

Screening Equality Impact Assessment – to identify potential differential impacts on protected groups of any new or changing activities and establish whether a full Equality Impact Assessment is needed.

Service	Planning Services	Officer responsible for the screening/scoping	Riaan van Eeden
Name of the activity to be assessed	Draft Local Plan: development management policies (Regulation 19 consultation stage)	Date of Assessment	10/09/2021 (Draft) Is this a proposed new or existing activity? The draft Local Plan development management policies (LP DMP) consists of new policies. The current stage is consultation on the draft policies.
1. Briefly describe the aims, objectives and purpose of the activity?	<p>The draft LP DMP will provide detailed development management policies that will be used when the Council determines planning applications. When adopted, it will form Part 2 of the Guildford Local Plan, alongside the 'Strategy and Sites' document (Part 1) adopted in April 2019.</p> <p>The draft LP DMP sets out proposed development management policies that will help manage development across Guildford borough.</p>		
2. Are there any associated or specific objectives of the activity? Please explain.	<p>A key objective / aim of the Local Plan process is to gather information on the views of the local community and other stakeholders about the key issues in the borough and the potential policy options, including the Council's preferred option, for addressing the identified planning issues.</p> <p>The plan's objectives are carried forward from the 'Local Plan: strategy and sites' (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>		
3. Who is intended to benefit from this activity and in what way?	<p>The Local Plan will benefit all those who live, work, run businesses, play, visit or travel in the borough, by providing policies that promote more sustainable and inclusive development with higher design standards. The plan will help to increase certainty for residents, businesses, and</p>		

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	others about how planning decisions are made and what they are based on.
<p>4. What outcomes are wanted from this activity?</p>	<p>The Council is seeking to progress its proposed development management policies toward submission. These proposed policies are being engaged upon and the Council is seeking inputs from a broad cross-section of the borough’s communities as well as other stakeholders.</p> <p>Ultimately, the Council will seek development which aligns with the development management policies that are eventually adopted. It is anticipated that this will have a range of positive social, environmental and economic outcomes which will achieve the Local Plan objectives. Sustainability Appraisal (SA) is being undertaken alongside plan preparation. This has appraised the proposed policies against a number of social, economic and environmental objectives. This includes a number of social objectives:</p> <ul style="list-style-type: none"> • To meet housing requirements of the whole community and provide housing of a suitable mix and type • To facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health • To create and maintain safer and more secure communities and improve the quality of where people live and work • To reduce poverty and social exclusion for all sectors of the community • To create and sustain vibrant communities • To improve levels of education and skills in the population overall <p>The SA process enables a greater understanding of whether the proposed policies perform positively against these objectives and highlights opportunities to improve or enhance this during the drafting process.</p>
<p>5. What factors/forces could contribute/detract from the outcomes?</p>	<p>The engagement process provides an opportunity to contribute to the achieving the outcomes and Local Plan objectives.</p>

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6. Who are the main stakeholders in relation to the activity?	Main stakeholders include: - <ul style="list-style-type: none"> • Statutory organisations • Local residents and amenity groups • Neighbourhood, local and national pressure groups • Parish councils • Developers, landowners. 	7. Who implements the activity, and who is responsible for the activity?	The Council (in particular the development management service and planning committee) will be the primary implementers of the policies, using them to assess planning applications.
8. Are there concerns that the activity <u>could</u> have a differential impact on racial groups?	Y	<input type="checkbox"/> N	None.
What existing evidence, local or national, actual or presumed, do you have to support your response?	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact in relation to racial groups.</p> <p>Travellers are a specific race protected under the Race Relations Act. 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.</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 LP DMP. Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact on racial groups. The Council will consider feedback from Regulation 19 consultation including any opportunities that may be identified to address possible differential impacts on racial groups in the borough linked to the proposed policies.</p>		
9. Are there concerns that the activity <u>could</u> have a differential impact on grounds of gender?	Y	<input type="checkbox"/> N	None.
What existing evidence, local or national, actual	The Council considers that the proposed LP DMP policies as a whole are not likely to have a		

