

# Equality Impact Assessment [version 2.12]



Title: Allotment rent and water service charges	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Jonathan James
Service Area: Natural and Marine Environment	Lead Officer role: Head of Natural and Marine Environment

## Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](https://sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

### 1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The Council adopted a new Food Growing and Allotment Strategy in March 2024. The Strategy sets out three commitments: to reduce the number of people waiting to access Council-owned food growing spaces, to deliver new spaces for food growing, and to ensure people from communities across Bristol can access suitable food growing opportunities. To deliver on these commitments the Strategy identifies that we invest in allotments and allotments services and ensure that the service is sustainably funded.

The Council's fees and rents for allotments have not been revised since 2018 and income generated does not meet the costs of service delivery. If not addressed there will be a continued and increasing financial impact on wider Parks services delivered for all citizens. The benefits sought to be delivered through the Food Growing Strategy will be limited, delayed or prevented. The Allotment Service to tenants will continue to be insufficient and its asset base continue to decline, leading to higher long-term costs for the Council.

To address these challenges the service reviewed its current costs of service delivery and the additional resources needed. The cost estimated for a service with the required staff resources and operating budget that supports comprehensive estate management and upkeep is £690K. Forecasted allotment income for 24/25 is £263K.

The Committee report proposes to increase fees whilst expanding the scope of its discount scheme so that more people on low incomes are able to apply for a 50% reduction.

**Proposed, new rental with water charges before discounts applied** - The figures below are the full combined rent and water charge for comparison purposes, but water charges will be expressed as an additional cost rather than a discount on the rent:

Accessible 0-8m2	0 to 74m2	75 to 149m2	150 to 224m2	225 to 349 m2	350 to 449m2	450 to 559 m2	550 to 699m2 (new band)	700 to 999m2
£30	£46	£76	£106	£129	£228	£251	£358	£464

**Current rental with water charges included and before discounts are applied:**

0 to 74m2	75 to 150m2	151 to 224m2	225 to 351 m2	352 to 450m2	451-550m2 or above	703-1000m2
£30	£50	£70	£85	£150	£165	£305

In order to assist low-income persons and families we are expanding the eligibility for the 50% discount to all those receiving any aspect of Universal Credit and Pension Credit. 7% of the Bristol population currently receives Universal Credit, with the expansion of the eligibility to anyone receiving Universal Credit we anticipate more of our tenants will be eligible for the 50% discount. We currently offer 50% discount for those receiving Housing Benefit or Council Tax reduction (latter not applicable to students and single occupancy discounts) (if they receive the latter two, they are likely to be on Universal Credit).

We also encourage collective (community) food growing groups, many of which provide physical and mental health benefits, and provide these at a discounted rate. Our 50% discount on rent recognises the positive social value contribution to disadvantaged groups. This provides a low-cost way that people can engage with food growing.

We provide discount for long serving tenants 50% for 25 years and 100% for 50 years for those who currently receive it (has been discontinued for new applicants since 2018).

We also offer 100% discount (or pro-rata) for voluntary Site Representatives in recognition of their assistance with local supervision of the sites on behalf of the Council.

**1.2 Who will the proposal have the potential to affect?**

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

**1.3 Will the proposal have an equality impact?**

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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**Step 2: What information do we have?****2.1 What data or evidence is there which tells us who is, or could be affected?**

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: [How we measure equality and diversity \(bristol.gov.uk\)](http://bristol.gov.uk)

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics](#)

[and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment](#)

