



# **EQUALITY IMPACT ASSESSMENT**

## **Initial Assessment**

<b>Policy, practice, function or project assessed</b>	Proposed Submission Hart Local Plan: Strategy and Sites (Regulation 19 stage)
<b>Lead Officer</b>	Katie Bailey
<b>Team</b>	Planning Policy
<b>Start date of assessment</b>	1 <sup>st</sup> December 2017
<b>Completion of assessment</b>	19 <sup>th</sup> December 2017

## **A. POLICY, PRACTICE, FUNCTION OR PROJECT TO BE ASSESSED**

### **A1. Please describe what are the main aims, objectives, purpose and intended outcomes of the policy or function?**

An up to date Local Plan is needed to guide development in a coherent and sustainable way, and help co-ordinate the provision of infrastructure in a way that will benefit all communities. The Proposed Submission Local Plan: Strategy and Sites (referred to as 'Local Plan') includes a vision for the district, with the policies in the plan seeking to ensure it is achieved. The Local Plan sets out the key strategic policies and overall strategy for managing and directing future development in Hart until 2032.

The Local Plan seeks to bring forward sustainable growth in housing, employment and other uses, and improve transport options, which will bring benefits to all of the District's communities.

The policies also seek to protect and enhance the built and natural environments which will benefit everyone who lives in, works in, has business in or visits the district.

The Local Plan follows a preparation process set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, which prescribe the required statutory consultation. As a result of previous consultation undertaken under regulation 18 the Council has a duty to consider representations and comments received, and to make any necessary changes to policies in order to make the plan sound. The Council has now considered these representations and will publish the Plan in February 2018 for a period of six weeks under regulation 19. All representations received will then be submitted to the Secretary of State for consideration by an appointed Inspector.

This stage of local plan preparation therefore seeks the views of local communities (including residents, businesses, organisations and public bodies) on the Proposed Submission version Local Plan. Public consultation was undertaken at previous stages of local plan preparation. This equalities assessment builds on the assessment previously undertaken for the Regulation 18 stage, and considers any potential risk the changed policies in the plan may have upon each of the 'protected characteristics' covered under the Equality Act 2010 which are:-

- Age
- Disability
- Gender Reassignment
- Race
- Religion or Belief
- Sex
- Sexual Orientation
- Marriage or civil partnership
- Pregnancy and maternity

It is important to consider who will be affected by the policies aims or by their implementation and to consider only opportunities to actively promote equality that the policies present.

**A2. Is this policy or function associated with any other Council policy or priority?**

The current Local Plan is dated 2006. Saved policies from this plan are used to determine planning applications. The replacement of the 2006 Local Plan will be in two parts; Local Plan: Strategy and Sites and Local Plan: Development Management and other Allocations.

The Corporate Plan lists the adoption of a new Local Plan as a Council priority. The new local plan will in deliver the spatial elements of other policy documents and strategies with links to the:

- Economic Development Strategy
- Hart Housing Strategy 2015-2020
- Green Infrastructure Strategy
- Hart Health and Wellbeing Action Plan
- Hart Leisure Strategy
- Biodiversity Action Plan
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**A3. Who are the intended beneficiaries/stakeholders of the policy or function? How many people are affected and from what sections of the community?**

The impact is district wide. It will have an impact on everyone who lives, works, plays, visits or travels in the District. This includes businesses, local services, Parish and Town Councils, councillors, land owners and developers.

**A4. Is the policy/function corporate and far-reaching?**

The Local Plan is relevant to the whole district, and is corporate in the sense that it has to be adopted by the Council prior to it carrying full weight in the determination of planning applications, and contains the Council's approved policies for the use and development of land in the District.

**A5. Are you expecting to make any significant change to the policy or service in the near future? If so, please give details.**

This is the Proposed Submission Local Plan: Strategy and Sites and could be subject to change until it is adopted. This Equality Impact Assessment scoping assessment form accompanies the Local Plan at Regulation 19 (publication) stage of the process. The plan is therefore subject to change following examination and throughout the process until adoption. It is a requirement of national guidance that the Council has an up to date local plan.

