

# Equality Impact Assessment

Mole Valley Local Plan  
Housing and Traveller Sites Plan – NEW SITES 2014



|  |  |
|--|--|
| <b>What is being assessed?</b>                       | <b>Housing and Traveller Sites Plan – NEW SITES 2014</b> |
| <b>Department</b>                                    | <b>Planning Policy</b>                                   |
| <b>Name of assessor/s</b>                            | <b>Sarah Todd</b>  |
| <b>Strategic Management Lead</b>                     | <b>Yvonne Rees</b>                                       |
| <b>Date</b>  | <b>7 May 2014</b>  |
| <b>Is this a new or existing function or policy?</b> | <b>New policy document</b>                               |

## **Introduction and background**

**Please describe your service or function. This should include:**

- **The aims and scope**
- **The main beneficiaries or users**
- **The main equality, accessibility, social exclusion issues and barriers, and the ‘protected characteristics’<sup>1</sup> they relate to (not all assessments will encounter issues relating to every protected characteristic)**

**If this EqlA is part of a project it is important to focus on the service or policy the project aims to review or improve.**

### **The Housing and Traveller Sites Plan – Overview & Policy Context**

The Housing and Traveller Sites Plan (HTSP) is linked to the Core Strategy, which was adopted by the Council on 1st October 2009, and is part of the Mole Valley Local Plan, formerly the Local Development Framework (LDF).

The principal function of the Housing and Travellers Site Plan is to help deliver the housing objectives of the Core Strategy. Whilst the Core Strategy specifies how much development should take place in the District and where it will be located in general terms, it is the role of the Housing and Travellers Sites Plan to identify and allocate specific sites for housing across the District. Housing sites will be both market and affordable and the plan will seek to allocate sites for Gypsies, Travellers and Travelling Showpeople.

As well as being informed by the objectives and policies of the Core Strategy, the Plan is shaped by national planning guidance set out in the National Planning Policy Framework (NPPF) and accompanying National Planning Practice Guidance (NPPG)

How the Council involves its community in the preparation of the Local Plan is largely regulated by national government. The Council is required to prepare a Local Plan and consultation on Local Plan documents must be in accordance with the adopted Statement of Community Involvement (SCI).

<sup>1</sup> More information and definition of protected characteristics can be found [here](#)

## **The Housing and Traveller Sites Plan – NEW SITES 2014**

MVDC consulted on the Housing and Traveller Sites Plan in the spring of this year. There were just over 8,000 comments received from over 3,000 individuals and groups to the consultation. The Plan contained information on a site by site basis on all the land in the District that developers and landowners had asked the Council to consider. It identified the key issues which each site raised and highlighted those sites where it is felt that there is no reasonable prospect of development being acceptable.

In response to this consultation a further small number of landowners asked MVDC to consider some additional sites around the District. These are set out in the New Sites 2014 consultation document in the same way as those in the HTSP. A further consultation is needed on the new sites as MVDC needs to explore all opportunities before coming to a decision on which sites should be removed from the Green Belt through the preparation of the plan. This is the final opportunity for landowners/developers to submit sites for consideration to MVDC.

Following the close of the consultation the new sites will be considered alongside the 80 sites consulted on in Spring 2014. The purpose of the consultation is to help the Council decide which sites would be most appropriate for development. Not all of the sites that have been promoted to the Council will be needed for development and not all will ultimately be appropriate.

An overarching Sustainability Appraisal (SA) of the Housing and Traveller Sites Plan has been completed as well as individual Sustainability Appraisals for each of the sites. The process of Sustainability Appraisal has informed the assessment of each of the sites and will be an important tool in selecting the most appropriate sites for allocation. A SA is required for all Local Plan documents and is an appraisal of the economic, social and environmental sustainability of the plan. The SA work produced for the Spring 2014 consultation also applies to this further consultation.

The preferred sites for allocation will be outlined in the Proposed Submission version of the plan, expected to be published in January 2015. This will identify those sites which the Council considers to be most suitable for development. Representations will then be invited on the Proposed Submission Plan and the document will ultimately be considered by an independent Planning Inspector.

### **Consultation**

It is important that residents are aware of this further consultation on new sites and are able to comment. We will ensure that the document is available both online and in hardcopy and that publicity about the consultation is disseminated appropriately. Hard copies of the documents will be available to view at all libraries and help desks across the district.

The consultation documents can also be made available to view in other languages, easy-read (for learning disabilities) and formats suitable for the visually impaired.

The consultation document will contain a detailed assessment for each site as well as a concluding summary clearly highlighted in a box outlining the key considerations for each. This will help ensure that the document is accessible to a wide audience.

