

Equality Impact Assessment (EqIA) – Draft Local Plan July 2014

All public authorities are required by the Equalities Act 2010 to specifically consider the likely impact of their policy, procedure or practice on certain groups in the society. These groups (sometimes referred to as equality stands) are defined by the 2010 Act as :

- Age
- Disability
- Gender (sex)
- Race
- Sexual Orientation
- Religion or belief
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity

It is our responsibility to ensure that our policies, procedures and service delivery do not discriminate, including indirectly, on any sector of society. Council policies, procedures and service delivery may have differential impacts on certain groups, and these will be highlighted in the EqIA screening. Likely differential impacts must be highlighted, and described, as some may be positive. Where likely significant adverse differential impacts are identified, consideration should be given to opportunities to reduce or mitigate this through a full equalities impact assessment.

Check duties of a local planning authority under the requirements of the Children's Act

Equality Impact Assessment Screening

<p>Section</p> <p>Planning Services</p>	<p>Officer responsible for the screening/scoping</p> <p>Sarah-Jane Willmott – Central Support Team Leader</p>	
<p>Name of Policy to be assessed</p> <p>Draft Local Plan</p>	<p>Date of Assessment</p> <p>04/07/14</p>	<p>Is this a proposed new or existing policy/procedure/practice?</p> <p>The Draft Local Plan will consist of new policies</p>
<p>1. Briefly describe the aims, objectives and purpose of the policy/procedure/practice?</p>	<p>The draft Local Plan is concerned with the development of and uses of land within the borough. It guides development across the borough over the plan period to 2031 and addresses fundamental issues such as economic growth, the provision of housing and the preservation and enhancement of the natural and built environment. As such, it will have an impact on everyone who lives, works, plays, visits or travels in the borough.</p> <p>The current Local Plan dates from 2003 and we currently use saved policies from this to help make decisions. We are working on its replacement, which will be in two parts.</p> <p>The draft Local Plan Strategy and Sites (LPSS) will set the strategic policies that will determine how much and where development of different types is built. It will also include some cross-cutting policies.</p> <p>The Draft Local Plan asks for comment to help inform the policies for the Adopted Local Plan.</p>	
<p>2. Are there any associated or specific objectives of the policy/procedure/practice? Please explain.</p>	<p>The objective / aim of the draft Local Plan is to set out the framework under which decisions on development will be decided over the next 15-20 years. The draft Local Plan Strategy and Sites will cover the period 2015/16-2030/31.</p> <p>If we do not write and adopt a new Local Plan, we will lose the ability to control and plan for change and growth. We will not have anything against which we can assess applications for. Therefore, if we reject a development without good reason, most developers will successfully appeal the decision.</p> <p>The draft Local Plan will include policies, proposals and site allocations to deliver a vision for the future of the borough over the plan period up to 2031.</p>	

	<p>The objective / aim of the Draft Local Plan is to gather information on the views of the local community about the key issues that need addressing in the borough, potential policy options and development sites.</p> <p>The whole plan will be subject to independent examination by a government inspector.</p>
<p>3. Who is intended to benefit from this policy and in what way?</p>	<p>The Draft Local Plan will benefit all those who live, work, run businesses, play, visit or travel in the borough, by providing policies and sites allocated for certain land uses. This will help to increase certainty for residents, businesses, and others about how decisions are made and what they are based on.</p> <p>All people and businesses who depend on the borough's economy will benefit by having a clear idea of what type of growth will take place in the borough and where it will be over the plan period to 2031. The draft Local Plan seeks to bring forward sustainable growth in housing, employment and other uses, and uses, and improve transport options, which will bring benefits to all the borough's communities.</p> <p>Policies seek to protect and enhance the built and natural environments which will benefit everyone who lives in, works in, has business in or visits the borough.</p> <p>The draft Local Plan policies seek to increase the number of homes being built, and will guide the location of new housing constructed, specifically to benefit those seeking homes.</p>
<p>4. What outcomes are wanted from this policy / procedures / practice?</p>	<p>We need to have a new and up to date Local Plan to guide development in a coherent way. This will help us to co-ordinate infrastructure such as schools, public transport, and playgrounds, that will benefit all communities affected by development.</p> <p>This will help to deliver the Council's vision for the borough, as one that seeks opportunity and choice for future generations, while retaining a pride in its local heritage.</p> <p>An understanding of the opinions of our community, including residents, businesses and other organisations about the policies, proposals and site allocations.</p> <p>We need the views of people who will be affected by the plan in order to create a spatial vision for the borough. We will then formulate objectives and policies that will help us to ensure that the vision for the future of the borough will be delivered.</p>
<p>5. What factors / forces could</p>	<p>A wide engagement across a representative cross section of the borough will help to ensure that the</p>