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<p>or presumed, do you have to support your response?</p>	<p>differential impact in relation to gender.</p> <p>The Council has been mindful of opportunities to further advance greater equality in the drafting of preferred proposed policies across the range of topics in the draft LP DMP. 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, older persons and persons with disabilities (specifically through SA objective 3. To create and maintain safer and more secure communities and improve the quality of where people live and work).</p> <p>Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact on the grounds of gender. The Council will consider feedback from Regulation 19 consultation including any opportunities that may be identified to address possible differential impacts in relation to gender in the borough linked to the proposed policies.</p>		
<p>10. Are there concerns that the activity <u>could</u> have a differential impact on those who have a disability?</p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>None.</p>
<p>What existing evidence, local or national, actual or presumed, do you have to support your response?</p>	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact in relation to those who have a disability.</p> <p>The NPPF includes reference to addressing the housing needs for different groups in the community. This includes people with disabilities (see paragraph 62). The Local Plan: strategy and sites 2019 (LPSS) has responded to this through its policies including in relation to accessible homes (Policy H1). The draft LP DMP seeks to develop policies in line with these aims as outlined within the LPSS.</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. The LPSS policies regarding development seek to locate growth in areas that are accessible by public</p>		

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	<p>transport, or can be made so, and sustainable transport policies require that new development maximises opportunities for people with disabilities to access all modes of transport. Policies also state that all new development will be designed to meet the needs of all users, including the setting of the building in the wider environment, the location of the building, the gradient of the plot, transport infrastructure and the public realm.</p> <p>Sites and improvements to public spaces will need to be designed to comply with the Disability Discrimination Act 1995.</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 LP DMP (particularly those relating to housing, design and infrastructure). For example, new open spaces, including access arrangements are expected to be safe and secure for all members of the community and new community facilities must be appropriate in design terms, and inclusive to meet the needs of all users (see also LPSS policy D1). Furthermore, 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 LP DMP. 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. The SA Scoping report has identified that an estimated number of autistic adults and adults with learning disability is expected to increase steadily over time in line with population growth. Population growth is expected to be greatest among the over 65 age group and this, coupled with increases in life expectancy, will result in more autistic adults and adults with learning disabilities requiring additional care and support associated with older age (specifically through SA objective 2. To facilitate improved health and well-being of the population, enabling people to stay independent and reducing inequalities in health).</p> <p>Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact on those who have a disability. The Council will consider feedback from Regulation 19 consultation, including any opportunities that may be identified to address possible differential impacts in relation to those who have a disability in the borough linked to the proposed policies.</p>
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<p>11. Are there concerns that the activity <u>could</u> have a differential impact on grounds of sexual orientation?</p>	<p>Y</p>	<p><input type="checkbox"/> N</p>	<p>None.</p>
<p>What existing evidence, local or national, actual or presumed, do you have to support your response?</p>	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact on the 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 LP DMP. Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact on grounds of sexual orientation. The Council will consider feedback from Regulation 19 consultation including any opportunities that may be identified to address possible differential impacts on the grounds of sexual orientation in the borough linked to the proposed policies.</p>		
<p>12. Are there concerns that the activity <u>could</u> have a differential impact on grounds of age?</p>	<p>Y</p>	<p><input type="checkbox"/> N</p>	<p>None.</p>
<p>What existing evidence, local or national, actual or presumed, do you have to support your response?</p>	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact 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 LP DMP. 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. Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact on grounds of age. The Council will consider feedback from Regulation 19 consultation including any opportunities that may be identified to address possible differential impacts on the grounds of age in the borough linked to the proposed policies.</p>		

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<p>13. Are there concerns that the activity <u>could</u> have a differential impact on grounds of religious belief?</p>	<p>Y</p>	<p><input type="checkbox"/> N</p>	<p>None.</p>
<p>What existing evidence, local or national, actual or presumed, do you have to support your response?</p>	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact on the grounds of religious belief.</p> <p>The proposed policy for Community Facilities (which includes places of worship) reflects provisions supporting their development and retention. This may have a positive impact in relation to religious groups who use these facilities.</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 LP DMP. Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact on grounds of religious belief. The Council will consider feedback from Regulation 19 consultation including any opportunities that may be identified to address possible differential impacts on the religious belief in the borough linked to the proposed policies.</p>		
<p>14. Are there concerns that the activity <u>could</u> have a differential impact on those who have caring responsibilities?</p>	<p>Y</p>	<p><input type="checkbox"/> N</p>	<p>None.</p>

