

Tunbridge Wells Borough



Tunbridge Wells Borough Council

Equality Impact Assessment

for Submission Version Local Plan

October 2021



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1.0 Introduction and Background

- 1.1 This report details the results of the Equality Impact Assessment (EqIA) of the Tunbridge Wells Borough new Local Plan (the new Local Plan). The main purpose of the EqIA is to assess whether the new Local Plan affects different groups of people in different ways. It considers the likely impact on these groups and how the needs of such groups have been taken into account in relation to the development of the new Local Plan and the policies and proposals contained within it.
- 1.2 This EQIA, which comes into effect in October 2021, updates and replaces the previous EQIA dated February 2021 (itself being an update of previous iterations of the EQIA). Due to the progression of the Local Plan, including consideration of representations to the recent Regulation 19 Pre-Submission Local Plan consultation, an updated EQIA is necessary.
- 1.3 Overall, the Borough Council's focus is to complete preparation of, submit, and then duly adopt, a new Local Plan to replace the now dated Local Plans currently in place. There has been substantial progress in the preparation of the new Local Plan, with three public consultations undertaken to date, firstly on 'Issues and Options', secondly, on a Regulation 18 'Draft Local Plan', and more recently a third consultation on a Regulation 19 'Pre-Submission version Local Plan' which took place for ten weeks between the 26th of March and 4th June 2021.
- 1.4 The Council is now preparing a 'Submission' version of the Local Plan, which is proposed to be submitted to the Planning Inspectorate, alongside all duly-made representations, for independent examination. The Submission Local Plan comprises of that which was consulted upon at the Regulation 19 stage incorporating all the additional (minor) modifications that are proposed in response to the representations received to that consultation. The Submission version of the Local Plan is to aid the Inspector in the examination of the Plan.
- 1.5 The new Local Plan details the planning policies proposed by Tunbridge Wells Borough Council for the period 2020-2038. Specifically, it sets out proposals for development and growth and policies to protect and enhance the natural and built environment of Tunbridge Wells borough. It will replace the previous planning documents: the Tunbridge Wells Borough Local Plan 2006; the Core Strategy 2010; and the Site Allocations Local Plan 2016. The new Local Plan contains:
 - a long-term vision for the borough and the strategic objectives and policies that will guide development over the plan period;

- site allocations to deliver the new development to meet the needs of the borough;
 - development management policies to guide and control new development.
- 1.6 The new Local Plan has been developed in consideration of the evidence base, as well as national planning policy and guidance, feedback from public consultations, a Sustainability Appraisal and a Habitats Regulations Assessment which have been undertaken on the Local Plan.
- 1.7 Tunbridge Wells Borough Council is committed to promoting a community and organisational culture that fully respects and values everyone's differences and needs. Equality and diversity are integral to our core business, our staff, and service users.

Legal Context

- 1.8 Local authorities are required to have due regard to the Public Sector Equality Duty at a formative stage in policy formulation. An equality impact assessment can be used to assist with making the necessary considerations and provides evidence of how a local authority has discharged its duty.
- 1.9 Under the Equality Act 2010, the Council must comply with the Public Sector Equality Duty to:
- eliminate unlawful discrimination, harassment, and victimisation;
 - advance equality of opportunity between those who share a protected characteristic and those who do not; and
 - foster good relations between people who share a protected characteristic and those who do not.

The Purpose of the EqIA

- 1.10 The purpose of the EqIA is to assess the potential impact of the policies in the new Local Plan on different groups within Tunbridge Wells borough. An assessment of the new Local Plan policies has been undertaken in relation to the groups with the following protected characteristics (as defined by the Equalities Act 2010):

- **Age:** this refers to a person being a particular age or being within an age group. This includes all ages, including older people, children and young people;
- **Sex:** this is someone being either male or female;
- **Disability:** a person has a disability if she or he has a physical impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities, e.g. physical, sensory, mental, or learning impairment;
- **Race:** this includes colour, nationality (including citizenship), ethnic, or national origins;
- **Religion or belief:** religion means any religion, including a reference to a lack of religion. Belief includes religious and philosophical beliefs, any religious/faith or other groups with a recognised belief system or lack of belief;
- **Sexual orientation:** this is whether a person's sexual attraction is towards their own sex, the opposite sex, or to both sexes;
- **Gender reassignment:** this relates to people who are transitioning from one gender to another;
- **Pregnancy and maternity:** this includes expectant mothers and mothers who have recently had a child. Protection against maternity discrimination is for 26 weeks after giving birth.

1.11 In addition to the protected characteristic groups set out above, it has also been considered appropriate to include 'Income and Deprivation'. This is due to the fact that there are pockets of deprivation within the borough, as identified within the Index of Multiple Deprivation (2015). Given this information, it was considered appropriate to include low-income groups as part of the assessment to determine whether they are unfairly discriminated against in comparison to other communities within Tunbridge Wells borough. Therefore, in this EqIA of the new Local Plan, 'Income and Deprivation' will be assessed together with the protected characteristics defined by the Equality Act 2010.

The Equality Act

1.12 As set out at Paragraph 1.6, there are three aims of the Equality Act, and Table 1 below shows the relationship of the new Local Plan policies to the aims of the Equality Act.

Table 1: Relationship of the Local Plan Policies to the aims of the Equality Act

Aim	Yes/No or N/A	Details if Yes
Eliminate Unlawful discrimination	Yes	The Plan aims to ensure the sustainable development of Tunbridge Wells borough for the next 15 years. The promotion of balanced and inclusive communities that benefit all is integral to achieving this, and the policies set out in Table 3 of this EqlA demonstrate that the Plan is not unlawfully discriminatory.
Advance Equality of Opportunity	Yes	The Plan aims to promote balanced, inclusive, and sustainable communities that benefit all. Many of the policies within the Plan will benefit the wider community in Tunbridge Wells borough and not specifically those with protected characteristics, either positively or negatively. However, some policies will have the potential for some direct or indirect impact on equalities issues, such as Gypsy and Traveller provision.
Foster Good Relations	Yes	The Plan and policies set out within it are inclusive and aim to foster good relations with those within the protected characteristics classifications, for instance in relation to meeting housing need for all groups, the provision of extended and new health provision, services, facilities, leisure and recreation, local employment, and improved transport provision by all modes.

