

FAREHAM

BOROUGH COUNCIL

Equality Impact Assessment on Fareham Local Plan Part 3: the Welborne Plan

What is an EIA? It is not an end in itself – it is a way of ensuring and showing that due regard has been paid to the general duties

When to do an EIA? They should be an integral part of policy development and review, not a one off or separate exercise. Also the analysis should ALWAYS inform all relevant decisions.

What to assess? A policy should be impact assessed if it is relevant to equality, with the most relevant policies assessed first and most thoroughly

Name of Strategy/Policy/Procedure being reviewed	Local Plan Part 3: The Welborne Plan June 2014
Service and Department responsible for managing Strategy/Policy/Procedure	Planning and Development
Names and job titles of officer completing this assessment	Toby Ayling, Infrastructure Project and Delivery Officer (Welborne)
Date of assessment	August 2014

What is the main purpose of the Strategy/Policy/Procedure being reviewed?	To set out how the new community of Welborne should take shape through to 2036.
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Remember They are not only about addressing discrimination or adverse impact. They are about positive promotion of equality of opportunity, improving access, participation in public life and good relations.

Background

The Local Plan Part 3: the Welborne Plan, is a site specific land-use planning document which sets out how the new community of Welborne should develop up to 2036. It has been written in the context of, and takes into account the National Planning Policy Framework(NPPF), the Town and Country Planning (Local Planning) (England) Regulations 2012, the Environmental Assessment of Plans and Programmes Regulations 2004 and the EU Directive 2001/42/EC on the Environmental Assessment of Plans and Programmes. This means that:

- The detail in the Plan now assessed is the result of consultation on Options (Jan-July 2012), on the Draft Plan (April – June 2013) and on the Publication Draft Plan (February – April 2014). This consultation has been carried out in accordance with the FBCs [Statement of Community Involvement](#) which recognises groups in society that have specific needs or have been traditionally under-represented in the planning process. These are the young, rural communities, people on low incomes, non-readers, disabled people, those with learning difficulties, 16-25 year olds, minority ethnic groups and those whose first language is not English, working men and women aged 25-50, particularly those that commute out of the Borough and who work long hours. More recently FBC has consulted on a suggested change to the Plan, namely the introduction of an alternative site for the secondary school. However, it is not considered that this change significantly affects equality issues as suggested by the fact that the Equality and Human Rights Commission did not comment on the change.
- The NPPF sets out that the purpose of planning is to achieve sustainable development (paragraph 6). It quotes the UK Sustainable Development Strategy *Securing the Future* which sets out five ‘guiding principles’ of sustainable development. These are: living within the planet’s environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly. Clearly equality issues are at the heart of this second guiding principle: they have therefore been a central consideration in the writing of the Welborne Plan.
- Paragraph 173 of the NPPF states, “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”. This is reflected in the Welborne Plan and will mean that the deliverability of benefits to equality groups will be dependent upon achieving the overall viability of the development at planning application stage.
- Throughout the Plan making process, the Welborne Plan has been subject to Sustainability Appraisal which promotes sustainable development through the integration of environmental, social and economic considerations into the plan’s preparation. The detail of this process is set out in the document, [Sustainability Appraisal of the Welborne Plan](#) published January 2014. This shows how

preferred options and policies now included in the Welborne Plan have been chosen as a result of the assessment of alternatives against 11 sustainability appraisal objectives. Four of these are particularly relevant to matters of equality:

1. To provide good quality and sustainable housing for all;
2. To promote accessibility and encourage travel by sustainable means;
3. To strengthen the local economy and provide accessible jobs available to residents of the new community;
4. To create a healthy and safe new community.

The Welborne Plan has therefore been written and completed in a legislative and guidance framework which has required that equality issues have been taken into account through consultation exercises, through sustainability appraisal and through the objective, to achieve sustainable development, set out in the NPPF.

Does the Strategy/Policy/Procedure target or exclude any of the equality groups listed below? Or affect any of them disproportionately? (List both positive and negative impacts and explain how).