<b>Data / Evidence Source</b> [Include a reference where known]	<b>Summary of what this tells us</b>																																																														
Bristol Quality of Life survey 2023/24 final report	<p>Working an allotment affords access to open space and encourages visits to open space, particularly during warm growing months.</p> <p>Results from the Bristol’s Quality of Life (QoL) survey 2023/24 show that satisfaction the percentage of people who visit green spaces once a week varies based on people’s characteristics and circumstances.</p> <p><b>% who visit Bristol's parks and green spaces at least once a week</b></p> <table border="1" data-bbox="632 904 1289 2134"> <thead> <tr> <th data-bbox="632 904 959 972"><b>Characteristic</b></th> <th data-bbox="959 904 1289 972"><b>Percentage</b></th> </tr> </thead> <tbody> <tr><td>Bristol Average</td><td>57.0%</td></tr> <tr><td>10% most deprived</td><td>39.9%</td></tr> <tr><td>Mixed Ethnicity</td><td>60.2%</td></tr> <tr><td>White</td><td>57.6%</td></tr> <tr><td>White Minority Ethnic</td><td>61.4%</td></tr> <tr><td>Black/Black British</td><td>23.4%</td></tr> <tr><td>Black, Asian &amp; Minority Ethnic</td><td>45.7%</td></tr> <tr><td>Asian/Asian British</td><td>48.0%</td></tr> <tr><td>Christian Religion</td><td>48.1%</td></tr> <tr><td>Other Religions</td><td>52.40%</td></tr> <tr><td>No Religion or Faith</td><td>61.7%</td></tr> <tr><td>Male</td><td>55.60%</td></tr> <tr><td>Female</td><td>57.4%</td></tr> <tr><td>Lesbian, Gay or Bisexual</td><td>55.7%</td></tr> <tr><td>Trans</td><td>51.5%</td></tr> <tr><td>All Carers</td><td>48.3%</td></tr> <tr><td>Full Time Carer</td><td>36.9%</td></tr> <tr><td>Part time carer</td><td>52.8%</td></tr> <tr><td>All parents</td><td>52.9%</td></tr> <tr><td>Single Parent</td><td>69.2%</td></tr> <tr><td>Two Parents</td><td>72.3%</td></tr> <tr><td>Disabled</td><td>38.20%</td></tr> <tr><td>16 to 24 years</td><td>55.1%</td></tr> <tr><td>50 years and older</td><td>45.1%</td></tr> <tr><td>65 years and older</td><td>38.6%</td></tr> <tr><td>Owner occupier</td><td>59.3%</td></tr> <tr><td>Rented (HA)</td><td>41.5%</td></tr> <tr><td>Rented (Council)</td><td>33.2%</td></tr> <tr><td>Rented private</td><td>56.3%</td></tr> <tr><td>No Qualifications</td><td>25.50%</td></tr> </tbody> </table>	<b>Characteristic</b>	<b>Percentage</b>	Bristol Average	57.0%	10% most deprived	39.9%	Mixed Ethnicity	60.2%	White	57.6%	White Minority Ethnic	61.4%	Black/Black British	23.4%	Black, Asian & Minority Ethnic	45.7%	Asian/Asian British	48.0%	Christian Religion	48.1%	Other Religions	52.40%	No Religion or Faith	61.7%	Male	55.60%	Female	57.4%	Lesbian, Gay or Bisexual	55.7%	Trans	51.5%	All Carers	48.3%	Full Time Carer	36.9%	Part time carer	52.8%	All parents	52.9%	Single Parent	69.2%	Two Parents	72.3%	Disabled	38.20%	16 to 24 years	55.1%	50 years and older	45.1%	65 years and older	38.6%	Owner occupier	59.3%	Rented (HA)	41.5%	Rented (Council)	33.2%	Rented private	56.3%	No Qualifications	25.50%
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Non degree qualifications	43.9%
Degree qualifications	64.9%

**Physical activity**, working an allotment plot can bring health benefits through physical exercise.

Results from Bristol’s Quality of Life (QoL) survey 2023/24 found 66.6% of people are physically active (% who do enough regular exercise each week). This decreased to 57.0% for people living in the 10% most deprived areas..

Further population breakdowns available through the Bristol Quality of Life survey 2023/24 include:

- Gender: Women (64.0%) are less likely to be physically active than men (69.6%).
- Ethnicity: Black, Asian and minority Ethnic groups (52.5%) are less likely to be physically active than White minority ethnic groups (75.1% highest group), or White (68.5 % middle group).
- Age: 73.2% of young people aged 16 to 24 years old undertake regular exercise, compared to 55.4% for 50 years old and 46.9% of older people aged 65+.

**Healthier Eating.** Working an allotment plot may also encourage healthier eating through the growing, harvesting and sharing of fresh fruit and vegetables at certain times of year.