The Equalities Profile of Tunbridge Wells borough

- 1.13 Table 2 below sums up the baseline information of the different protected characteristics and Income and Deprivation, which are focused upon as part of the assessment. The characteristics are in accordance with the list set out above:

Table 2: Summary of baseline information of protected characteristics and income and deprivation

Protected Characteristics	Tunbridge Wells Borough Council Summary																																			
Age	<p>The 2011 Census population figure for Tunbridge Wells borough is 115,049 persons in some 47,174 households. The Census shows that 18% of people are aged over 65. The average age of the borough's population is 40.</p> <p>Statistics from Kent County Council's policy-based demographic projections (2018) indicate that there will be a:</p> <ul style="list-style-type: none">• 20% increase in the population of the borough between 2017-2037• 9.6% increase (2,300 people) of children aged between 0-15 between 2017-2037• 11.9% increase (8,600 people) people of working age (16-64) between 2017-2037• 55.1% increase (12,3000) people aged 65+ between 2017-2037.																																			
Gender	The 2011 Census identifies that within the borough 51% of the population is female and 49% of the population is male.																																			
Disability	<p>The 2011 Census identifies that 27% of people state they have a long-term health problem or disability. 14% of people in the borough have their day-to-day activities limited a little or a lot by a long-term health problem or disability.</p> <p>Population</p> <table><tr><td><i>Disability by age</i></td><td>Age 0-15</td><td>Age 16-49</td><td>Age 50-64</td><td>Age 65+</td></tr><tr><td>Day-to-day activities limited a lot</td><td>1.2% (290)</td><td>2.7% (1,402)</td><td>6.3% (1,324)</td><td>20.7% (3,956)</td></tr><tr><td>Day-to-day activities limited a little</td><td>2% (470)</td><td>4.4% (2,280)</td><td>9.6% (2,018)</td><td>24.3% (4,631)</td></tr></table> <p>Source (Census 2011)</p> <table><tr><td><i>Possible numbers based on population projections</i></td><td>Age 0-15</td><td>Age 16-64</td><td>Age 65+</td></tr><tr><td></td><td>(26,000)</td><td>(80,600)</td><td>(34,700)</td></tr><tr><td>Day-to-day activities limited a lot</td><td>312</td><td>2,176</td><td>7,183</td></tr><tr><td>Day-to-day activities limited a little</td><td>520</td><td>3,546</td><td>8,432</td></tr></table>					<i>Disability by age</i>	Age 0-15	Age 16-49	Age 50-64	Age 65+	Day-to-day activities limited a lot	1.2% (290)	2.7% (1,402)	6.3% (1,324)	20.7% (3,956)	Day-to-day activities limited a little	2% (470)	4.4% (2,280)	9.6% (2,018)	24.3% (4,631)	<i>Possible numbers based on population projections</i>	Age 0-15	Age 16-64	Age 65+		(26,000)	(80,600)	(34,700)	Day-to-day activities limited a lot	312	2,176	7,183	Day-to-day activities limited a little	520	3,546	8,432
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Protected Characteristics	Tunbridge Wells Borough Council Summary
Race	Tunbridge Wells borough has a low proportion of people from black and ethnic minority groups, The Census figures show that 5% of people in the borough are from a Black, Asian or Minority Ethnic (BAME) background. This compares to a national average of 14% of BAME backgrounds. Within the borough there is a small Gypsy/Traveller community, particularly in the eastern parts of the borough.
Religion or belief	The 2011 Census shows that 63% of the borough's population is Christian and 27% stated that they had no religion. This is higher than the national figures of 59% of the population as Christian and 25% recorded as having no religion. Small proportions of the remainder of the population are Muslim, Buddhist, Hindu, Sikh, and Jewish. There is no evidence to suggest a spatial variation within the borough with regard to religion or belief.
Sexual orientation	There is very limited data relating to sexual orientation in the Tunbridge Wells borough population. Sexual orientation data is not captured by the Census 2011. However, the 2011 Census data identifies that within the borough, 0.1% of the population are in a registered same-sex civil partnership. There is no evidence to suggest a spatial variation within the borough with regard to sexual orientation.
Gender reassignment	There is no known data relating to gender reassignment in the Tunbridge Wells borough population. Gender reassignment data is not captured by the Census (2011).
Pregnancy and maternity	In 2019, there were 57 births per 1,000 of the borough's population.
Income and deprivation (although not part of the EqIA, income and deprivation has been assessed as part of this overall assessment)	<p>According to the Index of Multiple Deprivation (IMD 2019), Tunbridge Wells ranks as the least deprived local authority in Kent.</p> <p>However, there are pockets of deprivation across the borough and three wards (Broadwater, Southborough and High Brooms, and Sherwood) fall within the -40% most deprived category.</p>

2.0 The Equality Impact Assessment

Stage 1: Initial Screening

- 2.1 The purpose of the screening process is to see if the new Local Plan presents any issues for any group of people. The screening process determines whether or not it is necessary to carry out a full Equality Impact Assessment for this area of work. The main question being considered is whether the new Local Plan has the potential to cause any adverse impact or discrimination against different groups in the community.
- 2.2 It is considered that the scope of the new Local Plan may have the potential for adverse impact or discrimination against people with protected characteristics in view of its significance in terms of land use and development across the whole borough over an extended period. Therefore, it is considered necessary to carry out an EqlA of the new Local Plan.