Equality Group	Target or exclude?	Disproportionate impact?
All equality groups	<p>Indirectly target: - an inclusive community to be created.</p> <ul style="list-style-type: none"> • Plan objective 1 to be met by facilitating, “A diverse mix of uses, layouts, and connections that create and sustain a successful, vibrant, inclusive and cohesive community” (pg 17). • Policy WEL2 states, “The new development will create an inclusive and sustainable community...”. To support this aim, the Infrastructure Delivery Plan (IDP) (Stage 2 update report Jan 2014) which sets out infrastructure required by the Welborne Plan and states how it will be delivered, includes a sum of £30,000 for community development which its states is desirable and is to be paid for by the Master Developer. • Policies WEL11, WEL12 and WEL13 state that local district and community hub facilities will be provided. These are included in the IDP. • Quantum of housing assessed favourably against Sustainability Objective: “To provide good quality and sustainable housing for all”. 	No disproportionate impact anticipated.

Gender	Indirectly target: - <ul style="list-style-type: none"> • Policy WEL6 iii states that layout and design will help create safe well-connected neighbourhoods. This will positively impact all genders, but particularly women. 	No disproportionate impact anticipated.
Transgender	Indirectly target: - an inclusive community to be created. <ul style="list-style-type: none"> • Policy WEL6 iii states that layout and design will help create safe well-connected neighbourhoods.. 	No disproportionate impact anticipated
Age	Target: - Plan includes some age specific infrastructure <ul style="list-style-type: none"> • The IDP recognises the needs of groups of differing age: <i>The young:</i> it is stated as desirable that a minimum of 3,900sq.m. of local play spaces (0-11 ages) be distributed from 2015 onwards, paid for by the master developer. This play space provision reflects Policy WEL29. 3 Nurseries, and 3 primary schools are to be provided by Master Developer. <i>Youths:</i> it is stated as desirable that a minimum of 3,900sq m of neighbourhood play spaces be distributed from 2015 onwards, to be paid for by Master Developer. This play space provision reflects Policy WEL29. 1 secondary school is to be provided by the master developer. <i>Older People</i> The IDP places high priority on the delivery of 16 extra care housing units to 2036, and 34 by 2050 to be provided by a third party. Policy WEL19 applies to specialist accommodation for older people and sets out locational and access requirements and that schemes should explore opportunities to incorporate wider community facilities, shall include provision to meet needs of older people who cannot afford private market specialist housing and it delivered with public support, shall include a large proportion of units with affordable or social rent. • Policy WEL17 will ensure that a mix of market housing for a range of households including younger and older families. It requires that approximately 15% of market homes in each development phase are built to Lifetime Homes standards. • Policy WEL6 iii states that layout and design will help create safe well-connected neighbourhoods. This will positively impact all, but particularly the young and the very old. • Paper documents of the Plan are available at the Civic Offices and at Fareham library and can be sent to individuals on request. 	Positive impact on younger and older age groups.

Race	Indirectly target: <ul style="list-style-type: none"> The Welborne Plan is available in other languages. 	No disproportionate impact anticipated
Disability and health	Target: includes policies to ensure provision of health and disability related infrastructure. <ul style="list-style-type: none"> Policy WEL20 states that development will only be permitted where it includes a proportion of homes designed to high standards of accessibility, suitable for occupation by wheelchair users. Policy WEL17 states, "Planning permission will be granted for development that delivers an appropriate mix of good quality market housing, suitable for a wide range of different households including younger and older families, single people, the retired and those with reduced mobility". Policies WEL2 and WEL14 state that Welborne shall include one or two primary care centres of sufficient size to accommodate at least 8 GP surgeries in total plus, ancillary primary care uses. Policy WEL29 sets out minimum open space requirements for the provision of parks and amenity open space, sports pitches, allotments and open and semi natural greenspace in which residents will be able to exercise and walk. This provision is included in the IDP and with the exception of a full size artificial grass pitch is to be provided by the master developer. Policy WEL28 requires that proposals for development will be permitted only where they provide for a network of strategic pedestrian and cycleway routes that link key destinations: this will encourage walking and cycling and will therefore benefit health. The Welborne plan is available in other formats eg. Large Print. 	Positive impact on people with disabilities.
Sexual orientation	No specific targeting or exclusion	No disproportionate impact anticipated
Religion and belief	Target: <ul style="list-style-type: none"> Policy WEL13 states that the comprehensive masterplan(s) that accompany the initial planning applications shall incorporate sufficient and appropriately located space for the development of churches or other places of worship. 	Positive impact by facilitating the provision of space for churches or other places of worship
Marital status	Target: will include housing for households of all size and an inclusive community to be created	No disproportionate impact anticipated