Bristol’s Quality of Life Survey in 2023/24 indicates 48.8% of adults in Bristol are meeting the recommended “5 or more portions of fruit and vegetables a day”. Trend - this is lower than the year 2018 (53.9%), the trend is upward ward from 2022/23 after the sharp decline in 2020.

By Ward, people having 5 fruit & veg a day range from 32.2% in Lawrence Hill ward, to 65.4% in Westbury-on-Trym and Henleaze wards.

The association between this indicator and deprivation is not entirely consistent across the range of deprivation, but the proportion of adults eating 5-a-day tends to rise where deprivation is less acute. e.g. 35.0% in the most deprived 10% of the city, 58.7% in the least deprived 10% of the city.

Quality of Life survey responses indicate that men (43.5%), young people (41.6%) and Disabled residents (41.0%), are less likely to be eating 5-a-day fruit and veg than the city average of 48.8%.

**Mental health** is a state of well-being in which the individual realizes their own abilities, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to their community.

Working an allotment plot can bring mental health benefits by encouraging time spent outdoors, generating social activity and generating a sense of achievement through harvesting.

If you have good mental wellbeing, you are able to:

- feel relatively good in yourself and have self-esteem; - feel and express a range of emotions;
- build and maintain good relationships with others;
- feel engaged with the world around you;
- live and work productively;
- cope with the stresses of daily life; adapt and manage in time of change and uncertainty.

14.5% of Bristol residents reported a low life satisfaction score in 2023/24, there has been an upward trend since 2019 (9%).

19.8% have “poor mental wellbeing”, rising to 46.6% in the most deprived areas. Disabled people are the least satisfied with their (55.9%).

Whilst we have not collected demographic data for our tenants anecdotal evidence is there are many in the 50 years and older group.

**Personal Finance**

We current offer discounts for those receiving certain benefits, this will be expanded to all those receiving Universal Credit and Pension Credit.

<b>Indicator</b> % of people who find it difficult to manage financially (data from 22/23 QoL survey)		
<b>Characteristic</b>	<b>Percentage</b>	<b>Comment</b>
10% most deprived	17.5%	These are likely to receive the 50% discount on allotment rental.
Disabled people	25.7%	We propose to introduce a new lower discounted rental rate for accessible plots.
16 to 24 years	18.5%	
50 years and older	7.8%	
65 years and older	5.4%	

[apse.org.uk/index.cfm/apse/members-area/briefings/2023/23-37-state-of-the-market-survey-allotments-2023/](https://apse.org.uk/index.cfm/apse/members-area/briefings/2023/23-37-state-of-the-market-survey-allotments-2023/)

Nationally there is a wide variance in the range of prices for renting allotments. However, it should be noted that it does not appear that larger authorities who employ dedicated staff take part in the survey, hence the rents are more that of Parish Councils who use voluntary staff and may not offer a full service. However, although the rent banding figures used in the survey are low, 46% of respondents say they charge over £70 per annum and 63% are increasing prices in the next five years or are reviewing the need to do so. 22% stated they had increased rates above that of standard inflation.

A better indicator of rental rates (adjusted to include water charges) is to compare with similar sized authorities by looking at their

websites, for example for Band D plots - Plymouth at £192, B&NES £212 (planned rise to £227), Nottingham £178, Sheffield £182 (£192) in February 2024.

The local private sector operator Roots Bristol charge considerably more pro-rata, for example in order to “join” there is a £39 (discounted price) deposit fee payable upon application, with plot sizes Mini 12m2 - £109, Starter 36m2 - £219, Couple 72m2 - £384, Group 108 - £549. The operator has recently removed the plot sizes from their website, but those previously published sizes are stated above. Thus, the proposed cost for our most popular Band B plot 75-150m2 would be £549 and Band D 225-351m2 pro-rata would be £1,270 with the private sector. Whilst the private sector offer a free trowel on joining and some seeds the tenant should consider the actual value of these in relation to the rental cost.

