



## **Submission Local Plan: Development Management Policies**

### **Equality Impact Assessment**

**April 2022**

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## Equality Impact Assessment

The purpose of an assessment is to understand the impact of the Council's activities\* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(\*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

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| Name of person completing the assessment | Riaan van Eeden | Date of assessment | 19/04/2022<br><br>[Previous versions of draft Local Plan Development Management Policies (LPDMP) screening equality impact assessments:<br><ul style="list-style-type: none"> <li>• 10/09/2021 (Reg 19 stage)</li> <li>• 14/02/2020 (Reg 18 stage)]</li> </ul> |
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| Name of the proposed activity being assessed | Draft Local Plan: development management policies (Submission stage) | Is this a new or existing activity? | The draft LPDMP consists of new policies. The current stage is submission to the Secretary of State for Examination. |
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| Who will implement the activity and who will be responsible for it? | Guildford Borough Council, appeal inspectors and the Secretary of State (the planning decision makers) are responsible for implementing the Plan's policies when determining planning applications. If found sound by an independent Planning Inspector and adopted by Full Council, the Plan's policies will carry full weight and form part of the Council's Development Plan. |
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### 1. Determining the relevance to equality

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| What are the aims, objectives and purpose of the activity? | <p>The LPDMP will provide detailed development management policies that will be used when determining planning applications. When adopted, it will form Part 2 of the Guildford Local Plan, alongside the 'Strategy and Sites' (LPSS) document (Part 1) adopted in April 2019.</p> <p>The draft LPDMP sets out proposed development management policies that will help manage development across Guildford borough.</p> <p>The LPDMP's objectives are carried forward from the LPSS strategic objectives. These include a range of social objectives, such as: to deliver sufficient sustainable development that meets all identified needs; to improve opportunities for all residents in the borough to access suitable housing, employment, training, education, open space, leisure, community and health facilities; and to ensure that all development is of high quality design and enables people to live safe healthy and active lifestyles, along with various environmental, economic and infrastructure objectives.</p> |
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| Is this a major activity that significantly affects how services or functions are delivered? | No. | Who will benefit from this activity and how? | The LPDMP will benefit all those who live or work in, or visit the borough, by providing policies that promote more sustainable and inclusive development with higher design standards, which are responsive to the Climate emergency declared by the Council. The plan will help to increase certainty for residents, businesses, and others about how planning decisions are made and what they are based on. |
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| Does it relate to a function that has been identified as being important to people with particular protected characteristics? | No. | Who are the stakeholders? Does the activity affect employees, service users or the wider community? | Main stakeholders include: - <ul style="list-style-type: none"> <li>• Statutory organisations</li> <li>• Local residents and amenity groups</li> <li>• Neighbourhood, local and national pressure groups</li> <li>• Parish councils</li> <li>• Developers, landowners</li> </ul> |
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**Based on the above information, is the activity relevant to equality?**

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| <b>Yes – continue to section 2</b>  | Yes |
| <b>No – please record your reasons why the activity is not relevant to equality</b> |     |

| 2. Is the proposed activity accessible for all the protected groups listed below?<br>(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community or protected groups. How might one or more groups be excluded because of the activity?) |     |    |  |
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| Protected groups  | Yes | No | Evidence   |
| Disability  | Yes |    | The Plan is available online and in print, and can be made available in a different format, Braille, large print or audio, to aid accessibility. |
| Race  | Yes |    | The Plan is available online and in print, and can be made available in a different language to aid accessibility.                               |
| Gender  | Yes |    | N/A  |
| Sexual orientation  | Yes |    | N/A  |