Everyone registered on the Local Plan consultation database who has previously made comments on either the Green Belt Boundary Review Consultation or the HTSP consultation in the spring of this year plus statutory and other key consultees such as Parish and Resident Associations and Neighbouring Authorities (even if they have not previously commented), will receive a notification via email/letter about the consultation.. Further to this letters will be sent to all those people who adjoin any of the new sites. Developers and agents who have submitted sites for consideration will also be notified

The Planning Policy team will be available to help with any queries throughout the consultation period.

### **The Main Beneficiaries or Users**

The aim of the Housing and Traveller Sites Plan is to allocate land for housing focused on the main towns and larger rural villages across the District. It will however be of interest to all residents, businesses and service providers.

The majority of respondents to previous consultations i.e. the Core Strategy and Dorking Town AAP are residents. Further to this it may also be of interest to people currently living outside the district but who would like to move to Mole Valley in the future.

A large number of developers / landowners and agents are also involved in the process to ensure that their clients land interests are represented, as are a large number of community groups i.e. Parish Councils and Resident Associations.

### **The main equality, accessibility, social exclusion issues and barriers, and the equality strands they relate to (not all assessments will encounter issues relating to every strand)**

The main equalities challenge for the consultation is to ensure that all parts of the community have the opportunity to consider and respond to the proposals if they wish to do so. Whilst the Housing and Traveller Sites Plan consultation is aimed at the District's community – there are some communities which could be more affected by the Plan than others.

Travellers in Mole Valley are a specific focus of the HTSP although this current consultation document does not include any specific sites or proposals in relation to their needs. However it is important that they are aware of the Plan and engage with the consultation process. To ensure thorough engagement with this hard to reach community contact will be arranged in partnership with Gypsy Liaison Officers and Site Managers. A meeting has also been arranged for the Travelling community on Tuesday 20<sup>th</sup> May 2014 to discuss the Housing and Traveller Sites Plan.

Some of the potential equalities impacts will be as a result of geographical location rather than the protected characteristics identified under the Equalities Act. This impact is likely to be felt by those living in certain areas, such as those that have previously experienced little development (e.g. communities on the edge of the built-up areas of the District).

**Now describe how this fits into the Council's Corporate Priorities, Sustainable Community Strategy or other local, regional or national plans and priorities.**

**Corporate Priorities**

***Access to Services – Helping residents to access the services they need***

1. Improve the way we listen to, and engage with our Customers and communities.
2. Working with our partners to provide the right services to our local residents.

The Housing and Traveller Sites Plan – NEW SITES is the latest in a number of consultations that the Council has undertaken in relation to sites which landowners and developers are seeking to have allocated for development in the Local Plan. Most recently this has included a consultation on the Housing and Traveller Sites Plan: Consultation in January 2014.

Information about the work being undertaken and how options are assessed and choices made will be clearly set out and made available via the Council's website, in the Council Offices, the Leatherhead HelpShop, in libraries. Officers can also make themselves available in order to explain the issues and processes.

A key part of the preparation of the HTSP is engaging with service providers. This has already been taking place but MVDC will use the opportunity of this further consultation to speak in more detail with those that we have so far received little input from.

***Environment - Maintaining the character and environment of Mole Valley***

1. Support businesses and the local economy by enabling development in the district and facilitating appropriate housing growth.
2. Improve the quality of the built environment whilst preserving the character and integrity of our towns and villages, and protecting the rural landscape.

The Housing and Traveller Sites Plan will be an important document in the Mole Valley Local Plan. It is a vehicle for delivering the housing objectives set out in the Core Strategy.

Through the development of the Housing and Traveller Sites Plan, MVDC will continue to focus on improving the quality of the built environment whilst preserving the character and integrity of our towns and villages.

The delivery of new housing is a Government priority. The Council has to determine, in consultation with its communities, how best to do this whilst protecting both the built and natural environment. The housing development required in the District cannot be accommodated on brownfield sites within the built up areas without the loss of other important land uses which MVDC wishes to safeguard, including for example businesses and recreation facilities. Moreover, intensification of development in existing residential areas could have a harmful impact and change to their character which could be damaging to the quality of the built environment. This has to be balanced against the impact of developing open land currently in the Green Belt.

