


EQUALITY IMPACT ASSESSMENT (EqIA)

Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
 - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
 - advancing equality of opportunity between people who share a protected characteristic and those who do not,
 - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
 - age
 - disability
 - gender reassignment
 - marriage/civil partnership
 - pregnancy/maternity
 - race
 - religion/belief
 - sex/gender
 - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published [online](#).
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:
Rebecca Ewers
Corporate Equality & Diversity Officer
rebecca.ewers@rugby.gov.uk
01788 533509



Equality Impact Assessment

Service Area	Growth and Investment
Policy/Service being assessed	Local Plan – Pre-submission (Regulation 19) version
Is this a new or existing policy/service? If existing policy/service please state date of last assessment	New policy Rugby Borough has a local plan (2011-2031) which was adopted in 2019. It is necessary to review the local plan every 5 years to determine whether it is still up to date. The Council decided to commence a full review of the local plan, and has subsequently held two public consultations: Issues and Options (October 2023-2024) and Preferred Options (March-May 2025). An EQIA was produced for the decisions in respect of both of these consultations.
EqIA Review Team – List of members	Hayley Smith
Date of this assessment	03 December 2025
Signature of responsible officer (to be signed after the EqIA has been completed)	

A copy of the completed and signed Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Officer.

Details of Strategy/ Service/ Policy to be analysed

<u>Stage 1 – Policy to be analysed</u>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>A local plan sets out policies for land use and development. It sets out the strategy for meeting the borough's housing and employment needs over the plan period, along with required infrastructure. In addition, the stated objectives of the local plan are:</p> <ol style="list-style-type: none">1) Support the diversification and growth in sustainable locations of Rugby Borough's economy in line with the Economic Strategy2) Support the revival of Rugby Town Centre3) Reduce carbon emissions and adapt to climate change4) Raise design standards5) Deliver infrastructure-led growth6) Facilitate a greener, more biodiverse borough

<p>(2) How does it fit with Rugby Borough Council's Corporate priorities and your service area priorities?</p>	<p>The local plan is relevant to and aligns with and supports the Council's Corporate priorities:</p> <p>A healthier Rugby – land use and development have a role in promoting healthy behaviours and lifestyles, by affording opportunities for active travel and access to quality parks and open space. In addition, the necessary health facilities and services to support housing growth also form part of the local plan and Infrastructure Delivery Plan.</p> <p>A thriving Rugby – the local plan is part of the 'how' identified in the Corporate Strategy for delivering this priority, and it is amongst the stated objectives of the local plan to support diversification and growth in line with the Economic Strategy and support the revival of Rugby Town Centre (see above). The publication draft of the plan (Regulation 19), includes a spatial strategy and land allocations for employment growth, as well as policies to support the wider economy and Rugby Town Centre. Policy C1 specifically seeks to support the revitalisation of the town centre through specific interventions, including the cultural quarter referenced in the corporate priorities as well as placemaking principles to guide the quality of the environment.</p> <p>A greener Rugby – the publication plan (Regulation 19) includes a policy section on 'climate' which relates to mitigation and adaptation to climate change in line with this corporate priority. It includes a policy to require new buildings to be net zero in operation, a policy to support renewable energy and low carbon technology, a policy on water and efficiency and a climate adaption policy.</p> <p>The 'environment' section of the local plan includes policies on biodiversity and landscapes, and site allocations include principles related to the provision of open space as appropriate.</p> <p>A fairer Rugby – the overarching purpose of the local plan is to set out the borough's development needs over the plan period and the strategy for how these will be met. Housing is a key part of this, and aligns with this corporate priority. The 'housing' section of the plan includes policies regarding affordable housing, specialist housing and HMOs as well as policies relating to housing standards, aimed (in combination with other design policies) at improving the quality of housing delivered.</p>
--	---