Stage 2: Scoping and Defining

- 2.3 In developing an EqlA it is appropriate to utilise differing perspectives and experiences in its preparation. Ideally, the officers responsible for delivering the strategy are involved in its preparation along with others who have technical or specialist knowledge, where appropriate.
- 2.4 This EqlA has been prepared by officers in the Planning Policy Team who are responsible for the Local Plan preparation, with advice, guidance, and a summary of the assessment from officers of the Council's Corporate Governance Team.
- 2.5 There are pockets of deprivation within the borough as identified within the Index of Multiple Deprivation. Given this information, it was considered appropriate to include low-income groups as part of the assessment to consider whether they are unfairly discriminated against in comparison to other communities within Tunbridge Wells borough. Therefore, in the EqlA of the Local Plan, 'Income Deprivation' will be assessed together with the eight protected characteristics defined by the Equality Act 2010 and reported on in a separate section of this EqlA.

- 2.6 Although the Equality Act defines nine protected characteristics, it has not been considered necessary to include an assessment against 'marriage and civil partnership' as this is only considered to be relevant in an employment context so not relevant for the new Local Plan EqlA to consider.
- 2.7 It is noted that Tunbridge Wells Borough Council also looks at the armed forces community as a corporate objective within some EqlAs, as part of a commitment under the Armed Forces Community Covenant; however, it has not been considered appropriate or necessary to consider the armed forces community within the scope of this EqlA of the policies of the new Local Plan, since there is no particular spatial concentration of the armed forces community that would be impacted on by proposals in the new Local Plan.

Stage 3: Information Gathering

- 2.8 In producing the EqlA, various sources of information have been gathered to determine whether the new Local Plan is likely to have an adverse impact on, or discriminate against, different groups within the community. Such sources of information include Census data and local and national statistics.
- 2.9 A draft EqlA was prepared to support the Regulation 18 and 19 versions of the Local Plan and no comments were received specifically on this document; however, comments were received on the Local Plan document itself which relate to the protected characteristic groups. These have been considered alongside other matters in the Submission version of the Local Plan.
- 2.10 Formal consultation was carried out with a number of voluntary groups, charities, community groups, faith groups, and youth groups, including: the Tunbridge Wells Access Group; Tunbridge Wells Over Fifty Forum; West Kent YMCA; Age UK; and the Equal Opportunities Commission.
- 2.11 Full details of consultation on the Plan and outcomes are detailed in the respective Consultation Statements for both the Draft and Pre-Submission versions of the Local Plan, which is a statutory requirement of the local plan regulations and will be submitted to the Local Plan Inspector alongside the new Local Plan.

Stage 4: Making a Judgement

- 2.12 The policies contained within the new Local Plan aim to deliver the vision, objectives, and strategy set out within the Local Plan. All the policies contained within the new Local Plan are assessed as part of this EqIA.
- 2.13 The table set out within Section 3 of this EqIA (Table 3) assesses the impact of the policies contained within the new Local Plan on the identified protected characteristics. The table contains the Policy number and title, an assessment of the impact of the Policy on each protected characteristic, along with a commentary on whether there is any potential impact by the Policy on the protected characteristics
- 2.14 Section 4 of this report summarises the effects of the Local Plan as a whole on the 'protected characteristics' covered under the Equality Act 2010. This EqIA relates to the policy wording of the Local Plan at the Submission stage of Local Plan preparation. The equalities assessment builds on the assessments previously undertaken for the Regulation 18/19 stages and considers any potential risk the policies in the Plan may have upon each of the protected characteristics. Since the screening of the Pre-Submission Local Plan policies, the Plan has been subject to some proposed amendments, known as Additional (minor) Modifications. The nature of these changes are not considered to impact on any of the protected characteristics of the Equality Act 2010, as they are mainly grammatical or changes to provide additional clarity on some of the policies within the Plan. Resultantly, the content of the policies and how they impact upon the protected characteristics remains unchanged, and therefore it is concluded that no negative impacts on the protected characteristics has resulted from the amendments.

3.0 Analysis of Local Plan Policies

Table 3: Tunbridge Wells Borough Council Local Plan Equality Impact Assessment

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
STR 1	The Development Strategy and Limits to Built Development	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy sets out the locations of key strategic development of the borough. The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics.
STR 2	Place shaping and design	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy aims to ensure that development and design takes into account the needs of all residents and users in the design of new development. In particular it refers to developments being accessible to all as well as being legible and adaptable. It has a range of positive impacts for a number of the

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											characteristic groups.
STR 3	Brownfield Land	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy is intended to aid decision making over the new plan period where proposals relate to development of brownfield sites. The impact on protected characteristics is neutral.
STR 4	Ensuring comprehensive development	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy aims to provide a mechanism to deliver development in a comprehensive and timely way. The impact on protected characteristics is neutral.
STR 5	Essential Infrastructure and Connectivity	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	The policy seeks to address all forms of infrastructure to serve new development (including health, education, digital etc) and therefore has a positive impact on a range

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											of protected characteristics in terms of ensuring appropriate and accessible infrastructure to all of the community.
STR 6	Transport and Parking	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy promotes sustainable transport modes throughout the borough. The policy covers the wide range of transport options focusing on providing alternatives for all members of the community. There is the potential for a particularly positive impact towards those on low income, those with reduced mobility and the elderly and young.
STR 7	Climate Change	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to reinforce the importance attached to both mitigating and adapting to the impacts of climate change in the Local

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											Plan. The impact on protected characteristics is neutral.
STR 8	Conserving and enhancing the natural, built, and historic environment	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to conserve and enhance the natural, built and historic environment. The impact on protected characteristics is neutral.
STR 9	Green Belt	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy sets out the Councils approach to the protection of Green Belt as well as the release of Green Belt and has no impact on protected characteristics
STR 10	Neighbourhood Plans	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Reflects national policy in relation to Neighbourhood Plans. No impact on any particular characteristic.
STR/RTW 1	The Strategy for Royal Tunbridge Wells	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy sets the strategy for Royal Tunbridge Wells, through the

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											provision of a range of uses to meet the needs of all of the community. In particular it is considered to have positive impacts in relation to meeting housing need for all groups, the provision of extended and new education and health provision, services, facilities, leisure and recreation, local employment and improved transport provision by all modes.
STR/RTW2	The Strategy for Royal Tunbridge Wells Town Centre	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy sets out the strategic approach to development within the Town Centre of Royal Tunbridge Wells. The policy seeks to contribute positively towards the range of uses within the town centre including for retail, leisure, service and residential uses.