**A6. Is this a new or existing policy or function?**

The preparation of a local plan has been a requirement of national planning policy for a long time, which requires that they are in place and kept up to date.

The Local Plan contains new policies, but the function and role of a Local Plan is not new in the sense that there is an existing Local Plan in place. It was adopted in 2006, from which saved policies are currently being used in the determination of planning applications.

**B. EVIDENCE/ DATA and CONSULTATION**

It is important to consider all information that is available in determining whether the policy or function could have a differential impact. Please attach examples of monitoring information, research or consultation reports.

**B1. What monitoring or other information do you have about relevant target groups, which will show the impact of the policy or function?**

The potential impact of the policy has been considered by:

- Consultation results. The population was notified on Local Plan consultations via leaflets to every household in Hart, email notifications (to those signed up on the consultation mailing list), and four Local Plan exhibitions which were advertised in local papers.
- Sustainability Appraisal which assesses the social, economic and environmental impact of policies and objectives
- Planning applicants/ developers/ agents statistics
- Housing monitoring
- Commercial monitoring
- Future assessments of housing need
- Census and ONS population data – reference has been made to the Hart Equality & Diversity Profile, published annually on the council's website

The Local Plan has been produced following extensive consultation and public participation, which takes into account the views and representations expressed by different community groups, statutory and non-statutory bodies. Therefore, this updated Equality Impact Assessment which builds on the previous version examines whether the proposed changes to the local plan will have any undue impacts on any particular community groups within the District.

Overall the results were generally positive with no adverse effects on protected groups being identified. Particular efforts were made to engage with young people, older people and people from ethnic minorities.

Consultations carried out previously have notified via email groups, organisations and networks that represent harder to reach groups such as Area Social Services, Black Environment Network, Federation of Small Businesses, the National Federation of Gypsy Liaison Groups, and various charities which specialise in helping the needs of those with disabilities.

This version of the Plan is informed by the previous consultation stages as outlined below and evidence studies. In terms of the consultation on the full regulation 18 draft plan all consultees including organizations and individuals on the Council's Local Plan consultation database were e mailed directly and notified on the consultation process. A dedicated Local Plan web page with information on the consultation was made available on the Council's web site. Public 'drop-in' exhibitions were also held at various venues within the District and were publicized through a press release. The following bodies which represent the interest of the protected groups were e mailed directly:

Age Concern Hampshire  
Black Environment Network  
Carers Together Hampshire  
Deaf PLUS South  
Guide Dogs for the Blind  
National Federation of Gypsy Liaison Groups  
Hampshire Coalition of Disabled People  
Hampshire Deaf Association  
Hart Voluntary Action  
Parity for Disability  
Churches Together  
Hampshire & Dorset Branch Three Faiths Forum  
Open Sight

The Gypsy Council

The Policies contained in the Local Plan will be monitored through the Authority's annual Monitoring Report using a range of indicators to assess whether the Objectives are being delivered.

The Local Plan also includes a chapter about monitoring and delivery. Monitoring indicators have been identified for each Objective.

## **B2. Have you compared the data you have with the equality profile of the local population? What does it show?**

In order to examine the effect of the Local Plan on the protected groups in the District a wide range of evidence based studies have been undertaken including demographic reviews of information in order to identify the key issues and needs of the protected groups.

### **Equalities profile**

In the 2011 census the population of Hart was 91,033. The latest official Mid-Year Estimates for 2016 indicate that Hart has a population of 94250 consisting of 46,811 males (49.7%) and 47,439 females (50.3%).

In 2011 16.5% (15,018) of the population was aged 65 and over compared to 12.7% (10,619) in 2001 which represents a 41.4% increase. The Council's Strategic Housing market Assessment (December 2016) forecasts an ageing population with a 34% increase in the 65-74 age group by 2034, and a 221% increase in the 85+ group in the District.

In terms of ethnicity, the 2011 Census shows that 90.7% of Hart's resident population to be of ethnic group 'White British'. It records a relatively small Black and Minority Ethnic (BME) community. These characteristics have changed somewhat over recent years due to a significant increase in the Nepalese and Eastern European communities in Hart and the surrounding area.