**If you are not carrying out an equality impact assessment, briefly summarise reasons why you have reached this conclusion, the evidence for this and the nature of any stakeholder verification of your conclusion.**

**n/a**

## Analysis and assessment

Given available information, what is the actual or likely impact on minority, disadvantaged, vulnerable and socially excluded groups?  
 Indicate for each 'protected characteristics' whether there may be a positive impact, negative impact, a mixture of both or no impact.  
 (Refer to page 11 of the EqIA guidance for full list of issues to consider when making your analysis)

| Protected Characteristics | Positive | Negative | No impact | Reason   |
|---------------------------|----------|----------|-----------|--|
| Age                       | ✓        | ✓        |           | <p>The Plan aims to locate housing near existing services and facilities. This may be an advantage to older people and those who may otherwise have been isolated.</p> <p>The Plan will result in the development of more affordable housing. This may benefit younger and older persons, as these groups tend to have greater need for affordable housing as their needs are not met by the open market.</p> <p>There is also a potential negative impact which arises from increased demand on key services – education, health etc. This increased demand could be detrimental to existing communities and lead to more limited opportunities for new residents. This may be of particular concern for children and older people who tend to have a higher demand for key services and are more vulnerable groups.</p> <p>The Consultation will need to ensure that older people are fully included and able to respond effectively to the proposals. Whilst many older people will be able to engage with electronic methods of consultation, which will be the preferred method, provision will be made for those who are unable or unwilling to do so. Hard copies of the documents will be available to view at all libraries and help desks across the district and comments will always be accepted in the form of a letter of hard copy comments form.</p> |
| Race                      | ✓        | ✓        |           | <p>As part of the Plan the Council will be allocating sites to meet the future identified housing needs of Gypsies, Travellers and Travelling Showpeople.</p> <p>Their needs have been assessed through the preparation of a Gypsy and Traveller Accommodation Assessment (GTAA) and the plan will then seek to address these</p>  |

|            |   |  |   |  |
|------------|---|--|---|--|
|            |   |  |   | <p>needs, including those on sites with temporary permission. The consultation is an opportunity for travellers to engage in the development of this document and play an important part in determining which are the most suitable sites to meet their needs.</p> <p>There is the potential to strengthen the relationship with the Travelling Community through this work. However, there is also concern that the 'settled community' close to where sites are allocated will feel disadvantaged i.e. interest prejudiced / giving 'preferential' treatment to the Travelling Community by allocating development in locations unlikely to be considered for other types of development.</p> <p>No specific impacts arising from the Plan are anticipated for other race groups. .</p> <p>The Consultation will ensure that ethnic minorities within the community are enabled to participate and express their views. This will include the offer of materials in selected other languages and liaison with representative groups on how best to overcome cultural and communication barriers. The Traveller community, as the most directly affected by the Plan itself, will be a particular focus and contact will be made with Gypsy Liaison Officers and Site Managers to establish effective communication with these hard-to-reach communities.</p> |
| Disability | ✓ |  |   | <p>Development proposals identified through the Plan will be required to meet DDA standards when planning applications are submitted.</p> <p>Where sites are allocated consideration will be given to improving footways and pedestrian access through sites and connecting them to existing developments.</p> <p>The Council will aim to ensure consultation documents are made available in a range of formats in particular to ensure those with poor vision are not disadvantaged, and easy-read versions will be available for people with learning disabilities. Contact will be made with representative bodies within the District and immediately surrounding area to advise them of the consultation and take advantage of the communication channels they can offer, as well as receiving their own views and comments.</p>   |
| Gender     |   |  | ✓ | It is not considered that the Plan will impact on gender issues.   |
| Gender     |   |  | ✓ | It is not considered that the Plan will impact on gender re-assignment issues.   |

|                                      |   |   |   |   |
|--------------------------------------|---|---|---|---|
| Re-assignment                        |   |   |   |   |
| Religion and belief                  |   |   | ✓ | It is not considered that the Plan will impact on religion and belief issues.   |
| Sexual Orientation                   |   |   | ✓ | It is not considered that the Plan will impact on sexual orientation issues.  |
| Marriage and Civil Partnerships      |   |   | ✓ | It is not considered that the Plan will impact on Marriage and Civil Partnership issues.  |
| Pregnancy and Maternity              |   | ✓ |   | Additional development is likely to lead to an increased demand for key services, particularly health care in this instance. Health care provision is likely to be stretched as demand increases. However there are no specific impacts implicit in the Consultation for this group,.   |
| Other equality issues – please state | ✓ |   |   | There is opportunity to provide new development / services that meets the needs of those on lower incomes i.e. affordable housing.  |
| Rural/Urban issues                   | ✓ | ✓ |   | <p>The Plan provides for new development within the built-up and rural areas of the District.</p> <p>Within rural communities the Plan provides the opportunities for more affordable homes to be provided. This will help maintain a balanced community, contributing to the viability of village life. The majority of new homes and other developments will however, be provided within the built-up areas. Rural communities can also seek affordable housing through Rural Exception policies, in addition to this plan making process.</p> <p>Some communities within the built-up areas do, however, feel that they have had 'their fair share' of development in comparison to the District's rural communities and that any more development would impact on their quality of life.</p> <p>If supporting infrastructure (health care / educational facilities) is not provided alongside new development, this may negatively impact on the community. As the majority of development will be directed to the built-up areas this may be more acutely felt in those areas.</p> |
| HR issues                            |   |   | ✓ | It is not considered that the Plan will impact on HR issues.  |