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
AL/RTW 1	Former Cinema Site, Mount Pleasant Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide a new cinema, restaurants, shops and new housing in the centre of the town. It is considered that it would benefit all groups in terms of the provision of local leisure facilities and housing.
AL/RTW 2	Land at the Auction House, Linden Park Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new office employment space within the Town Centre of RTW and is considered to have a neutral impact.
AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 4	Land at 36-46 St John's Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											considered to have a neutral impact.
AL/RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 6	Land at 202 and 230 Upper Grosvenor Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 7	Land at former Gas Works, Sandhurst Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 8	Land at TN2 Centre and adjacent land, Greggs Wood Road, Sherwood	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy seeks to provide a new community centre including a health facility and will have a positive impact on a number of protected

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											characteristics, including all age groups, those with disabilities and all income groups.
AL/RTW 9	Land at Beechwood Sacred Heart School	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy seeks to provide retirement housing and/or a residential care home and will have a positive impact on a number of the protected characteristics, including age and those with disabilities.
AL/RTW 10	Montacute Gardens	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 11	Former Plant & Tool Hire, Eridge Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new residential or a mix of uses to include employment/retail development and is considered to have a neutral impact.
AL/RTW 12	Land at Tunbridge Wells Telephone	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new

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	Engineering Centre, Broadwater Down										housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 13	Turners Pie Factory, Broadwater Lane	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 14	Land at Wyevale Garden Centre, Eridge Road	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide a mix of uses on the site, to include A1 retail and residential. It is considered that it has a positive impact on some characteristic groups due to the provision of retail uses at the local level accessible to all and residential.
AL/RTW 15	Land at Rowan Tree Road, Showfields Road	Positive	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Positive	The policy seeks to provide a range of community uses to include a new medical centre as well as re-provided residential development and

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											enhanced community facilities providing a range of positive benefits to characteristic groups.
AL/RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs as well as a new secondary school and is considered to have a positive impact on the young due to increased education provision.
AL/RTW 17	Land adjacent to Longfield Road	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new employment development to serve local residents and is considered that it could have a positive impact on some characteristic groups through the provision of local employment opportunities.
AL/RTW 18	Land at the former North Farm landfill	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide sports and

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
	site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate										leisure uses or be used for the generation of renewable energy. It is considered that it has a neutral impact on characteristic groups.
AL/RTW 19	Land to the north of Hawkenbury Recreation Ground	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 20	Land at Culverden Stadium, Culverden Down	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 21	Land at Colebrook Sports Field, Liptraps Lane	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/RTW 22	Land at Bayham Sports Field West	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											housing development to meet housing needs and is considered to have a neutral impact.
STR/SO 1	The Strategy for Southborough	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	The policy sets the strategy for Southborough, through the provision of a range of uses to meet the needs of all of the community. In particular it is considered to have positive impacts in relation to meeting housing need for all groups, the provision of extended and new health provision, services, facilities, leisure and recreation, local employment and improved transport provision by all modes.
AL/SO 1	Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is

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											considered to have a neutral impact.
AL/SO 2	Land at Mabledon House	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides for the development of a new luxury hotel and is considered to have a neutral impact on characteristic groups.
AL/SO 3	Land at Baldwins Farm	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
STR/SS 1	The Strategy for Paddock Wood and east Capel	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy supports the provision of a significant number of new homes within this area as well as a range of other services and facilities, including health, education, sport and recreation and helping to meet local housing need. It is considered to benefit a number of

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											characteristic groups.
STR/SS 2	The Strategy for Paddock Wood Town Centre	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy sets out the strategic approach to development within the Town Centre of Paddock Wood. The policy seeks to contribute positively towards the range of uses within the town centre including for retail, leisure, service and residential uses.
STR/SS 3	Tudeley Village	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	This policy will benefit a number of protected characteristic groups as it promotes development with services, facilities (including health, education, community centre, sport and recreation) as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics,

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											including all age groups, those with disabilities and all income groups.
STR/PW 1	The Strategy for the parish of Paddock Wood	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	This policy will benefit a number of protected characteristic groups as it promotes development with services, facilities (including health, education, community centre, sport and recreation) as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups
AL/PW 1	Land at Mascalls Farm	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.

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STR/CA 1	The Strategy for Capel Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	This policy will benefit a number of protected characteristic groups as it promotes development with services, facilities (including health, education, a community centre, sport and recreation) as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
STR/CRS 1	The Strategy for Cranbrook and Sissinghurst Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	This policy will benefit all sections of the community as it promotes development with services, facilities (including health, education, community centre, sport and recreation) as well as helping to meet local housing need.