<p>contribute / detract from the outcomes?</p>	<p>policies in the draft Local Plan will reflect the needs of people who live and work in the borough. In our consultation, we will take particular care to ensure that we involve a broad and representative cross-section of the borough's communities. We will specifically seek to involve younger people and others who do not often get involved in Council consultations using a variety of formats.</p> <p>If responses are limited to the borough's most vocal groups, there is a danger that the draft Local Plan will unfairly favour those groups over the needs of other communities in the borough and will disenfranchise those who do not belong to such groups.</p>
<p>6. Who are the main stakeholders in relation to the policy?</p>	<p>Members of the borough's communities (residents, workers, businesses), and visitors to the borough will ultimately be affected by the draft Local Plan that this consultation helps to inform.</p> <p>Other stakeholders are –</p> <p>Parish councils. Owners of land who may want to develop their land or to protect their land from development. Developers wishing to bring forward development in the borough. Neighbourhood, local and national pressure groups. Local resident and amenity groups Statutory organisations</p>
<p>7. Who implements the policy, and who is responsible for the policy?</p>	<p>Planning Services implements the policies and is responsible for them</p>
<p>8. Are there concerns that the policy <u>could</u> have a differential impact due to age?</p>	<p>No</p>
<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>The draft Local Plan Strategy and Sites will specifically seek to improve the lives of all those identified in Section 3 above. It will need to include policies to ensure that a wide range of housing is developed. This will include housing for certain groups whose needs may otherwise not be met by the market. Some of these groups disproportionately concentrated in certain age groups. These age groups may include elderly people who need care homes or retirement housing, and young people who may need affordable housing if they cannot enter the housing market.</p>

	<p>The provision of an updated affordable housing policy to reflect up to date evidence may well disproportionately favour younger homebuyers and renters. The facilitation of market housing through land allocation will alleviate housing supply problems and potentially slow down increases in the cost of housing. This will also benefit first time buyers who tend to be young.</p> <p>Any policies concerning student housing, and any sites allocated for student housing are likely to differentially impact on younger people who are the majority of students.</p> <p>Transport policies in the draft Local Plan will seek to improve sustainable transport modes like buses, trains and cycling. Policies will aim to ensure that new housing is focussed in areas with good public transport and access to services. This will generally be more positive for people who are too young to drive (under 17) as this group is more likely to rely on sustainable transport.</p>
<p>9. Are there concerns that the policy <u>could</u> have a differential impact due to disability?</p>	<p>No</p>
<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>There is a requirement that development must be sustainable required by the NPPF.</p> <p>‘The purpose of the planning system is to contribute to sustainable development.’ (NPPF, para 6).</p> <p>Policies regarding development will seek to site growth in areas that are accessible by public transport, or can be made so, and will also seek to ensure that new homes and commercial buildings are adaptable and can be used by people of a variety of ability. Transport policies will seek to improve access to public transport which will benefit some disabled people who may be unable to drive.</p> <p>Sites and improvements to public spaces will need to be designed to comply with the Disability Discrimination Act 1995.</p>
<p>10. Are there concerns that the policy <u>could</u> have a differential impact due to gender?</p>	<p>No</p>
<p>What existing evidence (either</p>	<p>Policies in the draft Local Plan will have an impact upon everyone who lives in, works in, has business in,</p>