**What can be done to reduce the effects of any negative impacts? Where negative impact cannot be completely diminished, can this be justified, and is it lawful?**

The potential negative impacts identified are:

- *Age*

Consideration will be given to the specific availability and access to services supporting both children and older people. Provision will be made within the consultation process to ensure that adults of all ages are able to engage, understand and comment on the proposals

- *Race*

The Housing and Traveller Sites Plan will ultimately allocate housing sites for both the settled and travelling community. Sites which are not deemed appropriate for housing may be considered for travellers. Some members of the 'settled community' may feel disadvantaged i.e. interest prejudiced / giving 'preferential' treatment to the Travelling Community by allocating development in locations unlikely to be considered for other types of development

The plan aims to meet the housing requirements as set out in the Core Strategy and the Gypsy and Traveller Accommodation Assessment and therefore must find appropriate housing and traveller sites. A strategic approach which considers sites across the whole district has therefore been taken to ensure the most appropriate sites are allocated.

Provision will be made within the consultation process to ensure that adults from all minority groups and communities within the District are able to engage, understand and comment on the proposals.

- *Rural / Urban issues*

The majority of development that will take place within the District will be in the built-up areas. To ensure that the impacts are mitigated against the Council will carefully consider the 'supporting infrastructure' needs that go alongside an increase in development within an area. All infrastructure requirements will be outlined in an 'Infrastructure Delivery Plan' (IDP) which must be prepared alongside the development of this plan. It will outline where infrastructure is required, when by, how it will be delivered, who will be responsible for its delivery, how much it will cost and any contingency plans. The IDP will be published alongside the Proposed Submission version of the Housing and Traveller Sites Plan,.

Focusing development towards the built-up areas is justified as these areas have been identified as the most sustainable locations with the highest levels of supporting infrastructure and ability to cope with an increase of development. This approach is consistent with the principles established in the Core Strategy, as well as national policy.

- *Pregnancy and Maternity*

No specific measures are planned as part of the Consultation process itself.

**Where there are positive impacts, what changes have been or will be made? Who are the beneficiaries? How have they benefited?**

**There is potential through the Plan to:**

- provide affordable housing across the District which may particularly benefit those on low incomes, older and younger people within the District and those living in rural communities.
- work with Surrey County Council to ensure allocated sites have good footways and pedestrian access through them and are connected to existing developments.
- address issues of safety i.e. improved lighting / designing out crime in new developments.
- provide accessible information to Mole Valley residents on the consultation and seek the involvement of a wide range of people.

**Evidence gathering and fact-finding**

(Page 12 of the guidance)

**What evidence is available to support your views above? Please include:**

- A summary of the available evidence
- Identification of where there are gaps in the evidence (this may identify a need for more evidence in the action plan)
- What information is currently captured with respect to usage and take up of services.
- What the current situation is in relation to equality and diversity monitoring (where relevant)

**Evidence available to inform the Housing and Traveller Sites Plan:**

- East Surrey Gypsy & Traveller Accommodation Assessment (GTAA).
- Core Strategy (supported by a range of evidence base documents)
- Sustainability Appraisal / Strategic Environmental Assessment (SA / SEA).
- Transport Modelling Report
- Housing and Traveller Sites Plan: Site Assessment
- Green Belt Boundary Review (GBBR)
- Consultation responses on the Housing and Traveller Sites Plan January 2014

The evidence base will also include information received through discussions with key service providers i.e. Surrey County Council (Education); Sewerage and Water Companies; and the Highways Agency.

Access is also available to Census data at a District, Ward, Neighbourhood or Output Areas; Mosaic data; Annual Business Information data; Indices of Multiple Deprivation (IMD) information.

Informing the development of the Housing and Traveller Sites Plan will also be feedback from consultation events. This could include discussions with individual

groups or larger forums and from informal and formal consultations.