At the time of the 2011 Census 273 people (0.3%) in Hart described themselves as being from the Gypsy or Irish Traveller ethnic group. Hart District has two of Hampshire County Council's four authorised permanent gypsy and traveller sites, one at Star Hill, and the other at Penny Hill, both of which have 20 pitches each. In addition to the county owned sites there are two authorised private sites at Crondall and Yateley.

In 2011 0.1% of Hart residents aged 16 or over were in a registered same-sex civil partnership; half the averages for Hampshire and South East England.

In 2014 there were 1,000 live births from mothers whose usual residence is Hart. This is a slight reduction compared to the 1,036 live births in 2014

The 2011 Census provides the most recent data on religion, 64.6% of Hart residents who responded to this question were Christian. The second most common religion in Hart was Hindu at 0.8%. 25.8% of respondents stated they had no religion.

Currently, there is no reliable data on the numbers of Lesbian, Gay and Bisexual (LGB) residents within Hart. However, the 2013 ONS 'Integrated Household Survey' indicated that 1.6% of the UK adult population identified themselves as LGB.

Respondents were also asked to complete an equalities monitoring questionnaire – which was not mandatory in order to help in identifying which of the protected groups have engaged with this consultation.

An analysis of the responses received shows that a total of 1226 individual responses were received with a total of 2313 representations.

A total of 749 of the responses were made online with the majority of the remainder being submitted by e mail or by post.

Of the 613 who responded to gender equalities questions either on line or by completing the equalities monitoring form 323 (52.7%) identified as male and 245 (40.0%) were female; 45 (7.3%) preferred not to answer. This is not representative of the Hart population as according to the 2016 mid-year estimates Hart had a population split of 49.7% males and 50.3% females.

There were 624 responses to the age related category question. The majority 149 were in the 65-74 age group followed by 137 in the 55-64 age group, 111 in the 45-55, 11 in the 18-24, 28 in the 25-34 and 67 preferred not to say. Overall 338 (54.1%) were aged over 55. This is similar to participation figures from previous consultations undertaken relating to the local plan. It does not represent Hart's population as according to 2014 mid-year estimates, 30% of Hart's population is aged 55 and above. Therefore there is a need to attempt to engage with younger residents.

There were 636 responses to the ethnic group monitoring question of which 558 identified as white, 402 of whom identified as White British. Five identified as being of mixed ethnic groups, 2 Asian, 1 a Gypsy and 72 preferred not to reveal their ethnic group. This is generally representative of Hart's population make up where the 2011 Census shows that 90.7% of Hart's resident population to be of ethnic group White British with a small BME community.

Twenty-two (3.8%) of the 579 respondents to the 'do you consider yourself to have a disability?' considered themselves as having a disability, 48 preferred not to answer. This represents an underrepresentation when compared to

The responses to the Housing Options consultation conducted in November 2014 show that 301 (57%) of the respondents were male, 201 (38%) were female, and 26 (5%) would prefer not to say. This is not representative of the Hart population as 49.6% are male and 50.4% are female (2011 Census). 54% of the respondents were aged 55 and above. Again, this does not represent Hart's population as according to 2014 mid-year estimates, 30% of Hart's population is aged 55 and above. Therefore there is a need to attempt to engage with younger residents and ensure that both males and females are involved in responding to consultations. There is also an opportunity in future consultations to ask about ethnicity and disability to compare to the equality profile of Hart to monitor whether a diverse range of people responded.

The Refined Housing Options consultation held between February and March 2016 involved reaching every household in Hart with an information leaflet on the consultation process and how to respond. Documents and response forms were also available at town and parish council offices and libraries across the district as well as the reception at Hart District Council. There were over 4,000 responses from residents, relevant stakeholders and local town and parish councils. Unfortunately, this consultation did not include any equality monitoring questions. However, this was corrected for consultation on the Draft Hart Local Plan consultation (Regulation 18).