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
AL/CRS 1	Land adjoining Wilsley Farm, adjacent to Angley Road and Whitewell Lane	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will make a positive contribution to housing need in the borough and will have positive impacts on the provision of local greenspace, recreation and provision for pedestrians.
AL/CRS 2	Turnden Farm, Hartley Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/CRS 3	Land at Brick Kilm Farm, Cranbrook	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is

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											considered to have a neutral impact.
AL/CRS 4	Land south of Corn Hill, Crane Valley, Cranbrook	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/CRS 5	Land adjoining Cranbrook Primary School, Quaker Lane	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and also safeguards land for a primary school expansion if required – thus having a positive impact on the young through provision of education.
AL/CRS 6	Cranbrook School	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy aims to provide enhanced educational facilities as well as ancillary sports, leisure and community uses to be available to the whole community. This could have a positive impact in

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											particular on younger people through enhanced education opportunities.
AL/CRS 7	Sissinghurst Castle Garden	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	This policy seeks to protect Sissinghurst Castle Garden and its setting and is considered to have a neutral impact.
AL/CRS 8	Land south of The Street	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/CRS 9	Land at corner of Frittenden Road and Common Road, Sissinghurst	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
STR/HA 1	The Strategy for Hawkhurst Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	This policy will benefit a number of protected characteristic groups as it promotes development with services, facilities

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											(including health, education, community centre, sport and recreation) as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
AL/HA 1	Land at The White House, Highgate Hill	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/HA 2	Brook House, Cranbrook Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/HA 3	Former Site of Springfield Nurseries	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to

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											meet housing needs and is considered to have a neutral impact.
AL/HA 4	Land off Copthall Avenue and Highgate Hill	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and areas of open space and is considered to have a neutral impact.
AL/HA 5	Sports Pavilion, King George V Playing Fields, The Moor	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	The policy provides for a new community facility offering a range of services and facilities as well as outdoor play space. It is considered to have a positive impact on a number of characteristic groups and of benefit to the whole community.
AL/HA 6	Hawkhurst Station Business Park	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy provides employment land for a range of employment generating uses offering local job opportunities and adding to the local

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											economy – is considered to have a positive benefit to income and deprivation considerations.
AL/HA 7	Site at Limes Grove (March's Field)	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy safeguards land for future employment generating uses should their be the need for additional employment land to meet future needs. It is considered to have a neutral impact.
PSTR/BE 1	The Strategy for Benenden Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with services and facilities as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.

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AL/BE 1	Land adjacent to New Pond Road (known as Uphill)	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/BE 2	Feoffee Cottages and land, Walkhurst Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/BE 3	Land at Benenden Hospital (south of Goddards Green Road), East End	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/BE 4	Land at Benenden Hospital (north of Goddards Green Road), East End	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
PSTR/BI 1	The Strategy for Bidborough Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community

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											as it promotes development with services and facilities as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
PSTR/BM 1	The Strategy for Brenchley and Matfield Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with services and facilities as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
AL/BM 1	Land between Brenchley Road,	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing

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	Coppers Lane, and Maidstone Road										development to meet housing needs and is considered to have a neutral impact.
AL/BM 2	Land at Maidstone Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
PSTR/FR 1	The Strategy for Frittenden Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with contributions towards services and facilities as well as helping to meet local housing need and open space and recreation provision. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.

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AL/FR 1	Land at Cranbrook Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
PSTR/GO 1	The Strategy for Goudhurst Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with contributions towards services and facilities as well as helping to meet local housing need as well as open space and recreation provision. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
AL/GO 1	Land east of Balcombes Hill and adjacent to Tiddymotts Lane	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing

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											needs and is considered to have a neutral impact.
AL/GO 2	Land at Triggs Farm, Cranbrook Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
PSTR/HO 1	The Strategy for Horsmonden Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with services and facilities as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
AL/HO 1	Land adjacent to Furnace Lane and Gibbet Lane	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is

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											considered to have a neutral impact.
AL/HO 2	Land south of Brenchley Road and west of Fromandez Drive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/HO 3	Land to the east of Horsmonden	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
PSTR/LA 1	The Strategy for Lamberhurst Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with contributions towards local services and facilities as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with

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											disabilities and all income groups.
AL/LA 1	Land to the west of Spray Hill	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs as well as safeguarding land for future education uses and is considered to generally have a neutral impact.
PSTR/PE 1	The Strategy for Pembury Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with services and facilities as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
AL/PE 1	Land rear of High Street and west of Chalket Lane	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to

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											meet housing needs and is considered to have a neutral impact.
AL/PE 2	Land at Hubbles Farm and south of Hastings Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/PE 3	Land north of the A21, south and west of Hastings Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/PE 4	Land at Downingbury Farm, Maidstone Road	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs as well as land for economic uses and safeguarding land for expansion of the hospice. It is considered to have a positive impact on a number of characteristic groups as well as

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											on income and deprivation.
AL/PE 5	Land at Sturgeons fronting Henwood Green Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
AL/PE 6	Woodsgate Corner, Pembury	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	This policy is for the provision of specialist housing for older people and others with care needs and will have a positive impact on a number of protected characteristics including age and those with disabilities.
AL/PE 7	Cornford Court, Comfort Lane	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	This policy is for the allocation of an integrated community health care facility including the provision of an integrated Community Day Care Centre, and will impact positively upon the

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											protected characteristics of age and those with disabilities in particular.
AL/PE 8	Owlsnest, Tonbridge Road	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	This policy relates to the allocation of a care home, and will have a positive impact on a number of protected characteristics including age, those with disabilities.
PSTR/RU 1	The Strategy for Rusthall Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with contributions towards local services and facilities as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											disabilities and all income groups.
AL/RU 1	Lifestyle Motor Europe, Langton Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
PSTR/SA 1	The Strategy for Sandhurst Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with contributions towards services and facilities as well as helping to meet local housing need and local leisure and recreation facilities. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
AL/SA 1	Land on the south side of Sayville, Rye Road and west of Marsh	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to

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	Quarter Lane, Sandhurst										meet housing needs and is considered to have a neutral impact.
AL/SA 2	Sharps Hill Farm, Queen Street	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to meet housing needs and is considered to have a neutral impact.
PSTR/SP 1	The Strategy for Speldhurst Parish	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will benefit all sections of the community as it promotes development with contributions towards local services and facilities as well as helping to meet local housing need. Policy will have a positive impact on a number of protected characteristics, including all age groups, those with disabilities and all income groups.
AL/SP 1	Land to the west of Langton Road and south of Ferbies	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to provide new housing development to