There has been a noticeable increase in demand for allotment plots as a result of COVID-19

Allotment Rent, Tenancy Agreement and Rules Consultation – November 2023 – January 2024

Characteristic	Percentage
<b>Ethnic Group</b>	
Mixed ethnicity	2.0%
White British	71.2%
Other White background	8.4%
Black/Black British, Caribbean or African	1.2%
Asian/Asian British	1.40%
Gypsy, Roma or Traveller	0.1%
Other ethnic background	2.1%
Prefer not to say	13.6%
<b>Sex</b>	
Male	36%
Female	50%
Prefer not to say	13%
Other	1%
<b>Gender identity different from your sex at Birth</b>	
Yes (e.g. trans or non-binary)	1%
No	84%
Prefer not to say	15%
<b>Sexual orientation</b>	
BI	5%
Gay / Lesbian	4%
Heterosexual / straight	59%
Prefer not to say	30%
I use another term	3%
<b>Disabled</b>	
Disabled	10%
Not Disabled	81%

Prefer not to say	8%
<b>Age</b>	
11-15*	0.04%
16-17*	0.04%
18-24	0.54%
25-34	12.80%
35-44	24.43%
45-54	16.88%
55-64	19.81%
65-74	15.13%
75-84	5.65%
85+	0.39%
Prefer not to say	4.29%
Note * - Must be over 18 years old to hold a Tenancy Agreement	
<b>Are pregnant or given birth in last 26 weeks</b>	
Yes	2%
No	86%
Prefer not to say	12%
<b>Carer</b>	
Yes	10%
No	78%
Prefer not to say	11%
<b>Religion/faith</b>	
No religion	57.8%
Buddhist	1.5%
Christian	16.6%
Hindu	0.1%
Jewish	0.4%
Muslim	0.5%
Pagan	1.2%
Sikh	0.0%
Prefer not to say	18.5%
Other	3.5%
<b>Refugee or asylum seeker</b>	
Yes	0.2%
No	89.4%
Prefer not to say	10.4%
<b>Rent increase – agree or disagree</b>	
Strongly agree	3%
Agree	10%
Neither agree nor disagree	9%
Disagree	29%
Strongly disagree	48%
<b>Rent- disagree</b>	
Higher increase	1%

	Lower increase	58%
	No increase	41%
	<b>Effect on your protected characteristics</b>	
	Very negative effect	18.6%
	Slightly negative effect	12.0%
	No effect	67.8%
	Slightly positive effect	0.7%
	Very positive effect	0.9%
	<b>Interested in communal food growing</b>	
	Yes	42%
	No	58%

The consultation revealed that the clear majority of respondents disagreed with the rent increase proposal made (78%), including those with protected characteristics, but the majority (58%) felt that a lower increase would be acceptable. However the difference in response from all respondents when compared with those with protected characteristics is relatively small – for example:

- The difference in response to the question as to whether they agreed or disagreed with the proposal from the consultation as a whole and from those in the 10% most deprived areas of Bristol is 1%.
- The difference in response to this question as to whether they agreed or disagreed with the proposal from the consultation as a whole and from those who consider themselves as Disabled is 1%.
- The difference in response to this question as to whether they agreed or disagreed with the proposal from the consultation as a whole and Asian or Asian British respondents is 4% (82%), from mixed or multiple ethnic groups is 4% (82%), from Black Caribbean or African is 3%.

Over two thirds, 69.4%, of respondents didn't feel that the proposal would have an effect on their protected characteristic.

Refer to Appendix F (consultation report) to the Committee report.

**Additional comments:**

## 2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input type="checkbox"/> Age	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation

## 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without



the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

There are gaps in our evidence base in terms of who our tenants are and how many of these hold particular protected characteristics. However the public consultation (see Appendix F) allows us a clear view of the views of respondents with by protected characteristic, and how these views compare with respondents as a whole.

## 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol’s diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing a change process or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

Between 11 December 2023 and 31 January 2024, Bristol City Council consulted on proposed changes to allotment rents and other fees and charges, and some changes to activities permitted on allotments under the allotment tenancy agreement. There were 3,016 survey responses with 2,332 survey free text responses and 112 email responses.

