



Woking Local Development Document

**Site Allocations DPD  
Equality Impact Assessment**

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**Produced by the Planning Policy Team**

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## **1.0 Introduction**

- 1.1 The Council has a duty under the Equalities Act 2010 to consider the needs of all individuals in their day to day work such as shaping policy. This document constitutes an Equality Impact Assessment (EIA) of the Site Allocations Development Plan Document (DPD) which is currently being prepared by the Council. It has been prepared as proportionate evidence to demonstrate compliance with the equality duty. The overall purpose of the Site Allocations DPD is to identify sufficient range of sites to enable the development requirements of the Core Strategy to be met. The requirements of the Equalities Act would therefore apply to the preparation of the DPD.
- 1.2 The preparation of the Site Allocations DPD has evolved over time. The DPD was published for Regulation 18 consultation between 18 June 2016 and 31 July 2016. A total of 32,712 representations were received from 1,692 individuals and organisations. After the Regulation 18 consultation, the Council conducted a bespoke consultation between 6 January 2017 and 27 March 2017 on the possibility of substituting six safeguarded sites in the draft DPD with a single site at land east of Martyrs Lane. 32,164 representations were received during this consultation. The DPD has just been through Regulation 19 consultation and is expected to be submitted to the Secretary of State by end of July. At each key stage of the DPD preparation process, due consideration has been given to the Council's duty under the Equalities Act.
- 1.3 The Council is committed to eliminating discrimination and harassment wherever it exists and to promoting equality of opportunity for people no matter their age, disability, ethnic or national origin, race, religious belief or faith, gender or sexual orientation. This commitment is set out in the Woking Corporate Equality Scheme.

## **2.0 Site Allocations**

- 2.1 The Council has an adopted Core Strategy that sets out the overall quantum of development to be provided up to 2027, the broad distribution of the development and the standards that development has to achieve to be acceptable. The Core Strategy however does not allocate sites to enable the delivery of the development. It requires the Council to prepare a Site Allocations DPD to identify specific deliverable sites to enable the delivery of the requirements of the Core Strategy. The Council therefore has a policy obligation to prepare the Site Allocations DPD.
- 2.2 The Site Allocations DPD is a borough-wide development plan document that would potentially have implications on the day to day lives of local residents, businesses and visitors. The DPD allocates land for housing, community facilities and employment uses. It also safeguards land for infrastructure provision. It is important that the implications of the DPD are fully assessed to make sure that no one group is unduly disadvantaged.
- 2.3 The Council has been concerned to make sure that all sections of the community are involved in the preparation of the DPD and their views taken into account as the DPD continue to evolve. The Council is satisfied that to the best of its knowledge, all groups have had an equal opportunity to be involved in the preparation of the DPD and representations received throughout the process have been considered in a fair manner.

## **3.0 The Equality Duty and the Council's responsibilities**

- 3.1 The Equalities Act 2010 (the Act) protects people from discrimination on the basis of 'protected characteristics' and prohibits direct and indirect discrimination, harassment, victimisation and failing to make a reasonable adjustment for a disabled person. A key part of the Act is the public sector Equality Duty.

- 3.2 The Equality Duty is a duty on the Council when carrying out public functions. It ensures that the Council considers the needs of all individuals in their day to day work - in shaping policy, in delivering services and in relation to their own employees.
- 3.3 The Equality Duty has three aims. It requires the Council to have due regard to the need to:
- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
  - advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
  - foster good relations between people who share a protected characteristic and people who do not share it.
- 3.4 Having due regard means consciously thinking about the three aims of the Equality Duty as part of the process of decision-making. This means it is important to understand the potential effects of policies and activities on different groups. EIA's are a way of recording this process and assessing the impacts of such policies in a consistent manner.
- 3.5 The Act protects people from discrimination on the basis of the following protected characteristics:
- race
  - disability
  - sex
  - age
  - gender reassignment
  - religion and belief
  - sexual orientation
  - marriage and civil partnership
  - pregnancy and maternity