(3) What are the expected outcomes you are hoping to achieve?	<p>The local plan sets out the strategy for how the housing, employment and other development needs of the borough will be met over the plan period.</p> <p>It also sets out policies against which planning applications will be assessed and which will therefore guide decision making.</p>
(4) Does or will the policy or decision affect: <ul style="list-style-type: none"> • Customers • Employees • Wider community or groups 	<p>Given the policy content, the geographical scope of the local plan (i.e. the entire borough), and the extent of the plan period to 2042, the local plan has the potential to affect many people who live and/or work in the borough, and who visit during the plan period and beyond. As such, the content of the document is relevant to the Public Sector Equality Duty.</p>
(5) Will the policy or decision involve substantial changes in resources?	<p>Upon adoption of the new local plan (anticipated in 2027), it will replace the currently adopted local plan. Substantial changes in resources are not therefore envisaged.</p>
<u>Stage 2 – Evidence about user population and consultation</u>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, e.g. service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

(1) What does the data tell you about the groups this policy or decision impacts?

Possible data sources:

- national statistics/census data
- local statistics
- evaluations
- analysis of complaints
- user feedback
- outcomes from consultation/community voice
- Council published information, service data
- [District and Ward Profile – Warwickshire Observatory](#)
- [Office of National Statistics](#)
- [Fingertips health profiles](#)
- [Indices of Multiple Deprivation](#)
- [RBC Annual Workforce Equality Report](#)

The data analysis for the local plan has been through a range of evidence base documents. In relation to the local population, these notably include (not an exhaustive list):

- Housing and Economic Development Needs Assessment (HEDNA) (2022) and Addendum Report (2024) – this report was prepared on behalf of the Coventry and Warwickshire Local Authorities to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs.
- Housing Needs Report (2025) – updates the housing need information in the HEDNA for different groups
- Gypsy and Traveller, Travelling Showperson and Houseboat Accommodation Needs Assessment (2025) – addresses the specific needs of these groups to inform how these may be met through the local plan.
- The Development of the Borough 2011-2024 topic paper – this paper provides a broad overview of how the borough has changed over this period, focussing on demographics, housing, the local economy and the built environment.
- Houses in Multiple Occupation (HMO) topic paper (2025) – this paper examines trends in HMOs within the borough, and examines ways in which the Council might manage their development.
- Sustainability Appraisal (2025) – an evaluation of the social, economic and environmental impacts of the development plan, including reasonable alternative strategies.
- Education topic paper (2025) – this paper summarises the key findings of modelling undertaken for school place provision across the borough. This modelling has informed the spatial strategy of the plan.

<p>(2a) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement?</p> <p>If yes, please state which groups were involved in the consultation and what were their views and how have their views influenced the policy/decision?</p>	<p>The process leading to the production of the Regulation 19 local plan has included two public consultations:</p> <ul style="list-style-type: none"> • Issues and Options (Regulation 18) October 2023 – February 2024 • Preferred Options (Regulation 18) March-May 2025 <p>Details of how the consultations were conducted, summaries of the feedback received, and how at each stage the plan has been amended to reflect the feedback, are set out in the 'Consultation Statement' to be published as part of the evidence for the Regulation 19 publication plan.</p> <p>In addition to the public consultations, officers have liaised with infrastructure and service providers throughout the evolution of the plan, as well as other stakeholders under the Duty to Cooperate. A Duty to Cooperate Statement is in preparation.</p> <p>In summary, all of the above have shaped the strategy and policies of the local plan, with the aim of delivering the objectives outlined above. This EQIA therefore provides a high-level assessment of various policy areas highlighted, based on the protected characteristics.</p> <p>The plan primarily relates to the use and development of land, and seeks to address people's needs in relation to how land is used (i.e. for homes, employment, transport, services and facilities, and in the creation of a well-designed, safe and healthy environment). As such, the policies are intended to have overall beneficial effects for the local population, as they are designed and written to address the needs of everyone. These beneficial effects extend most notably to 'protected characteristics' and other relevant characteristics that can act as a barrier to those needs being met. Appendix 1 sets out a high-level assessment of the impacts of each policy within the Regulation 19 plan on protected characteristics. This illustrates a neutral or positive impact of all policies.</p>
---	--

(2b) If you have not consulted or engaged with communities that are likely to be affected by the policy/decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.	Further to the above consultations, there will be another public consultation on the publication plan (Regulation 19). Following this consultation the plan will be submitted for independent examination in public.		
<u>Stage 3 – Analysis of impact</u>			
(1) <u>Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified	Protected Characteristic	Nature of Impact Positive, Neutral, Adverse (explain why)	Extent of impact Low, medium, high

for any particular group, which could amount to discrimination?