### **Identification of where there are gaps in the evidence**

There are gaps in the current evidence base for the Housing and Traveller Sites Plan. However, the purpose of the various consultation stages is to gather this evidence and the views of the public.

Evidence that will need to be collected includes:

- the need for community facilities that may need to be provided to mitigate against new development i.e. additional schools places / health facilities.
- Detailed information on specific sites which are to be allocated for development – this has started to be requested from those submitting sites.
- Views of the public – which will be sought throughout the process. Consultation on the plan will take place from Monday 9<sup>th</sup> June 2014 for a 6 week period.

### **What information is currently captured with respect to usage and take up of services**

The Planning Policy Team used to ask for information such as age, gender etc from those submitting representations. However, this was infrequently completed and therefore recently has not been included on representation forms.

It is from reading the consultation responses and from Officers individual knowledge that it is known that a large number of developers / landowners and agents are involved in the process and that a large number of representations are from community groups i.e. Parish Councils and Resident Associations.

### **What is the current situation in relation to equality and diversity monitoring (where relevant)**

As stated above this was previously monitored alongside every response. Address information is collected for every response and therefore respondent's postcodes could be cross referenced with mosaic data to gain an understanding of the socio-economic profile of respondents if this was felt to be necessary.

Specific sources of equality and diversity evidence may include:

- Service monitoring reports including equality monitoring data
- User feedback
- Population data – census, state of the district, Mosaic
- Rural and or urban deprivation indicators
- Complaints data
- Published research, local or national.
- Feedback from consultations and focus groups
- Feedback from individuals or organisations representing the interests of key target groups
- Evidence from partner organisations, other council services, districts or County councils and other local authorities

**How have stakeholders been involved in this assessment? Who are they, and what is their view?**

Stakeholders have been involved in initial conversations regarding the sites put forward for the Housing and Traveller Sites Plan. As the 'preferred' sites are established through consultation and further research, the engagement with stakeholders will increase.

This EqIA will form part of the evidence base for the Housing and Traveller Sites Plan and will be available for comment during the consultation. The EqIA will be reviewed during the preparation of the Plan which will provide opportunity for comments to be taken on board in preparing the Plan and assessing its potential impacts on the Mole Valley community through the assessment.

The Plan itself is prepared in partnership with a number of statutory and specific consultation bodies.

**Recommendations**

**Please summarise the main recommendations arising from the assessment. NB If it is impossible to diminish negative impacts to an acceptable or even lawful level the recommendation should be that the proposal or the relevant part of it should not proceed.**

- Publish the EqIA as a background document for comment as part of the consultation on the Housing and Traveller Sites Plan – NEW SITES 2014.
- Undertake an EqIA of the Housing and Travellers Sites Plan at the Proposed Submission stage
- Continue to include 'equalities' comments at the end of reports to Members.
- Continue to review and consider if any individual allocations or policies lead to potential impacts on specific communities. If necessary undertake further EqIA.

**Action Plan – actions needed to implement the EqIA recommendations**

| Issue            | Action  | Expected outcome                         | Who             | Deadline for action  |
|------------------|---|--|-----------------|--|
| Publish the EqIA | Publish the EqIA and include in the list of supporting documents. | Comments received to improve assessment. | Planning Policy | Consultation 9 <sup>h</sup> June – 21 <sup>st</sup> July 2014. |

|  |   |  |                 |                |
|--|---|--|-----------------|----------------|
| Undertake further EqIA as the Housing and Traveller Sites Plan is prepared | Undertake further EqIA as the Housing and Traveller Sites Plan is prepared  | Continue to refine this EqIA to explore and assess potential impacts once sites are known. | Planning Policy | 2013 – 2015.   |
| Ensure appropriate level of health service provision                       | Liaise with health care providers   | Ensure provision of required health care services  | Planning Policy | 2014-2015      |
| Equalities comments  | Continue to include 'equalities' comments at the end of reports to Members. | Inform Members of the equalities implications that decision being made may have.           | Planning Policy | When required. |

- Actions should have SMART Targets
- Actions should be reported to the Equality and Diversity Working Group and incorporated into the Equality and Diversity Action Plan, Service Plans and/or personal objectives of key staff.

### Summary Sheet

|   |                      |
|---|----------------------|
| Review date                                     | January 2015         |
| Person responsible for review                   | Planning Policy Team |
| Strategic Management Lead signed off            | Yvonne Rees          |
| Date completed                                  |                      |
| Date forwarded to Policy Officer for publishing |                      |

- **Signed off electronic version to be kept in your team for review**
- **Electronic copy to be forwarded to the Policy Team for publishing**