Online and paper versions of the consultation document were shared via the following council and partner channels and networks:

- 3,500 allotment tenants via email
- 450 letters sent to allotment tenants without emails
- 8,000 prospective allotment tenants on the waiting list via email
- 5 allotment associations provided with information to share with their tenants.
- Other stakeholders e.g. Bristol food producers, Feeding Bristol, Bristol Food Network.
- Ward councillors
- Subscribers to Ask Bristol e-bulletin – delivered to 7,800 recipients on 30 January 2024

A number of themes arose from the Allotment Rents, Tenancy Agreement and Rules consultation in relation to allotment rents from the consultation process:

Themes	Response
The rent increase is too high. Because of the length of time since the last price increase, the scale of the increase is too high to apply all in one go.	Given the time that has elapsed since the last rent uplift, the impact of inflation, the need to make service improvements and comparison with other authorities we are unable to hold rent at 2018 levels any further. We have not sought a fee structure that will meet the full cost of providing the service. Increase to rents are subject to a 12 months’ notice period and we are introducing an option to pay quarterly or monthly by direct debit.
As an allotment tenant the service needs to improve if the rents increase – value for money.  Supportive of rental increase - if [for example] this helps the service improve and motivates people to look after their plots.	The Food Growing and Allotments Strategy sets out our aspirations for the service and we can begin to deliver these using the additional income generated. We will increase the number of officers focussed on delivering the services for tenants and support volunteer site representatives. Through them we will improve maintenance repair services, improve our guidance and educational resources and support more people to benefit from growing food.
The rent uplift will impact on people with low income who are not eligible for a discount	We have extended the reach of the 50% discount to include those that are in receipt of Universal or Pension Credit. This is expected to benefit one in five of all our tenants. Tenants

	will have the option to pay by Direct Debit on a quarterly or monthly basis to help spread the cost.
There are alternatives to increasing rent – [for example] bringing more overgrown plots in to use.	We will continue to clear overgrown plots. However the additional rental income achievable is not significant.
Any income generated should only go to the allotments service and not support other council services.	The cost of delivering allotment services to the Council is currently higher than the income generated from allotment rents.
There should not be a separate water charge	We feel it is important that it is clear to tenants which element of their payment relates to water, particularly as supply costs are generally increasing and when some allotments sites do not have a water supply.

Full Council undertook its budget setting meeting in February 2022 which agreed an additional £55K budget saving income target for allotments, the budget proposal was subject to public consultation. Part of the proposed allotment rent increase is to cover this income requirement.

We have further consulted the public in particular tenants and those on the waiting list concerning rent increase, and Additional Charges, changes to Tenancy Agreement and creation of the Rules, this consultation took place December 2023 – January 2024. Proposed changes to Bristol Allotment Rent and Tenancy Agreement.

The Allotments and Food Growing Strategy is now part of the Parks and Green Space Strategy and is subject to a separate consultation during December 2023 and January 2024 Parks and Green Spaces Strategy. This outlines the need and aims behind the intention to increase rents and make changes to the Tenancy Agreement and Rules.

## 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

No further engagement is required. However the Committee Report sets out that a further engagement process with tenants and others will help determine changes to the allotment tenancy agreement, tenancy rules and administration (not rent or water service charges) fees with a recommendation brought to a future Committee for approval.

## Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above, and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

### 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

#### GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

The consultation on proposed changes to allotment rents and other fees and charges, and some changes to activities permitted on allotments under the allotment tenancy agreement process that took place between 11 December 2023 and 31 January 2024, has demonstrated that the rate at which fees were proposed to be set is not

supported – by 78% of all respondents. Although respondents suggested a number of ways in which the proposals might affect particular groups and communities, in general the views of people holding particular protected characteristics were reflective of the overall consultation responses.