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<p>What existing evidence, local or national, actual or presumed, do you have to support your response?</p>	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact on those who have caring responsibilities.</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 LP DMP. Within Policy H5, support (subject to certain criteria) is given for house extensions and alterations, including basement conversions and annexes. This will help those with caring responsibilities adapt their housing so they can support relatives with dependency needs, such as the elderly or those with disabilities, within their own home. Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact on those who have caring responsibilities. The Council will consider feedback from Regulation 19 consultation including any opportunities that may be identified to address possible differential impacts on those who have caring responsibilities in the borough linked to the proposed policies.</p>		
<p>15. Are there concerns that the activity could have a differential impact on grounds of marital status or civil partnership?</p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>None.</p>
<p>What existing evidence, local or national, actual or presumed, do you have to support your response?</p>	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact on the grounds of marital status 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 LP DMP. Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact on grounds of marital status or civil partnership. The Council will consider feedback from public consultation including any opportunities that may be identified to address possible differential impacts on the grounds of marital status or civil partnership in the borough linked to the proposed policies.</p>		

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<p>16. Are there concerns that the activity <u>could</u> have a differential impact due a woman’s pregnancy or maternity?</p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>None.</p>
<p>What existing evidence, local or national, actual or presumed, do you have to support your response?</p>	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact based on pregnancy or 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 LP DMP. Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact due to woman’s pregnancy or maternity. The Council will consider feedback from Regulation 19 consultation including any opportunities that may be identified to address possible differential impacts based on pregnancy or maternity in the borough linked to the proposed policies.</p>		
<p>17. Are there concerns that the activity <u>could</u> have a differential impact due to gender reassignment?</p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>None.</p>
<p>What existing evidence, local or national, actual or presumed, do you have to support your response?</p>	<p>The Council considers that the proposed LP DMP policies as a whole are not likely to have a differential impact based on gender reassignment.</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 LP DMP. Regulation 18 consultation has not highlighted significant concerns with regard to the preferred options in relation to differential impact due to gender reassignment. The Council will consider feedback from Regulation 19 consultation including any opportunities that may be identified to address possible differential impacts based on gender reassignment in the borough linked to the proposed policies.</p>		

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<p>18. Could any differential impact identified in 8-17 amount to there being the potential for adverse impact in this activity?</p>	<p>Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>No. At this stage the Council is of the view that the proposed policies would not hold the potential for adverse impacts from this activity. The Council will however carefully consider responses to the Regulation 19 consultation in relation to potential adverse impacts that may be identified by stakeholders and .</p>
<p>19. Can this adverse impact be justified on the grounds of promoting equality of opportunity for one or more of the protected groups or any other reason?</p>	<p>Y</p>	<p>N</p>	<p>Not applicable.</p>

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<p>20. If the activity is of a strategic nature, could it help to reduce inequalities associated with socio-economic disadvantage?</p>	<p><input checked="" type="checkbox"/> Y</p>	<p>N</p>	<p>The Council has been mindful of opportunities in this regard in the drafting of for the proposed policies and will continue to be so when reviewing Regulation 19 consultation responses.</p> <p>Proposed LP DMP policies, particularly those relating to housing, design and infrastructure may provide a basis for reducing inequalities associated with socio-economic disadvantage and provide an opportunity to plan positively to reduce deprivation and improve social inclusion. A proposed policy has been included making provision for first homes, which seeks to provide access to affordable homes for first time buyers, which is considered can assist in reducing inequality in terms of access to housing. Furthermore, the design and provision of open space to meet all peoples' needs including encouraging the provision of community growing space provides an opportunity to contribute to addressing food insecurity. Additionally, proposed requirements relating to the provision of different types of open space, as well as ensuring that it is safe and accessible for all members of the community provides a basis for ensuring inclusivity in relation to these opportunities.</p> <p>Further opportunities have been sought to strengthen new-build standards to ensure they are designed for a changing climate, are future-proofed for low-carbon heating, designed and constructed to provide for the comfort, health, and wellbeing of current and future occupiers over the lifetime of the development; and deliver high levels of energy efficiency to provide environmental improvements and reduce fuel poverty. This in turn is intended to contribute to wellbeing and involvement in public life, including for those at a socio-economic disadvantage. The promotion of access to social opportunities also extends to proposed policy for community facilities. These aim to ensure that facilities are accessible to all and are not unnecessarily lost.</p>
<p>21. Is there any concern that there are unmet needs in relation to any of the above protected groups?</p>	<p><input checked="" type="checkbox"/> Y</p>	<p><input checked="" type="checkbox"/> N</p>	<p>At this stage no concerns have been identified in relation to unmet needs in relation to the above-mentioned groups. Many of the needs of protected groups have been addressed by the LPSS and proposed LP DMP policies.</p>