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| Age                            | Yes |  | The Plan is available online and in print, and can be made available in a different format, Braille, large print or audio, to aid accessibility. |
| Religion or belief             | Yes |  | N/A  |
| Transgender or transsexual     | Yes |  | N/A  |
| Marriage and civil partnership | Yes |  | N/A  |
| Pregnancy or maternity         | Yes |  | N/A  |

| 3. Is it likely the proposed activity will have a negative impact on one or more protected groups? |     |    |  |
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| Protected groups   | Yes | No | Evidence   |
| Disability   |     | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact in relation to those who have a disability.</p> <p>The Regulation 19 consultation has not identified any further opportunities to promote greater equality / address possible differential impacts in relation to those who have a disability in the borough linked to the proposed policies.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP (particularly those relating to housing, design, and infrastructure). For example, in relation to those with disabilities, Policy ID6(10) sets an expectation that new open space, is safe and secure for all members of the community and that its design and management should promote social inclusivity (see also LPSS policy D1).</p> <p>In addition, the draft LPDMP includes policy in line with the LPSS Policy H1 (and the NPPF para 62) such as supporting housing extensions and alterations (Policy H5) which allows homes to be adapted to respond to changing needs, which would include the needs of those with disabilities.</p> <p>The NPPF (para 112) indicates that applications for development should address the needs of people with disabilities and reduced mobility in relation to all modes of transport. In this context, guidance on car and cycle parking for disabled drivers / people with mobility impairments has been considered and included in developing proposed parking standards in the LPDMP / draft Parking SPD (which has been developed alongside the LPDMP). The delivery of a higher-quality comprehensive Guildford borough cycle network is expected to make this network more accessible to those with non-standard cycles.</p> |

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| Race               |  | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact in relation to racial groups. Travellers are a specific race protected under the Race Relations Act.</p> <p>The Council has produced a Traveller Accommodation Assessment (2017) and the LPSS prioritised addressing the accommodation needs of Travellers in its policies (see for example Policy H1(7), H3 and relevant site allocation Policies). The Council's Annual Monitoring Report (AMR) provides an indication of performance in meeting needs related to the Local Plan. Further, design requirements for pitches and plots are included in the relevant site allocation policies in the LPSS.</p> <p>The Regulation 19 consultation did reflect a representation relating to a perceived need for further policy including criteria for the design of traveller pitches and travelling show people plots. This was considered carefully, however the view was taken that this concern is sufficiently addressed by the LPSS policies.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP. The Plan relates to policies concerning new development, design, protection of the environment, and to the development or improvement of infrastructure that would benefit all racial groups equally.</p> |
| Gender             |  | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact on the basis of gender.</p> <p>The Regulation 19 consultation has not identified any further opportunities to promote greater equality / address possible differential impacts in relation to gender.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP. The Sustainability Appraisal Scoping Report January 2020 identified that deficiencies in open space provision may have a disproportionate effect on certain groups, i.e. women who are lone parents and families with children under 5. The Council through its DM policies aims to promote access to safe, inclusive, and accessible, open spaces, in particular for women and children.</p>   |
| Sexual orientation |  | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact on the basis of sexual orientation.</p> <p>The Regulation 19 consultation has not identified any further opportunities to promote greater equality /</p>   |

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|     |  |    | <p>address possible differential impacts on grounds of sexual orientation.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP. The Plan relates to policies concerning new development, design, protection of the environment, and to the development or improvement of infrastructure that would benefit all groups equally, regardless of their sexual orientation.</p>  |
| Age |  | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact on the basis of age.</p> <p>The Regulation 19 consultation has not identified any further opportunities to promote greater equality / address possible differential impacts on the grounds of age.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP. In relation to considerations around age, an example of this is Policy H5 which sets out criteria for residential annexes, which will enable families of different generations to live together and help address the cost of care in later life.</p> <p>The Plan also includes Policy H8: First Homes, which seeks to provide increased affordable housing opportunities for first time buyers, often in younger adult age groups who face challenges in terms of housing affordability in Guildford borough.</p> <p>Further, open space including play space is particularly important for the physical and cognitive development of children. Apart from protecting existing open space (Policy ID5) and setting standards for the provision of open space (Policy ID6), the LPDMP sets an expectation that new open space, is safe and secure for all members of the community and that its design and management should promote social inclusivity (see Policy ID6(10), as well as LPSS Policy D1).</p> <p>In terms of design, the plan seeks to address health impacts in the light of climate change and increases in extreme weather events, including the potential for overheating of buildings. Buildings that are either too hot or too cold can have a disproportionate physical and mental health impact on vulnerable people, including older individuals. The plan is responsive to these considerations – see for example, Policy D13(2).</p> <p>The LPDMP also seeks to ensure accessible community facilities (see Policy ID8) which is particularly important in terms of facilities serving the youth (such as new</p> |