If yes, identify the groups and how they are affected.

Age

Positive impact.

Low

The local plan includes consideration of family housing provision, including affordable housing. The Housing Needs Report (2025) (from p42) sets out the affordable housing need in the borough and updates the position set out in the HEDNA.

The plan seeks to ensure that infrastructure is aligned to development (e.g. schools, health, open space and active travel networks). Evidence of school places (see topic paper) for example, has informed the strategy.

According to 2021 census data, 18.1% of the borough's population is aged over 65 (see Housing Needs Report (2025) from page 91 which updates the information in the HEDNA from page 305). Housing policies (specifically H6) and land allocations support the provision of specialist housing for older persons.

	<p>Disability</p>	<p>Positive impact</p> <p>There are a wide range of needs amongst people living with disability. It is recognised that there can be multiple barriers to living independently and to health and wellbeing. These can include isolation, access to services, transport options, and undersupply of specialist or flexible housing. All of these matters which are relevant to the local plan, which seeks to provide accessible, healthy and inclusive streets, spaces/public realm, open spaces and buildings. Evidence was developed as part of the HEDNA and updated in the Housing Needs Report (2025) in relation to housing needs for people with disabilities. In response, the plan includes policies and allocations for specialist housing, with links identified between age and disability. In addition, policy H7 sets out standards for new housing, including adaptable buildings, and meeting requirements for wheelchair users.</p>	<p>Low/medium</p>

	Sex	<p>No direct impact.</p> <p>The pattern and location of development may have some impacts with regard to gender. These can sometimes be linked to other characteristics such as age, as on average women live longer than men.</p>	Low
	Gender reassignment	<p>No direct impact.</p> <p>Local plan policies seek to respond to the needs of all in the community, avoid discrimination and promote inclusivity. No direct impact is concluded on gender reassignment, though a range of policies will be applicable depending on the individual/household circumstance.</p>	Low
	Marriage/civil partnership	<p>No impact.</p> <p>This characteristic is not considered to be affected differently by the policies within the local plan.</p>	Low

	Pregnancy/maternity	<p>No direct impact.</p> <p>Although it is concluded that there is no direct impact, it is considered that a range of policies within the plan will be applicable depending on the individual/household circumstances.</p> <p>A proportion of the population will be pregnant at any time and/or looking after young children. This may have implications for their housing need, and access to facilities including health care and open space, and eventually schools. How these matters are addressed is relevant to the local plan.</p>	Low
--	---------------------	---	-----

	Race	<p>No direct impact /positive impact</p> <p>The local plan policies and allocations aim to ensure that there is sufficient land to meet the housing and other needs of the population.</p> <p>Policy S4 specifically identifies allocations to meet the accommodation needs of gypsies and travellers as set out in the evidence base. This policy demonstrates a supply of land for gypsy and traveller accommodation, which has not been the case in the current adopted local plan. Hence this is considered a positive impact compared with the current position. Whilst S4 does not identify supply for the entire plan period, efforts continue through the Duty to Cooperate to address this matter.</p>	Low
--	------	---	-----

	Religion/belief	<p>Limited positive impact.</p> <p>Individuals and groups of different religions and faiths may face barriers in accessing suitable places of worship. The local plan can influence the protection of existing community facilities and the location of any new facilities, and can therefore influence opportunities for religious groups to practice their religion and worship</p>	Low
	Sexual Orientation	<p>No direct impact.</p> <p>No direct impact is concluded, though some policies may be relevant dependent upon individual/household circumstances.</p>	Low
<p>(2) <u>Cross cutting themes</u></p> <p>(a) Are your proposals likely to impact on social inequalities e.g. child poverty,</p>	Description of impact	<p>Nature of impact</p> <p>Positive, Neutral, Adverse (explain why)</p>	<p>Extent of impact</p> <p>Low, medium, high</p>