### **B3. Have you identified any improvements or other changes that could be made from monitoring the data?**

A wide range of consultation methods were used for the Regulation 18 consultation as outlined in Section B1 in order to achieve wide community engagement. However the response from organizations representing protected groups was limited.

It is considered that wide engagement across a representative cross section of the District at all stages will help to ensure that the policies in the Plan will reflect the needs of people who live and work in the District. Particular care will be taken to ensure that a broad and representative cross section of the District's communities is consulted. There should be follow up to ensure that organizations representing the interests of protected groups are aware of consultation exercises on the local plan and to encourage them to comment and input into the process.

The previous Housing Options consultation (November 2014) held four public exhibitions which were well attended across the District. Feedback from this consultation informs that an increased number of exhibitions should be undertaken to ensure reaching a wider audience. Other methods of engagement were suggested such as focus groups, as well as press releases and advertisements in local newspapers. The Council's website and social media should also be used to advertise.

**B4. Have you consulted or involved external stakeholders about the policy or function? If so, what were their views?**

Yes consultation responses from the duty to cooperate bodies and statutory consultees prescribed in the Regulations were taken into account in the revised Regulation 19 version documents.

Future engagement with the community will include emphasis on targeting harder to reach groups.

Early engagement has taken place for previous consultations. Various external stakeholders are notified to help gain knowledge and feedback in their specialist areas.

**B5. Have you undertaken any consultation with staff to assess their perception of any impacts of the policy or function? If so, what has been learnt from them?**

Regular briefings and meetings are held with local Councillors to continually inform them of the process of the emerging Hart Local Plan. Consultation and liaison has also regularly taken place with other council services, such as Development Control, Housing, Leisure and Countryside services, Environmental Promotion and Health & Wellbeing.

**B6. Please provide information about any other consultation, research, or involvement undertaken in relation to this impact assessment.**

The Local Plan is supported by numerous research studies which have provided the evidence for the policies which can be viewed at <https://www.hart.gov.uk/Evidence-base>

Liaison and consultation was also undertaken by the consultants who produced the evidence base documents.

The plan is supported by a Sustainability Appraisal which also assesses the social, economic and environmental impacts of policies and land allocations. This could highlight any potentially adverse social or economic impacts on protected groups.

A school visit was made in November 2016 to engage with year 4 children in Fleet on 'Where will everyone live?' This visit broadly discussed how and where Hart will provide future housing.

All consultations follow Hart's consultation procedures set out in the [Statement of Community Involvement 2014](#).

**C1. IMPACT OF THE POLICY OR FUNCTION**

Assess the potential impact on each of the equality strands/groups. The impact could be negative, positive or neutral. If you assess a negative impact for any of the groups then

you will need to assess whether that impact is low, medium or high. Refer to the evidence you use.

DESCRIPTION OF IMPACT	Nature of Impact (Positive, Neutral, Adverse)	Extent of Impact (Low, Medium, High)
<b>SEX:</b> Identify the potential impact of the policy or function on men and women		
Policies in the proposed Local Plan will have an impact upon everyone who lives in, works in, has business in, travels through or visits the district. This is expected to impact on people of different genders equally. No negative impacts have been identified resulting from the Local plan objectives and proposed policies.	Neutral	
<b>RACE:</b> A group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.		
<p>The Local Plan policies, proposals and allocations will aim to ensure that sites are available to provide sufficient housing to meet a significant proportion of housing needs of all groups within the district.</p> <p>In terms of housing the Plan supports the delivery of mixed sizes and tenures, including the provision of affordable housing for all groups in need. No specifically negative impacts upon any racial group has been identified.</p> <p>Romany Gypsies and Irish Travellers are legally recognised as ethnic groups, and protected from discrimination under the Equality Act 2010, and the Human Rights Act (1998). Planning to provide sufficient pitches to meet the needs of Gypsies and Travellers is a statutory requirement of Local Authorities under Planning Policy for Gypsy and Travellers guidance that is separate from the NPPF. An accommodation needs assessment has been carried out, which has informed Policy H5 of the proposed submission Local Plan. At present there is a surplus of accommodation, and therefore a criteria based policy is included in the Local Plan, rather than specific targets for provision.</p>	Neutral	