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|                                |  |    | schools, which are allocated in the LPSS) and older persons, particularly those with limited mobility and/or reliant on public transport.   |
| Religion or belief             |  | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact on the basis of religion or belief.</p> <p>The Regulation 19 consultation has not identified any further opportunities to promote greater equality / address possible differential impacts on grounds of religion or belief.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP. An example of this is Policy ID8: Community Facilities (which includes places of worship) which reflects provisions supporting accessible community facility development along with protections to ensure retention. This may have a positive impact in relation to religious groups who use these facilities.</p> |
| Transgender or transsexual     |  | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact on transgender or transsexual people.</p> <p>The Regulation 19 consultation has not identified any further opportunities to promote greater equality / address possible differential impacts on transgender or transsexual groups.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP. The Plan relates to policies concerning new development, design, protection of the environment, and to the development or improvement of infrastructure that would benefit all groups equally, including those with protected characteristics.</p>   |
| Marriage and civil partnership |  | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact on marriage or civil partnership status.</p> <p>The Regulation 19 consultation has not identified any further opportunities to promote greater equality / address possible differential impacts on grounds of marriage or civil partnership.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP. The Plan relates to policies concerning new development, design, protection of the environment, and to the development or improvement of infrastructure that would benefit all groups equally, regardless of their marital or civil partnership status.</p>  |

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| Pregnancy or maternity |  | No | <p>The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact on those who are pregnant or on maternity.</p> <p>The Regulation 19 consultation has not identified any further opportunities to promote greater equality / address possible differential impacts on those who are pregnant or on maternity.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of proposed policies across the range of topics in the draft LPDMP. The Plan does support the development and retention of community facilities which could include childcare facilities, which would benefit people who are pregnant and/or caring for young children.</p> |
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4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? (*Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an adverse impact? Is an action plan required to reduce any actual or potential adverse impact?*)

No negative impacts have been identified. Measures have sought to be included during the plan-making process that could promote positive impacts. In this context, it is not considered that an action plan is required.

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

The Plan policies, feedback from relevant public consultations at Regulation 18 and Regulation 19 stages, SA scoping report, and previous EqIA screenings conducted at various points in the plan-making process demonstrating ongoing consideration of the Council's obligations in terms of the Public Sector Equality Duty.

6. Has any consultation been carried out (e.g. with employees, service users or the wider community)? Please provide details

Yes. During the plan making process public consultation took place - the LPDMP was subject to two consultations required by the Regulations. The Council undertook an Issues, Options and Preferred Option (Reg 18) consultation from 3 Jun 2020 to 22 Jul 2020, followed by a (Reg 19) consultation on the proposed Submission Local Plan from 7 Jan 2022 to 18 Feb 2022. This was conducted in line with the Council's Statement of Community Involvement (2020). Further informal consultations were held including with prescribed bodies during the preparation of the plan. The process followed is described in detail in the LPDMP Consultation and Duty to Cooperate Statement.



7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

None identified.

8. Conclusion of Equality Impact Assessment - please summarise your findings

The Council considers that the submission, toward adoption of the proposed LPDMP policies will not have a negative impact on those with protected characteristics, neither does it reflect the potential for discrimination. The Council has been mindful of its obligations in terms of the Public Sector Equality Duty throughout the plan-making process. The opportunity to foster greater equality and positive impacts for protected groups has been sought and incorporated within policies where appropriate. In this light, it is considered that the policies will lead to a betterment for protected groups where this is possible including in relation to elements of housing development, design, open space provision, protection of the environment and development and/or retention of infrastructure such as community facilities, the cycle network, and parking provision.

**Name of person completing assessment:** Riaan van Eeden

**Date:** 19/04/22

**Job title:** Senior Planning Officer

**Signature:** *Riaan van Eeden*

**Senior manager name:** Stuart Harrison

**Date:** 19/04/22

**Signature:** *S. Harrison*