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											meet housing needs and is considered to have a neutral impact.
AL/SP 2	Land adjacent to Rusthall recreation ground, Southwood Road	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy allocates land for additional recreation provision and is considered to have a neutral impact.
EN 1	Sustainable Design	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides design guidance for all new development within the borough and ensures that development is accessible and takes account of residential amenity, inclusivity, and access for all, thus having a positive impact on a number of characteristic groups.
EN 2	Sustainable Design Standards	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on sustainable design standards – it is considered to have a neutral impact on protected

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											characteristic groups.
EN 3	Climate Change Mitigation and Adaptation	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on climate change adaption and mitigation which should be made in the future to combat the impacts of climate change – this is considered to have a positive impact on some more vulnerable characteristic groups, including the elderly and young.
EN 4	Historic environment	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of the historic environment – it is considered to have a neutral impact on protected characteristic groups.
EN 5	Heritage Assets	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of Heritage Assets – it is considered to have a neutral impact on protected

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
											characteristic groups.
EN 6	Shop Fronts	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of historic shop fronts – it is considered to have a neutral impact on protected characteristic groups.
EN 7	Advertisements	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the control of advertisements – it is considered to have a neutral impact on protected characteristic groups.
EN 8	Outdoor Lighting and Dark Skies	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the impact of development in relation to outdoor lighting and dark skies– it is considered to have a neutral impact on protected characteristic groups.
EN 9	Net Gains for Nature: biodiversity	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the Councils approach

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											to Net Gains for Nature: biodiversity – it is considered to have a neutral impact on protected characteristic groups.
EN 10	Protection of designated sites and habitats	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of Designated Sites and Habitats – it is considered to have a neutral impact on protected characteristic groups.
EN 11	Ashdown Forest Special Protection Area and Special Area of Conservation	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the Ashdown Forest Special Protection Area and Special Area of Conservation – it is considered to have a neutral impact on protected characteristic groups.
EN 12	Trees, Woodlands, Hedges, and Development	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on trees, woodlands, hedges and development – it is considered to have a neutral impact on protected

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											characteristic groups.
EN 13	Ancient Woodland and Veteran Trees	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on Ancient Woodland and Veteran Trees – it is considered to have a neutral impact on protected characteristic groups.
EN 14	Green, Grey, and Blue Infrastructure	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on Green, Grey and Blue Infrastructure – it is considered to have a neutral impact on protected characteristic groups.
EN 15	Local Green Space	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on areas designated as Local Green Space – it is considered that it has a neutral impact on protected characteristic groups.
EN 16	Landscape within the built environment	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of the landscape within the Built Environment – it is

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											considered to have a neutral impact on characteristic groups.
EN 17	Arcadian Areas	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of designated Arcadian Areas – it is considered to have a neutral impact on characteristic groups.
EN 18	Rural Landscape	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of the rural landscape across the borough – it is considered to have a neutral impact on characteristic groups.
EN 19	High Weald Area of Outstanding Natural Beauty (AONB)	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of the designated Area of Outstanding Natural Beauty across the borough – it is considered to have a neutral impact on

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											characteristic groups.
EN 20	Agricultural Land	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the protection of the best and most versatile Agricultural Land - it is considered to have a neutral impact on characteristic groups.
EN 21	Air Quality	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to improve air quality across the borough and sets our mitigation requirements as part of any new development – it is considered that this could have a positive impact on some characteristic groups such as those at greater risk of impact from poor air quality such as the young and old.
EN 22	Air Quality Management Areas (AQMA)	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to improve air quality across the borough and sets our mitigation

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											requirements as part of any new development – it is considered that this could have a positive impact on some characteristic groups such as those at greater risk of impact from poor air quality such as the young and old.
EN 23	Biomass Technology	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to support the use of Biomass Technology where appropriate across the borough – it is considered to have a neutral impact on characteristic groups.
EN 24	Water Quality, Supply, and Treatment	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to ensure that all new development has adequate water supply and wastewater treatment facilities in place across the borough – it is considered to have a neutral impact on characteristic groups.

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EN 25	Conservation of water resources	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to ensure the adequate conservation of water resources and minimising the impact of new development on resources across the borough. It is considered to have a neutral impact on characteristic groups.
EN 26	Flood Risk	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy seeks to reduce flood risk and resist unacceptable development in Flood Zone areas – it is considered that this could have a positive impact on certain characteristic groups – particularly vulnerable groups such as the elderly or disabled.
EN 27	Sustainable Drainage	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy provides guidance to ensure that all new development has adequate drainage provision – it is

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											considered to have a neutral impact on characteristic groups.
EN 28	Noise	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy reflects national policy in relation to noise – no impact on any particular characteristics.
EN 29	Land Contamination	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy reflects national policy in relation to land contamination – no impact on any particular characteristics.
H 1	Housing Mix	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Policy reflects National Policy in relation to appropriate housing mix in all new developments and is considered to have a positive impact on certain protected characteristic groups due to the provision of a range of housing types to suit all sectors of the community.
H 2	Housing Density	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy reflects National Policy in

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											relation to maximising efficient use of land and building at appropriate densities – it is considered to have a neutral impact.
H 3	Affordable Housing	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Promoting affordable housing will contribute towards a mix of housing provision to cater for all groups. The policy will be used to ensure affordable provision is developed to address needs helping to address affordability issues.
H 4	Estate Regeneration	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy aims to resist the loss of affordable housing through estate regeneration and is considered to have a positive impact on income and deprivation through resisting the loss of affordable housing stock.