#### **4.0 Assessing the EIA of the Site Allocations DPD**

- 4.1 The Council has an adopted Core Strategy (October 2012) that sets out the overall quantity of development, the broad areas where they will be located and the scale of infrastructure that will be necessary to support the development. The Core Strategy has already been subjected to an EIA and Sustainability Appraisal (SA) to ensure that it addresses the needs of all sections of the community. The EIA of the Core Strategy identified a significant number of positive impacts on the relevant protected characteristics with no adverse impacts. A copy of the EIA for the Core Strategy can be found on the Council's website ([www.woking.gov.uk](http://www.woking.gov.uk)). The Inspector of the Secretary of State who conducted the Core Strategy Examination was satisfied with its accompanying EIA.
- 4.2 The Site Allocations DPD is an important means to help deliver the Core Strategy and has been prepared to be in general conformity with its requirements. The strategic context within which the Site Allocations DPD is being prepared has already been subject to a satisfactory EIA and SA.
- 4.3 The Site Allocations DPD has been subject to a SA, assessing the environmental, economic and social implications of the proposals of the Site Allocations DPD. Equality issues are a key component of the social objectives assessed as part of the SA. The following social objectives were assessed:
- to provide sufficient housing which meets the needs of the community and which is at an affordable price

- facilitate the improved health and wellbeing of the population and reduce inequalities in health
- reduce poverty, crime and social exclusion
- to improve accessibility to all services and facilities
- maintain high and stable levels of employment and productivity, and encourage high quality, low impact development and education for all

4.4 The SA found that the Site Allocations DPD will either have a positive or neutral impact on the social objectives. Each stage of the DPD process has been assessed to identify the impact it might have on the protected characteristics.

## **5.0 Assessment of the potential impacts of Site Allocations DPD on the relevant protected characteristics**

5.1 The Council has a strict and standard procedure for monitoring the equality impacts of its key decisions. Each report to Council and all other relevant committees such as the Local Development Framework Working Group is subjected to an EIA with a standard template approved by Council to ensure consistency in the assessment across all functions. A copy of the template for assessing the EIA of committee reports is included in Appendix 1. Copies of completed templates can be provided on request.

5.2 The Site Allocations DPD has gone through a number of stages and has been reported to the relevant Committees of the Council with an EIA at each stage, as detailed below. Copies of the committee reports can be obtained from the Committee Service of the Council and on the Council's website.

5.3 Three EIAs have been specifically undertaken to reflect all the key stages of the preparation of the Site Allocations DPD, including the following stages:

- Agreement of work programme for DPD, May 2012
- Draft Site Allocations DPD (Regulation 18 consultation), 18 June 2016 – 31 July 2016
- Publication document (Regulation 19 consultation), 5 November 2018 – 17 December 2018

Furthermore, the Council undertook additional research reports to supplement the decision to consult on Martyrs Lane safeguarded site. The additional evidence base reports include a Landscape Assessment and Green Belt boundary review and a Strategic Transport Assessment. These two documents were considered in the preparation of the EIA for the Publication document, October 2018.

5.4 An assessment of each of the committee reports regarding the various stages of the Site Allocations DPD has confirmed no negative impacts on the relevant protected characteristics. There are neutral effects on a number of the protected characteristics. The Site Allocations DPD will however bring positive equality impacts through advancing the equality of the protected groups of Gypsies and Travellers and older people. The Site Allocations DPD allocates specific sites which will deliver the identified need for Traveller accommodation to 2027 and makes specific provision to meet the needs of the elderly, including allocating a specific site for elderly people's accommodation.

5.5 The Council published a Draft Site Allocations DPD (Regulation 18) between 18 June 2015 and 31 July 2015. A further consultation document was published for consultation between 6 January 2017 and 27 February 2017 on the possibility of substituting the safeguarded sites in the draft Site Allocations DPD with land to the east of Martyrs Lane. For both

consultations effort was made to invite representations from all sections of the community including the hard to reach groups, in accordance with the Council's adopted Statement of Community Involvement. The Council is satisfied that none of the protected characteristics were deliberately excluded or disadvantaged from participating in the process. The Council will publish a Consultation Statement which sets out how the Council has consulted and engaged with stakeholders and the community throughout the preparation of the Site Allocations DPD. The Consultation Document includes a list of individuals and organisations who were consulted at key stages of the Draft Site Allocations DPD preparation.