	<ul style="list-style-type: none"> Policy WEL17 states, "Planning permission will be granted for development that delivers an appropriate mix of good quality market housing, suitable for a wide range of different households including younger and older families, single people, the retired and those with reduced mobility". 	
Pregnancy/maternity status	No specific targeting or exclusion	No disproportionate impact anticipated
Caring responsibilities	<p>Indirectly target: - Plan targets those needing care, thus indirectly benefitting carers.</p> <ul style="list-style-type: none"> As seen above in the sections of age and on disability and health the Plan targets the needs of the young, youths, the old and those using wheelchairs. This will benefit those caring for these groups. 	Positive impact
Poor literacy/numeracy	<p>Target -through library provision</p> <ul style="list-style-type: none"> WEL13 states that a library will be provided within the community building in the District Centre. This could potentially target poor literacy if literacy and numeracy support is provided within the library. 	No disproportionate impact anticipated
Unemployed	<p>Target- new employment floorspace to be created</p> <ul style="list-style-type: none"> WEL9 states that new employment floorspace will provide a range of jobs. Paragraph 5.14 approximately 5,700 jobs could be created to include office, light industrial, warehouse, retail, residential care, and civic jobs and jobs held by people working at and from home. 	Positive impact
Low income	<p>Target and indirectly target– low cost housing and a strategy that will minimise travel cost, included</p> <ul style="list-style-type: none"> WEL18 states that Welborne shall provide a total of 30% affordable housing (1,800 homes) with an initial tenure split of 70% affordable social rent and 30% intermediate tenures. This will include affordable units to meet the needs of old people. The Plan aims to create high levels of self-containment (WEL2) and will include supporting social and physical infrastructure, a range of convenience and comparison shopping, local employment, health, community and leisure facilities 	Positive impact

	<p>centred around a new district centre and pre-school, primary and secondary school provision. In addition the new community will include good pedestrian and cycle links to key destinations, will be part of the Bus Rapid Transit network and will include local bus infrastructure. This could reduce dependency on the car and has the potential to minimise travel costs.</p> <ul style="list-style-type: none"> • The Plan states that Welborne will include semi-natural greenspace and parks: the majority of these will have free public access and will serve as a recreational facility. 	
On benefits	<p>Target and indirectly target– low cost housing and a strategy that will minimise travel cost included</p> <ul style="list-style-type: none"> • WEL18 states that Welborne shall provide a total of 30% affordable housing (1,800 homes) with an initial tenure split of 70% affordable social rent and 30% intermediate tenures. This will include affordable units to meet the needs of old people. • The Plan aims to create high levels of self-containment (WEL2) and will include supporting social and physical infrastructure, a range of convenience and comparison shopping, local employment, health, community and leisure facilities centred around a new district centre and pre-school, primary and secondary school provision. In addition, the new community will include good pedestrian and cycle links to key destinations, will be part of the Bus Rapid Transit network and will include local bus infrastructure. This could reduce dependency on the car and has the potential to minimise travel costs. • The Plan states that Welborne will include semi-natural greenspace and parks: the majority of these will have free public access and will serve as a recreational facility. 	Positive impact

Here you will need to make a judgement as to whether the Strategy/Policy/Procedure furthers the aims of the duties

	Yes/No	If yes how?
Eliminate discrimination & prohibited conduct	No	n/a
Advance equality of opportunity	Yes	As outlined in the table above, all equality groups are either directly or indirectly targeted in the Plan. As seen in the table above, in several

		cases the Plan will have a positive impact.
Foster good relations	Yes	The building of community facilities and a budget for community building as set out in the IDP, should foster good relations.

If NOT then can the Strategy/Policy/Procedure be changed to enable it to further the aims of the duties?		
	Yes/No	How?
Eliminate discrimination & prohibited conduct	No	A land-use planning document does not have the ability to eliminate discrimination and prohibit conduct.
Advance equality of opportunity	Yes	n/a
Foster good relations	Yes	n/a

Doesn't let lack of evidence put you off

An equality impact assessment must be objective and must use evidence in deciding impact. Value judgements will not do!