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
H 5	Rural Exception Sites	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy allows for providing affordable housing through the use of rural exception sites in the rural areas ensuring that affordable housing is available for those in need with a connection to the area – it is considered to have a positive impact on a range of characteristic groups and in particular on income and deprivation.
H 6	Housing for Older People	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy provides for housing for older people and is considered to have a positive impact on a number of protected groups, but in particular to older people within the borough.
H 7	Rural Workers' Dwellings	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy allows for the erection of rural workers dwellings subject to certain criteria. Policy has a neutral impact on

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											protected groups but provides housing for rural workers where criteria are met.
H 8	Self-Build and Custom Housebuilding	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy seeks to provide self-build and custom housebuilding plots benefiting all those who wish to build their own house in the borough. It is considered to have a neutral impact on characteristic groups.
H 9	Gypsies and Travellers	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	This policy is specifically to consider those from the travelling community to ensure that appropriate accommodation is provided within the borough to meet their needs.
H 10	Replacement dwellings outside the Limits to Built Development	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy sets control on the principle of replacement dwellings outside the limits to built development. Policy is not considered to have

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											any impact on protected characteristic groups.
H 11	Residential extensions, alterations, outbuildings, and annexes	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy sets control on extensions to residential curtilages Inside the Limits to Built Development. Policy could have a positive impact on provision of living accommodation to suit certain groups – including annexes for the elderly/young/less mobile.
H 12	Extensions to residential curtilages (domestic gardens) outside the Limits to Built Development	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy sets control on extensions to residential curtilages outside the Limits to Built Development. Policy could have a positive impact on provision of living accommodation to suit certain groups – including annexes for the elderly/young/less mobile

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
ED 1	The Key Employment Areas	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Policy aims to ensure the protection and future provision of employment opportunities within the borough to all. Could have positive impact on groups accessing local employment opportunities.
ED 2	Retention of existing employment sites and buildings	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Policy aims to ensure the protection and future provision of employment opportunities within the borough to all. Could have positive impact on groups accessing local employment opportunities in accessible locations.
ED 3	Digital Communications and Fibre to the premises (FTTP)	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Policy has a positive impact to all community groups through improving the digital communications network in the borough. In particular positive

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											impacts on some characteristic groups, including young and old, those less mobile and lower income groups to ensure technology is available to all.
ED 4	Rural Diversification	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy considered to have a neutral impact on protected groups, but could benefit those living in rural areas in accessing local employment as part of farm diversification schemes.
ED 5	Conversion of Rural Buildings outside the Limits to Built Development	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy considered to have a neutral impact on protected groups, but could benefit those living in rural areas in accessing local employment as part of farm diversification schemes through the conversion of rural buildings or providing for new housing in the rural areas.

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ED 6	Commercial and private recreational (including equestrian) uses in the countryside	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy seeks to support appropriate commercial and private recreational uses within the countryside. It is considered it has a neutral impact on protected characteristic groups.
ED 7	Retention of, and promotion of new, tourist accommodation and attractions	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy supports the retention and promotion of tourism accommodation and attractions within the borough. There is generally a neutral impact on protected groups, although tourism does form an important employment generator in the borough so ensures employment provision in this sector is retained.
ED 8	Town, Rural Service, Neighbourhood, and Village	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy will ensure that town centre development is focused towards the existing centres

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	Settlements Hierarchy										as a priority which is expected to have a neutral or positive impact for all. It will ensure that a range of shopping facilities are available in accessible locations for all.
ED 9	Defined Town and Rural Service Centres	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	This policy promotes a town centre first approach to town centre development and aims to maintain the vitality and viability of the borough's town centres.
ED 10	Sequential Test and Local Impact Test	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy reflects national policy with a local impact test and has a neutral impact on protected characteristics.
ED 11	Primary Shopping Areas and Retail Frontages	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy seeks to retain Primary retail frontages in retail and other supporting uses and would have a neutral impact on protected characteristics.

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
ED 12	Retention of local services and facilities	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Policy seeks to retain local services and facilities having a positive impact on a number of protected groups, particularly in terms of accessibility and those less able to travel to access services in particular in relation to the elderly and young, disabled groups and those on lower incomes
TP 1	Transport Assessments, Travel Plans, and Mitigation	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy sets out requirements in relation to transport assessments, travel plans and mitigation and is considered to have a neutral impact on protected characteristic groups.
TP 2	Transport Design and Accessibility	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Policy ensures that there is adequate sustainable transport provision as part of new developments providing for all groups in the community. It is

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											considered to have positive impacts on some characteristic groups.
TP 3	Parking Standards	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy states parking standards for new development and in particular makes provision for those with impaired mobility.
TP 4	Public Car Parks	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to retain existing public car parks to the benefit of all of the community. Could have positive impact on provision of disabled parking as part of overall provision.
TP 5	Safeguarding Railway Land	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy aims to safeguard routes for new railway infrastructure and has a neutral impact on protected characteristics.
TP 6	Safeguarding Roads	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy aims to safeguard routes for new roads and has a neutral impact on protected characteristics.

Policy Number	Policy Title	Age	Gender	Disability	Race, Ethnicity and Nationality	Religion and Belief	Sexual Orientation	Gender Reassignment	Pregnancy and Maternity	Income Deprivation Impact Assessment	Explanation and Evidence
OSSR 1	Retention of Open Space	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy benefits the whole community, through the protection of open space and sports provision across the borough for all users. Policy has particular benefits for some protected groups including younger persons accessing play opportunities and lower income groups through ensuring accessibility of local provision.
OSSR 2	The provision of publicly accessible open space and recreation	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	The policy benefits the whole community, through the provision of open space and sports provision across the borough for all users. Policy has particular benefits for some protected groups including younger persons accessing play opportunities and lower income groups through ensuring

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											accessibility of local provision.

4.0 Summary of Impact Analysis by Characteristic

- 4.1 The new Local Plan contains 157 policies (including all Strategic, Place Shaping, and Development Management Policies) and has the underlying principle to deliver sustainable development to secure a better quality of life for everyone, now and for future generations. All the policies within the Plan contribute towards achieving sustainable development, with policies promoting the location of new homes, jobs and economic growth, improved infrastructure, conservation and enhancement of the natural, built, and historic environment, renewable energy, green spaces, sport and recreation, and the development of balanced communities.
- 4.2 Many of the policies within the Plan will benefit the wider community across Tunbridge Wells borough and not specifically those with protected characteristics. However, some policies will have the potential for some direct or indirect impact on different groups. Each policy has been assessed for its potential positive, negative, or neutral impact on potentially vulnerable equalities groups, as well as the potential to impact on child and adult poverty/deprivation, which is considered later in this section.