- 5.6 The Council has continued to communicate and engage with stakeholders and the community for the public consultation of the Publication Document (Regulation 19). Furthermore the Council will continue to monitor the delivery of sites to ensure that any potential issues that could emerge are addressed.

## **6.0 Conclusion**

- 6.1 It is concluded that the Site Allocations DPD will not lead to any adverse impacts or discriminate against any of the protected characteristics. The Site Allocations DPD will lead to the delivery of positive impacts on two protected groups including Gypsies and Travellers and older people through the provision of specific accommodation to meet identified needs. The provision of specialised facilities and open space and green infrastructure would also benefit the young. These actions would advance equality of opportunities and contribute in fostering good relations between different groups and people.
- 6.2 Equalities issues have been taken into account at each stage of the Site Allocations DPD process using the Council's standard EIA template approach to assess the impacts of all of its aspects on the key elements of equality. Furthermore, all sections of the community were given equal opportunity to inform the draft Site Allocations DPD at key stages of its preparation. In particular, if any significant updates arise after the DPD Examination, this report will be updated to ensure any equalities issues are met, and actions will be introduced to address any concerns.
- 6.3 Based on the available information it is not considered that any measures are required to mitigate against any adverse impact a policy may have. Should any significant updates arise as a result of the DPD Examination the Council will update this EIA report to ensure any equality issues are addressed. Furthermore, the Council will monitor the implementation and impact of the Site Allocations DPD against the objectives of the Core Strategy through the production of the Annual Monitoring Report (AMR) and address any issues that could potentially arise in the future.

### Appendix 1: Equality Impact Assessment Template

The purpose of this assessment is to improve the work of the Council by making sure that it does not discriminate against any individual or group and that, where possible, it promotes equality. The Council has a legal duty to comply with equalities legislation and this template enables you to consider the impact (positive or negative) a strategy, policy, project or service may have upon the protected groups.

		Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative how can it be mitigated? (action) <b>THIS SECTION NEEDS TO BE COMPLETED AS EVIDENCE OF WHAT THE POSITIVE IMPACT IS OR WHAT ACTIONS ARE BEING TAKEN TO MITIGATE ANY NEGATIVE IMPACTS</b>
		Eliminate discrimination	Advance equality	Good relations			
<b>Gender</b>	Men						
	Women						
<b>Gender Reassignment</b>							
<b>Race</b>	White						
	Mixed/Multiple ethnic groups						
	Asian/Asian British						
	Black/African/Caribbean/ Black British						
	Gypsies / travellers						
	Other ethnic group						

		Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative how can it be mitigated? (action) <b>THIS SECTION NEEDS TO BE COMPLETED AS EVIDENCE OF WHAT THE POSITIVE IMPACT IS OR WHAT ACTIONS ARE BEING TAKEN TO MITIGATE ANY NEGATIVE IMPACTS</b>
		Eliminate discrimination	Advance equality	Good relations			
<b>Disability</b>	Physical						
	Sensory						
	Learning Difficulties						
	Mental Health						
<b>Sexual Orientation</b>	Lesbian, gay men, bisexual						
<b>Age</b>	Older people (50+)						
	Younger people (16 - 25)						
<b>Religion or Belief</b>	Faith Groups						
<b>Pregnancy &amp; maternity</b>							
<b>Marriage &amp; Civil Partnership</b>							
<b>Socio-economic Background</b>							

The purpose of the Equality Impact Assessment is to improve the work of the Council by making sure it does not discriminate against any individual or group and that, where possible, it promotes equality. The assessment is quick and straightforward to undertake but it is an important step to make sure that individuals and teams think carefully about the likely impact of their work on people in Woking and take action to improve strategies, policies, services and projects, where appropriate. Further details and guidance on completing the form are [available](#).