<p>presumed or otherwise) do you have for this?</p>	<p>travels through or visits the borough and we expect this to impact on people of different genders equally.</p>
<p>11. Are there concerns that the policy <u>could</u> have a differential impact on racial groups?</p>	<p>No</p>
<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>The draft Local Plan policies, proposals and allocations will aim to ensure that sites are available to provide sufficient housing to meet a significant proportion of housing needs of all groups within the borough.</p> <p>Travellers are a specific race protected under the Race Relations Act. The Traveller accommodation needs assessment highlights a need for us to adopt a policy that specifically seeks to bring forward additional pitches, both public and private for Travellers. Planning to providing sufficient pitches is a statutory requirement under guidance that is separate from the NPPF .</p> <p>There is a backlog of unmet accommodation needs for Travellers. The number of unauthorised sites and temporary planning permissions granted planning permission or allowed at appeal reflects this.</p> <p>The provision of permanent allocated and non-allocated authorised sites will ultimately result in fewer unauthorised developments and encampments. This will help to reduce tensions between the settled community living in bricks and mortar housing and Travellers occupying unauthorised sites.</p> <p>We have also prepared evidence to demonstrate how many bricks and mortar homes are likely to be needed in the plan period. We will be required by the independent examiner to show that we are planning to accommodate as much as we reasonably can on our objectively assessed need.</p> <p>Therefore, with specific policies to significantly increase the number of bricks and mortar homes and pitches, the impact of policies and site allocations in the plan as a whole should not differentially impact, although housing individual policies are likely to.</p>
<p>12. Are there concerns that the policy <u>could</u> have a differential impact due to sexual orientation?</p>	<p>No</p>

<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>The policies in the draft Local Plan will have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the borough. There is no evidence that there will be a differential impact based on sexual orientation.</p> <p>The draft Local Plan is for the equal benefit of all those mentioned in Section 3 above.</p>
<p>13. Are there concerns that the policy <u>could</u> have a differential impact due to religion or belief?</p>	<p>No</p>
<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>The draft Local Plan may allocate land for cemeteries and crematorium. Some religions require separate burial areas. The catchment of the borough's cemetery service extends beyond the borough, so the cemetery /crematorium needs of communities outside the borough will need to be considered.</p> <p>The draft Local Plan will seek to bring forward enough burial space to meet the needs of the whole population of the burial catchment area so no individual group will be disadvantaged.</p>
<p>14. Are there concerns that the policy <u>could</u> have a differential impact due to gender reassignment?</p>	<p>No</p>
<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>The policies in the draft Local Plan will have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the borough. There is no evidence that there will be a differential impact based on gender reassignment.</p> <p>The draft Local Plan Strategy and Sites is for the equal benefit of all those mentioned in Section 3 above.</p>
<p>15. Are there concerns that the policy <u>could</u> have a differential impact due to marriage and civil partnership?</p>	<p>No</p>

<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>The policies in the draft Local Plan will have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the borough. There is no evidence that there will be a differential impact based on marriage and civil partnership.</p> <p>The draft Local Plan Strategy and Site is for the equal benefit of all those mentioned in Section 3 above.</p>
<p>16. Are there concerns that the policy <u>could</u> have a differential impact due to pregnancy and maternity?</p>	<p>No</p>
<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>The policies in the draft Local Plan will have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the borough. There is no evidence that there will be a differential impact based on pregnancy and maternity.</p> <p>The draft Local Plan Strategy and Site is for the equal benefit of all those mentioned in Section 3 above.</p>
<p>17. Are there concerns that the policy <u>could</u> have a differential impact on former offenders? (considering the Rehabilitation of Offenders Act 1974)</p>	<p>No</p>
<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>Former offenders may frequently live in hostel accommodation, particularly in early days after release. The draft Local Plan Strategy and Sites will seek to ensure that sufficient suitable housing is provided for all population groups, including specialist housing such as hostels.</p>
<p>18. Are there concerns that the policy <u>could</u> have a differential impact on those with dependants/caring responsibilities?</p>	<p>No</p>