What information/evidence have you used to make these judgements?	
Strategy/Policy/Procedure information	Summary of Representations received as result of consultation on Suggested Change to Submitted Version of Plan, and Council's response; Local Plan Part 3: The Welborne Plan June 2014; Welborne New Community Infrastructure Delivery Plan 2014 Stage 2 Update Report January 2014; FBC Statement of Community Involvement; Sustainability Appraisal of the Welborne Plan January 2014; the National Planning Policy Framework(NPPF); the Town and Country Planning (Local Planning) (England) Regulations 2012; the Environmental Assessment of Plans and Programmes Regulations 2004 and the EU Directive 2001/42/EC on the Environmental Assessment of Plans and Programmes.
Complaints	Comments received on the publication draft of the Plan have been analysed and where appropriate taken into account in the Submission document. No complaints relevant to equality issues have been received in response to the consultation on the suggested change.
Customer surveys	The Plan has been finalised as a result of consideration of result of consultation exercises, as specified above.

Other indications of problems encountered by particular groups?	Not Known
Information held by other departments	None used
National Studies	Not Known
Is there any other information relating to this Strategy/Policy/Procedure?	
None Known	
Is there any ongoing dialogue with relevant interest or user groups?	
<p>The Plan has been submitted to the Planning Inspectorate prior to its Examination by an appointed inspector. It may subsequently be amended as a result of issues that come to light during the examination or as a result of the recommendations made by the Examining Inspector. Once adopted, and as it continues to emerge, it will be implemented through the Development Management process when planning applications are submitted for the building of Welborne: consultation in accordance with FBC policy and The Town and Country Planning (Development Management Procedure) (England) Order 2010 will be carried out when these applications are submitted. In addition, Planning Policy Guidance encourages developers to engage with the local community at pre-application stage, to resolve potential issues. This is, however, beyond FBC's control.</p>	
How is the effect of the Strategy/Policy/Procedure on different equality groups to be monitored?	
<p>The Welborne Plan will be monitored in the Annual Monitoring Report against core indicators that assess the extent to which policies in the Plan are working towards the achievement of sustainable development. The Council also monitors completed planning obligations to ensure compliance by all parties with any covenants, restrictions and stipulations contained within them (paragraph 4.16). In this way, the provisions of the Plan will be monitored, although it is unlikely that it will be monitored specifically in relation to the equality groups.</p>	

Gender	Please see above
Transgender	
Age	
Race	
Disability and health	
Sexual orientation	
Religion and belief	
Marital status	
Pregnancy/maternity status	
Caring responsibilities	
Poor literacy/numeracy	
Unemployed	
Low income	
On benefits	

The quality of an assessment is not measured by the number of pages produced but by the quality of the analysis, the action taken as a result, and the outcomes achieved through implementation

Action Plan (to reduce or eliminate any adverse impacts)

The impact of the Plan on the equality groups is dependent upon how the Plan is implemented through the development management process. Currently, there are no recommendations for actions to amend the Plan in relation to its potential impact on equality groups.

Equality strand	Action and resources	Lead Officer	Timescale
All equality groups	Conduct equalities impact assessment on any subsequent changes to the Welborne Plan	Richard Jolley, Director of Planning and Development, FBC	Up until the formal adoption of the SPD by FBC.

Lack of data is never an excuse for not assessing impact. Some data will always be available, and where it is not, it must be actively gathered

Is there enough information to enable you to complete the impact assessment?	YES
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The assessment should always inform the final decision on a policy

Summary of findings and recommendations

The Local Plan Part 3: the Welborne Plan, June 2014 does directly or indirectly target all equality groups. In some instances a positive impact on certain equality groups should result. The content of subsequent planning applications for Welborne and the development management process will determine what is actually built: negotiations will take into account the policies in the Welborne Plan and all relevant SPDs, the needs of the equality groups that are directly or indirectly targeted, and matters highlighted in national planning guidance such as viability and deliverability of development.

Background information

The latest Fareham equality data is shown below

Equality Strand	2011 Census Statistics	EIA Service Statistics
Race	3.2% BME	
Disability	10.1% Limiting long term illness 9.7% Activities limited a little 6.8% Activities limited a lot	
Gender	51.4% Female 48.6% Male	
Sexual Orientation		
Religion/belief	63% Christian	
Age	21% over 65 26.6% under 24	
Transgender		