- 80% - Percentage of those who disagree with the proposal who live within the 10% most deprived communities in Bristol.
- 77% - Percentage of those who disagree with the proposal who are aged 24 and under.
- 76% - Percentage of those who disagree with the proposal who are aged between 55 and 64
- 71% - Percentage of those who disagree with the proposal who are aged between 65 and 74
- 79% - Percentage of those who disagree with the proposal who are disabled.
- 81% - Percentage of those who disagree with the proposal who are Black, Black British, Caribbean or African
- 82% - Percentage of those who disagree with the proposal who are Asian or Asian British.
- 83% - Percentage of those who disagree with the proposal who are from mixed or multiple ethnic groups.
- 77% - Percentage of those who disagree with the proposal who are female.
- 73% - Percentage of those who disagree with the proposal who are pregnant who have recently given birth.
- 74% - Percentage of those who disagree with the proposal who are carers.

#### PROTECTED CHARACTERISTICS

<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We have not identified any significant disproportionate impact, however some people responding to the consultation pointed out that allotments provide activities to do with children. 4 respondents said that the proposals would have a negative impact on younger people, due to younger people having a lower income than older age groups, making the rent increase have more of a negative effect.
Mitigations:	See general mitigations above
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We have not identified any significant disproportionate impact, however 147 consultation respondents said that the proposals would have a negative impact on older people. The reasons given included: <ul style="list-style-type: none"> <li>– Reduced income due to no longer working and being on a pension means the rent increase has more of a negative effect on older people</li> <li>– Negative effect on mental and physical health of no longer being able to work on their allotment due to the increased rent.</li> </ul>
Mitigations:	See general mitigations above
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Impacts may be related to ability to pay as a higher proportion of disabled people are reliant on benefits or on a lower income. 148 consultation respondents said that the proposals could have a negative impact on Disabled people for reasons including: <ul style="list-style-type: none"> <li>– Lower income due to Disability means the rent increase has more of a negative effect</li> <li>– Required standards will be harder to meet due to disability</li> <li>– A ban on temporary helpers/co-workers will make it difficult for Disabled people to maintain their allotments to the required standard</li> <li>– A negative effect of the amount of changes in rules, restrictions, and financial burden on people with mental health disabilities – increase in anxiety, worsening conditions etc.</li> <li>– Removing waste from an allotment plot requires using your own vehicle, which some impairments prevent</li> <li>– Disabled people may need sheds/shelters to rest whilst working on their allotments.</li> </ul>
Mitigations:	We are offering a 50% discount for those in receipt of Universal Credit or Pension Credit which are means tested benefits. We will advertise the existence of accessible raised bed (plots) and intend have a separate waiting list from the main site so that people who identify as a Disabled

	<p>person with accessibility requirements do not need to queue on the main waiting list for a plot which would be unsuitable for them. In order that accessible plots are reserved for those who need them. The strategy envisages expanding provision from 37 to circa 50 plots.</p> <p>On a few sites, some Plots are provided as fully accessible raised beds with hard surface surrounds and with adjacent car parking. These plots will be reserved for those who identify as a Disabled people with accessibility requirements, that may require such plots. Where an applicant desires an accessible plot, they can apply solely on the separate “sub-site” Accessible Plot Waiting List.</p>
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We have not identified any significant disproportionate impact, however 34 consultation respondents said that the proposals could have a negative impact on women, including because the gender pay gap means the increase in fees will have more of a negative effect on women.
Mitigations:	See general mitigations above
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We have not identified any significant disproportionate impact, however 11 consultation respondents said that the proposals could have a negative impact on people in the LGBT+ community because allotment communities the respondents belong to are welcoming to LGBT+ people and are seen as a safe space.
Mitigations:	See general mitigations above
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We have not identified any significant disproportionate impact, however 31 consultation respondents said that the proposals could have a negative impact due to pregnancy and maternity, due to increased fees
Mitigations:	See general mitigations above
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Impacts may be related to ability to pay as a higher proportion of ethnic minority groups live in low-income households. 16 respondents indicated that the proposals could negatively impact people from minoritized communities, potentially exacerbating the existing under-representation in allotments.
Mitigations:	While we do not plan to offer concessionary rates based on ethnicity, the general measures we have outlined, such as discounts for low-income households, will benefit some communities.
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We have not identified any significant disproportionate impact, however 5 consultation respondents said that the proposals could have a negative impact on people due to their religion/faith, including because nature worship and sharing activities such as growing and harvesting amongst family and friends may be part of community religion/faith, which would be impacted by the proposed fee increase.
Mitigations:	See general mitigations above
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>OTHER RELEVANT CHARACTERISTICS</b>	
<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<p>Quality of Life Survey 2022-23</p> <ul style="list-style-type: none"> <li>In Bristol 17.5% of residents who find it difficult to manage financially live in the 10% most deprived areas in England, Bristol average is 10.2%.</li> </ul>