<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>The policies in the draft Local Plan will have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the borough. There is no evidence that there will be a differential impact based on those with dependants/caring responsibilities.</p> <p>The draft Local Plan Strategy and Site is for the equal benefit of all those mentioned in Section 3 above.</p>	
<p>19. Could the differential impact identified in 8-18 amount to there being the potential for adverse impact in this policy/procedure/practice?</p>	<p>No</p>	<p>No. Where a differential needs are identified, such as the need to provide suitable housing for all, we will ensure that draft Local Plan policies specifically address these different needs so that the impact of the plan as whole for all is equal.</p>
<p>20. Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group?</p> <p>Or any other reason?</p>	<p>N/A</p>	
<p>21. Is there any concern that there are unmet needs in relation to any of the above groups?</p>	<p>No</p>	<p>We do not believe there are any unmet needs in relation to spatial planning for the above groups that we are not planning to meet. However the draft Local Plan consultation will provide an opportunity for members of those groups to put forward their views on this, to ensure that what is needed is delivered.</p>
<p>22. Does differential impact or unmet need cut across the equality strands (e.g. elder BME groups)?</p>	<p>No</p>	<p>There are some differential impacts, as we may need to develop different policies relating to provision of housing for different groups. However, although individual policies, proposals and site allocations in the draft Local Plan Strategy and Sites are likely to impact differentially on various age groups and potentially on different ethnic groups, the plan as a whole will not have a differential impact , as it will seek to ensure that we make provision for housing for all communities.</p>
<p>23. If yes, should the full EIA be conducted jointly with another service area/contractor/partner/agency?</p>	<p>N/A</p>	

<p>24. Is there a missed opportunity to improve your business in relation to any of the policies, procedures or practices to promote racial, gender, disability, age, sexual orientation, religion or belief equality?</p>	<p>No</p>	<p>We will need to engage fully with all the groups representing people with the protected characteristics that are active in the borough, including Guildford Access Group (who have specifically asked to be involved in the process).</p> <p>It is our intention that our consultation on the Draft Local Plan document will pro-actively seek to engage those who do not usually respond to our consultations, including those with the above protected characteristics.</p>						
<p>25. Should the policy proceed to a full equality impact assessment?</p>	<p>Yes</p>	<p>Impact on each group to score : 0 – no relevance, no adverse impact, or positive impact 1 – extremely low relevance and adverse impact 2 – relatively low relevance and adverse impact 3 – medium relevance and adverse impact 4 - relatively high relevance and adverse impact</p> <p>Total Impact Score : 0-8 points low adverse impact, no need for full EIA 9-17 points medium adverse impact, full EIA required 18-24 points high adverse impact, full EIA required</p>						
		<p>Age</p>	<p>Disability</p>	<p>Gender (sex)</p>	<p>Race</p>	<p>Sexual Orientation</p>	<p>Religion or Belief</p>	
		<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	
		<p>Gender Reassignment</p>		<p>Marriage and Civil Partnership</p>		<p>Pregnancy and Maternity</p>		<p>Total Impact</p>
<p>24. If No, are there any changes required to the policy to improve it around the equality agenda?</p>	<p>No</p>	<p>Not yet. Provided we pursue suitable policy options any negative impact will be avoided.</p>						

Signed
(completing officer)

Flo Churchill

Date

1 July 2014

Signed
(Executive Head of Service)

Chris Mansfield

Date

1 July 2014

Countersigned
(member of Equality Action Group)

Sarah-Jane Willmott

Date

1 July 2014