Age

- 4.3 The age protected characteristics include the consideration of all ages in society, the assessment of which recognises that vulnerability can change across age groups and the impact of a policy will not necessarily be uniform across all ages. The assessment identified that the impact of the new Local Plan policies were generally positive for all, with some having a particularly positive impact on this group. The new Local Plan aims to provide sustainable development addressing the needs of the current and wider population; this includes provision and access to healthcare, education and training, jobs, appropriate accommodation, and leisure facilities. The policies within the Plan are written positively to ensure that needs are appropriately assessed and addressed through individual development proposals; for example, Policy H 6 (Housing for Older People and People with Disabilities), which will support the ageing population within the borough, as well as Policy H 1 (Housing Mix), both of which ensure that new housing provision meets the identified needs at the local level, including a range of house styles and sizes to cater for all age groups.
- 4.4 In terms of infrastructure, the new Local Plan makes provision for new and enhanced education across the borough, with the allocation of sites for both primary and secondary schools in a number of locations serving both the urban and rural parts of the borough. Policies also seek to protect local services and facilities, which

are particularly important for older and younger residents who may be less able to travel to meet their day-to-day needs.

Disability

- 4.5 The policies within the new Local Plan were identified as being generally positive for all within society, with some policies having positive impacts on this characteristic group. A number of the policies in the new Local Plan address the needs of those with disabilities, either directly or indirectly; for example, Policy H 6 Housing for Older People and People with Disabilities and Strategic Policy STR 2 Place Shaping and Design both set out the requirement that all components of new developments are to be “accessible, legible, adaptable and inclusive to everyone”, while Policy EN 1 (Sustainable Design) under design aspect 6 – Inclusivity and access for all, further reinforces this issue and ensures that all new development is designed to be accessible to all groups in society. These and other policies all have the potential to be of particular benefit for people with disabilities.

Gender reassignment

- 4.6 The policies within the new Local Plan are regarded as being generally positive for all and as having no impact on this group. The promotion of equal opportunities is integral to the integrity of the Plan to support sustainable development. The new Local Plan is inclusive of all members of the community and does not discriminate against any gender reassignment.

Race

- 4.7 The policies within the new Local Plan are regarded as being generally positive for all; the only policy within the new Local Plan that had a positive impact directed particularly at the Race protected characteristic group is Policy H 9 (Gypsies and Travellers). It provides a criteria-based policy which directs appropriate development should additional Gypsy and Traveller sites be required during the plan period.

Religion

- 4.8 The policies within the new Local Plan are regarded as being generally positive for all and as having no differential impact on this group. The promotion of equal opportunities is integral to the integrity of the Plan to support sustainable development. The new Local Plan is inclusive to all members of the community and does not discriminate against any religion.

Sex

- 4.9 The policies within the new Local Plan are regarded as being generally positive for all and as having no differential impact on this group. The promotion of equal opportunities is core to the integrity of the Plan to support sustainable development. The Plan is inclusive of all members of the community and does not discriminate against sex.

Sexual Orientation

- 4.10 The policies within the new Local Plan are regarded as being generally positive for all and as having no differential impact on this group. The promotion of equal opportunities is core to the integrity of the new Local Plan to support sustainable development. The new Local Plan is inclusive of all members of the community and does not discriminate against sexual orientation.

Pregnancy and Maternity

- 4.11 The policies within the new Local Plan are regarded as being generally positive for all. Given the potential healthcare and community infrastructure needs of this protected characteristic group, some of the policies in the Plan have highlighted a positive impact on this group through the assessment of where new health provision is required or land is allocated for new provision. For example, Strategic Policy STR 5 (Infrastructure and Connectivity) ensures that essential healthcare infrastructure is provided as part of new development and a number of sites are specifically allocated for meeting these needs.

Impact Analysis of Income and deprivation

- 4.12 Although Income and Deprivation is not one of the defined protected characteristics, as referred to in Section 1 of this EqlA, it has been considered prudent to assess the impact of the Plan's policies on income and deprivation indicators. The assessment of the impact of the policies on poverty and deprivation supports that the Plan has been written in a positive way with the aim of benefiting all of those in society. The Plan supports the development and enhancement of the local economy, which will support the employment sector, with the aim of providing jobs for the local community.
- 4.13 The housing elements of the new Local Plan ensure that the development of housing provision across the borough provides for the needs of all. Policy H 3

(Affordable Housing) aims to ensure that this includes appropriate levels of affordable housing across the borough and Policy H 5 (Rural Exception Sites) specifically refers to the provision of affordable housing in the rural areas through the use of rural exception sites.

- 4.14 The new Local Plan provides for the appropriate infrastructure across the borough and ensures that the borough is well connected and that different forms of sustainable transport are encouraged. The Plan seeks to protect local services and facilities through Policy ED 12 (Retention of local services and facilities) and allocates for new facilities where necessary and appropriate, with the aim of encouraging local services within neighbourhoods, improving access to services and amenities for all.
- 4.15 Additionally, in terms of employment provision, a strong emphasis of the new Local Plan is the promotion of economic growth and enhancing local employment opportunities for the borough through the release of land for significant employment development, in particular through Policy AL/RTW 17 (Land adjacent to Longfield Road, Royal Tunbridge Wells), which is allocated for approximately 80,000sqm of new employment space. Other policies in the new Local Plan allocate land for further employment use and also the retention of existing employment uses in the Key Employment Areas across the borough. These policies help to ensure that there is an adequate range of employment opportunities available to all groups within the borough.
- 4.16 The new Local Plan has the potential to impact on all protected characteristics as it relates to all people who live in, work in, or visit the borough. It also has the potential to include outcomes that support all aims of the Public Sector Equality Duty. We consider that the Local Plan takes into account the needs of people with protected characteristics.

**If you require this document in another format,
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