<p>geographically disadvantaged communities? If yes, please explain how?</p>	<p>Socio-economic e.g.: child poverty, income level, education level, working hours/occupation, family/social support, access to good nutrition</p>	<p>Positive As set out above, the evidence underpinning the local plan, the land use and development strategy and policies within it, take account of a range of needs to ensure that the borough delivers the right types of developments for a range of needs. In meeting the identified needs, the local plan aims to have a positive impact in reducing social inequalities. In respect of socio-economic inequalities, the development of the local economy, employment opportunities and skills and community facilities are all influenced by the local plan. A list of policies and an assessment of impact is included in Appendix 1.</p>	<p>Medium</p>
--	--	---	----------------------

	<p>Environmental e.g.: housing status, transport links, geography, access to services, air quality, noise pollution</p>	<p>Positive. Housing delivery and transport links are directly influenced by the local plan, as is access to services. Policies are included in relation to air quality, open space and amenity related design requirements.</p>	<p>Medium</p>
<p>(3) Using the information gathered in stages 2 and 3, please describe how the policy/strategy/service will:</p> <ul style="list-style-type: none"> a. Eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act b. Advance equality of opportunity between people who share and people who do not share a relevant protected characteristic c. Foster good relations between people who share and people who do not share a relevant protected characteristic 	<p>The local plan is concerned with land use and development. There are factors within this which can influence the advance of equality, as has been highlighted above. In summary, the local plan can influence equality of opportunity through planning to meet identified housing need, planning for employment land for jobs, and appropriate expansion or new facilities and services such as school places, where needed. It can also influence opportunities for active travel, supporting local trips, and public transport provision (albeit this is delivered by others) to provide improved accessibility within the borough and beyond.</p> <p>In meeting the development needs of the local community, the local plan has a role in supporting good relations, as frictions and disparities between groups may be reduced.</p>		
<p>(4) Are there any obvious barriers to accessing the service? If yes, how can they be overcome?</p>	<p>Not applicable. The local plan includes strategy and policy.</p>		

<p>(5) What Equality Monitoring Data will be collected to analyse impact? How will the Equality Monitoring Data collected be used?</p> <p>If no Equality Monitoring Data is being collected, why not?</p> <p>For support with this section, please refer to the Equality Monitoring Guidance.</p>	<p>The Council will monitor the implementation and impact of the local plan through the production of its Authority Monitoring Report (AMR). The AMR includes information on delivery against local plan policies, including (but not limited to) the provision of housing (including affordable housing), and employment development.</p>
<p>(6) Complete this section if any adverse impacts were identified in 3.1.</p> <p>Outline any actions that will be taken to remove or mitigate the adverse impacts identified in 3.1 to ensure that no discrimination is taking place. If removing or mitigating the impact is not possible, you may in certain circumstances, justify the discrimination. If that is the case, please give evidence for why justifying is possible in this case.</p>	<p>N/a – no adverse impacts identified.</p>

<p><u>Stage 4 – Action Planning, Review and Monitoring</u></p>	
<p>(1) Data analysis</p> <p>What does feedback from Equality Monitoring Data gathered tell you about impact on groups? Were there any unforeseen impacts (positive or negative)?</p> <p>The feedback/data should be used to inform your Action Plan in (2)</p>	

<p>If No Further Action is required then go to – Review and Monitoring</p> <p>(2) Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.</p>	<p>EqIA Action Plan</p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date for completion</th> <th>Resource requirements</th> <th>Comments</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>					Action	Lead Officer	Date for completion	Resource requirements	Comments																				
Action	Lead Officer	Date for completion	Resource requirements	Comments																										
<p>(3) Review and Monitoring State how and when you will monitor policy and Action Plan. Will you make any changes to the Equality Data that you are collecting or how you are collecting/using the data?</p>																														

Please annotate your policy with the following statement:

‘An Equality Impact Assessment on this policy was undertaken on (03 December 2025) and will be reviewed at the point of adoption of the local plan.’