	<ul style="list-style-type: none"> <li>• 3.7% of households have experienced severe food insecurity, rising to 7.9% in the 10% to 20% decline of deprivation in the city</li> <li>• 8.1% of households have experienced moderate to severe food insecurity, rising to 16.1 in the most 10% deprived areas of the city</li> </ul>
Mitigations:	<p>The increase in rent could impact on allotment tenants who are struggling with financial hardship. To address this, the following personal circumstances concessions will be in place:</p> <p>The proposal is to expand the eligibility to all aspects of Universal Credit together with Pension Credit.</p> <p>50% discount is offered to tenants who are in receipt of Universal Credit, Pension Credit, Housing Benefit or Council Tax reduction (latter not applicable to students and single occupancy discounts) (if they receive the latter two, they are likely to be on Universal Credit).</p> <p>We currently offer annual Direct Debit, to assist with personal budgeting we will expand this to include quarterly or monthly payments.</p> <p>The most popular sized plot 75-149m2 will cost £1.71 per week before discounts applied as applicable.</p>
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We have not identified any significant disproportionate impact, however 13 consultation respondents said that the proposals could have a negative impact on carers due to increased fees, acknowledging that allotments have a role to play in promoting mental health and wellbeing for carers
Mitigations:	See general mitigations above
<b>Other groups</b> [Please add additional rows below to detail the impact for any other relevant groups as appropriate e.g. asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
Potential impacts:	Consultation responses included comments that refugees may not be able to access the benefits required to be eligible for the low-income discount, and that there may be negative sentiment due to the expansion of the low-income discount, which could impact refugees.
Mitigations:	See general mitigations including promotion/support of collective growing groups, and ongoing communications

### 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our [Public Sector Equality Duty](#) to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

These are given in the mitigations above.

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

<b>Summary of significant negative impacts and how they can be mitigated or justified:</b>
Our analysis has highlighted existing disparities in the accessibility and affordability of allotments for service users. Whilst the proposed mitigations will help to address these issues, decision-makers should have due regard for the identified potential equality impacts. We think that the proposal is justified on the basis that it is necessary and proportionate for the future financial stability of the service, and to allow us to cater for those on low incomes to grow their own healthy food helped by receiving a 50% discount on plot rental if they receive the prescribed benefits.
<b>Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:</b>
The advertising and separate waiting list for accessible plots will allow more Disabled people to engage with growing their own food or to take part in collective food growing group activities. Promotion of existing collective growing groups and supporting new collective groups to set up, will help provide more low-cost food growing opportunities for individuals without the commitment of an allotment tenancy. The proposed rent increase will allow us to provide a good quality allotment service for our existing tenants and future generations.

## 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
To improve data collection of demographics and equalities data through scheduled surveys likely every 3-5 years and requesting upon take up of tenancy.	Lorraine Smith	As new Tenancy agreements are rolled out
To engage further concerning the Tenancy Agreement, Rules and Additional Charges	Lorraine Smith	As determined by the Council's Administration
Implementation related to; accessible plots, additional benefits eligibility and monthly Direct Debit	Lorraine Smith	Once proposals are approved.

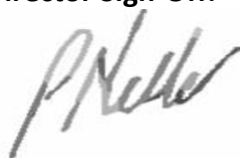
## 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

We will have better understanding of the equalities issues and needs of our tenants through improved data. We will receive feed-back from our tenants directly and through the Bristol Allotments Forum.
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## Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director<sup>1</sup>.

<b>Equality and Inclusion Team Review:</b> <i>Reviewed by Equality and Inclusion Team</i>	<b>Director Sign-Off:</b> 
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<sup>1</sup> Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

	Patsy Mellor, Director Management of Place
Date: 19/7/2024	Date: 12/09/2024