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<p>22. Does ‘differential impact’ or ‘unmet need’ cut across one or more of the protected groups (e.g. elder BME groups)?</p>	<p>Y</p>	<p><input type="checkbox"/> N</p>	<p>It is not considered that the proposed policies will have a differential impact, nor that there is an unmet need that cuts across one or more of the protected groups.</p>																																					
<p>23. If yes, should a full EIA, if necessary, be conducted jointly with another service area or contractor or partner or agency?</p>	<p>Y</p>	<p><input type="checkbox"/> N</p>	<p>Not applicable. At this stage, no need is identified to conduct a full EIA.</p>																																					
<p>24. Is there a missed opportunity to improve this activity to meet the general duties placed on public bodies to eliminate unlawful discrimination, to advance equality of opportunity and to promote good relations between people who share protected characteristics and those who do not?</p>	<p>Y</p>	<p><input type="checkbox"/> N</p>	<p>The Council is mindful of the aims of the Public Sector Equality Duty (PSED) (section 149 of the Equality Act 2010) and has given and will continue to give particular thought to how the LP DMP proposed policies are formulated in a manner that advances these aims and does not discriminate, including indirectly, on any sector of society.</p> <p>Regulation 18 consultation has not highlighted significant missed opportunities in this regard. In developing the LP DMP, the Council will continue to have an open mind regarding any potential further opportunities that may be taken to advance equality of opportunity between people who share a protected characteristic and people who do not share it.</p> <p>The Council will continue to be alert to how proposed policies may or may not impact on particular groups and have due regard to the interests and needs of those sharing the protected characteristics under the Equality Act.</p> <p>The Council will consider responses to the Regulation 19 consultation to assist in identifying opportunities to advance the aims of the PSED.</p>																																					
<p>25. Should the policy proceed to a full equality impact assessment? Please use the scoring process in the right hand column to guide you.</p>	<p>Y</p>	<p><input type="checkbox"/> N</p>	<table border="0"> <tr> <td>0 – no possible relevance or adverse impact</td> <td>0-11 points</td> <td>low adverse impact, no need for full EIA</td> </tr> <tr> <td>1 – extremely low relevance and adverse impact</td> <td>12-20points</td> <td>medium adverse impact, full EIA required</td> </tr> <tr> <td>2 – relatively low relevance and adverse impact</td> <td>21-27 points</td> <td>high adverse impact, full EIA required</td> </tr> <tr> <td>3 – medium relevance and adverse impact</td> <td></td> <td></td> </tr> <tr> <td>4 - relatively high relevance and adverse impact</td> <td></td> <td></td> </tr> </table> <table border="1"> <thead> <tr> <th>Age</th> <th>Disability</th> <th>Mat</th> <th>Gender</th> <th>Marriage</th> <th>Race</th> <th>Trans</th> <th>Sexuality</th> <th>Religion</th> <th>Total</th> <th>Impact</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>1</td> <td>0</td> <td>0</td> <td>0</td> <td>1</td> <td>0</td> <td>0</td> <td>1</td> <td>4</td> <td>Low</td> </tr> </tbody> </table>	0 – no possible relevance or adverse impact	0-11 points	low adverse impact, no need for full EIA	1 – extremely low relevance and adverse impact	12-20points	medium adverse impact, full EIA required	2 – relatively low relevance and adverse impact	21-27 points	high adverse impact, full EIA required	3 – medium relevance and adverse impact			4 - relatively high relevance and adverse impact			Age	Disability	Mat	Gender	Marriage	Race	Trans	Sexuality	Religion	Total	Impact	1	1	0	0	0	1	0	0	1	4	Low
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26. If a full EIA is not required, are there any changes required to the proposal to improve it around the equality agenda?			There are no changes considered to be required at this point.
27. How will any actions identified in 20. to 26. above be taken forward?			Any comments in relation to improving the LP DMP in terms of the potential to support Council's obligations in terms of the PSED will be considered.

Signed

Riaan van Eeden

Riaan van Eeden (completing officer)

Date: 10 September 2021

Signed

S. Harrison

Stuart Harrison (Head of Service)

Date: 10 September 2021

Countersigned

Ali Holman

Ali Holman (Specialist HR (Business Partner) – Equalities)

Date: 22 September 2021