Appendix 1 – Equalities Impact Assessment, Regulation 19 local plan

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
S1 – Settlement hierarchy	0	0	0	0	0	0	0	0	0
S2 – Strategy for homes	+	+	+	+	+	+	+	+	+
S3 – Strategy for employment land	+	+	+	+	+	+	+	+	+
S4 – Sites for Gypsies and Travellers	0	0	0	0	0	0	+	0	0
S5 – Countryside Protection	0	0	0	0	0	0	0	0	0
S6 – residential allocations	0	0	0	0	0	0	0	0	0
S7 – employment allocations	0	0	0	0	0	0	0	0	0
S8 – South West Rugby	0	0	0	0	0	0	0	0	0
S9 – South West Rugby spine road network	0	0	0	0	0	0	0	0	0
CL1 – Net zero buildings	+	+	+	+	+	+	+	+	+

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
CL2 – Renewable energy and low carbon technology	0	0	0	0	0	0	0	0	0
CL3 – Water supply, water quality and efficiency	0	0	0	0	0	0	0	0	0
CL4 – Climate adaptation	+	+	+	+	+	+	+	+	+
E1 – Employment land protection	0	0	0	0	0	0	0	0	0
E2 – employment development	0	0	0	0	0	0	0	0	0
E3 – rural economy	0	0	0	0	0	0	0	0	0
C1 – Rugby town centre	+	+	+	+	+	+	+	+	+
C2 – Main town centre uses	0	0	0	0	0	0	0	0	0
C3 – Local and district centres	0	0	0	0	0	0	0	0	0
C4 – Neighbourhood hubs	+	+	+	+	+	+	+	+	+
EN1 –	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
Biodiversity and geodiversity protection									
EN2 – Landscape protection	0	0	0	0	0	0	0	0	0
EN3 – Area of elevated landscape sensitivity	0	0	0	0	0	0	0	0	0
EN4 – Areas of separation	0	0	0	0	0	0	0	0	0
EN5 – Biodiversity net gain	+	+	+	+	+	+	+	+	+
EN6 – Canopy cover	+	+	+	+	+	+	+	+	+
EN7 – Flood risk	0	0	0	0	0	0	0	0	0
EN8 – Environmental protection and amenity	+	+	+	+	+	+	+	+	+
EN9 – Air quality	+	+	+	+	+	+	+	+	+
H1 – Housing mix	+	+	+	+	+	+	+	+	+
H2 – Affordable housing	+	+	+	+	+	+	+	+	+
H3 – Rural	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
worker dwellings									
H4 – Rural exception sites	0	0	0	0	0	0	0	0	0
H5 – replacement dwellings	0	0	0	0	0	0	0	0	0
H6 – Specialist housing	+	+	+	+	+	+	+	+	+
H7 – Housing standards	+	+	+	+	+	+	+	+	+
H8 – Houses in Multiple Occupation	+	+	+	+	+	+	+	+	+
W1 – Protection of community facilities	+	+	+	+	+	+	+	+	+
W2 – Open space and sports provision	+	+	+	+	+	+	+	+	+
D1 – Well designed places	+	+	+	+	+	+	+	+	+
D2 – Infill and householder development	0	0	0	0	0	0	0	0	0
D3 - Landscaping	0	0	0	0	0	0	0	0	0

Policy	Age	Disability	Sex	Gender reassignment	Marriage/Civil Partnership	Pregnancy/maternity	Race	Religion/belief	Sexual orientation
D4 – Historic environment	0	0	0	0	0	0	0	0	0
D5 – Sustainable drainage	0	0	0	0	0	0	0	0	0
I1 - Transport	+	+	+	+	+	+	+	+	+
I2 - Parking	+	+	0	0	0	0	0	0	0
I3 – Communication infrastructure	0	0	0	0	0	0	0	0	0
I4 – Infrastructure and planning obligations	0	0	0	0	0	0	0	0	0
I5 – New railway stations	0	0	0	0	0	0	0	0	0