
Trans man	135	0.1%	0.1%
All other gender identities	252	0.2%	0.1%
Not answered	8,049	6.1%	6.0%

Source: Table TS078, 2021 Census, The Office for National Statistics (ONS)

Marriage and civil partnership

Age	Never married or in a civil partnership	Married or in a civil partnership	Seperated, divorced or widowed
16-19	10,865	10	0
20-24	15,645	130	0
25-29	7,630	915	115
30-34	5,145	2,825	445
35-39	3,435	4,105	790
40-44	2,580	4,595	1055
45-49	2,325	5,110	1555
50-54	2,030	5,760	2090
55-59	1,725	6,165	2325
60-64	1,105	5,805	2220
65-69	760	5,480	2295
70-74	585	6,135	2665
75-79	370	4,190	2350

80-84	210	2,465	2055
85+	235	1,400	3060

Source: Table TS002, 2021 Census, The Office for National Statistics (ONS). Data for Canterbury District only.

Pregnancy and Maternity

Year	Kent Conception rate per 1,000 women	England Conception rate per 1,000 women
2021	76	72
2020	77	74
2019	76	74
2018	77	76
2017	78	76
2016	78	78
2015	78	79
2014	77	78
2013	77	78
2012	78	79
2011	80	81
2010	80	81
2009	78	80

Source: Dataset Office for National Statistics, Conceptions in England and Wales

Race

	Canterbury %	England %
Total Asian	4%	10%
Total black Caribbean or African	3%	4%
Total mixed or multiple ethnic groups	3%	3%
Total white	89%	81%
Other ethnic group	2%	2%

Source: 2021 Census, Table RM032

Religion or belief

	Canterbury %	England %
Christian	47.3%	46.5%
Buddhist	0.6%	0.5%

Hindu	0.7%	1.8%
Jewish	0.2%	0.5%
Muslim	1.6%	6.8%
Sikh	0.1%	0.9%
All other religions	0.7%	0.6%
No religion	42.3%	36.7%
Religion not stated	6.4%	5.8%

Source: 2011 Census - Table TS030

Sex

Canterbury	Males %	Females %
All Ages	48%	52%
0-4	52%	49%
5-9	52%	48%
10-14	51%	49%
15-19	52%	48%
20-24	49%	51%
25-29	49%	51%
30-34	49%	52%
35-39	47%	53%
40-44	48%	52%
45-49	47%	53%
50-54	48%	52%
55-59	48%	52%
60-64	48%	53%
65-69	48%	53%
70-74	48%	53%
75-79	45%	55%
80-84	44%	56%
85-89	40%	60%
90+	31%	69%

Source: 2022 Mid-year population estimates, Office for National Statistics (ONS)

Sexual Orientation

Sexual orientation	Canterbury Percent
Straight or Heterosexual	88%

Gay or Lesbian	2%
Bisexual	2%
All other sexual orientations	1%
Not answered	8.00%

Source: Office for National Statistics, Census 2021