<p><b>DISABILITY:</b> A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p>		
<p>The objectives of Policies H1 and H2 seek to ensure that proposals are accessible and adaptable to people with disabilities e.g. wheelchair accessible homes and public places.</p> <p>Sites and improvements to public spaces will need to be designed to be inclusive for all users, including families, disabled people and the elderly thereby complying with the Equality Act 2010 (Policy NBE10: Design)</p> <p>Retail and leisure facilities are required to be fully accessible and provide disabled car parking (Policy NBE10: Design)</p> <p>Policies facilitating potential new health facilities would ensure that people with disabilities have access to the health facilities they require</p> <p>The purpose of the planning system is to contribute to sustainable development.' (NPPF, para 6). Policies regarding development seek to site growth in areas that are accessible by public transport, or can be made so.</p>	Positive	
<p><b>AGE:</b> Identify the potential impact of the policy or function on different age groups</p>		
<p>The aim of policies H1-H6 of the Submission Local Plan is to ensure that a wide range of housing is developed. This includes housing for certain groups whose needs may otherwise not be met by the market. These age groups may include older people who need care homes or retirement housing (Policy H4: Specialist Housing) and young people and families with children who may need affordable housing if they cannot enter the housing market.</p> <p>The increase in provision and protection of employment land would increase employment opportunities particularly for young people (Policies ED1 and ED2)</p> <p>Increased funding for the provision of community infrastructure including schools, libraries and health facilities which will benefit all ages including young and old (Policy I5)</p> <p>Open space policy I4 will benefit all age groups particularly children through the provision of play areas and facilities.</p>	Positive	

<b>SEXUAL ORIENTATION:</b> Identify the potential impact of the policy on lesbian, gay, bisexual or heterosexual people		
The policies in the Local Plan have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the district. There is no evidence that there will be a negative impact on lesbian, gay, bisexual or heterosexual people.	Neutral	
<b>RELIGION OR BELIEF:</b> Identify the potential impact of the policy on people with different religions or beliefs		
The policies in the Local Plan have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the district.  Policy 15 requirement for the provision of community facilities includes places of worship.  There is no evidence that there will be a differential impact based on region or belief. The Local Plan is for the equal benefit of all.	Neutral	
<b>GENDER REASSIGNMENT:</b> The process of transitioning from one gender to another.		
The policies in the Local Plan will have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the district. No specific negative impacts have been identified relating to people transitioning from one gender to another. The Local Plan is for the equal benefit of all.	Neutral	
<b>MARRIAGE AND CIVIL PARTNERSHIP</b>		
The policies in the Local Plan have an impact upon everyone who lives in, works in, visits, runs a business in, or travels in the district. There is no evidence that there will be a differential impact based on marriage and civil partnership reassignment. The Local Plan is for the equal benefit of all.	Neutral	
<b>PREGNANCY AND MATERNITY</b> Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.		
Given the potential health care and community infrastructure needs of this protected characteristic group, some of the policies such as I5 in the plan will therefore have a positive impact.	Positive	

<b>OTHER – E.g. Carers, Rurality</b>		
Infrastructure improvements and sustainable modes of transport may benefit those living in rural areas. This may have a positive impact in some areas.	Positive	

**PLEASE NOTE: Following completion of the section above, if the nature of the impact is adverse then you may need to proceed to a full equality impact assessment.**

<p><b>C2. Could you minimise or remove any adverse or potential impact that is high, medium or low significance, in advance of a full impact assessment? Explain how.</b></p> <p>The Local Plan is a policy document for the use and development of land and will be used in the determination of planning applications. No impacts have been identified which would have a negative impact on the protected groups.</p>
<p><b>C3. Does the policy or function actively promote equal opportunities and good community relations? Or could changes be made so that it does so?</b></p> <p>Yes – the Local Plan seeks to create sustainable, inclusive and mixed communities, providing employment opportunities, housing and appropriate supporting infrastructure (such as schools and health care) for all.</p>
<p><b>C4. Please provide any further information, qualitative or quantitative that does not fit into the questions but you feel has a likely impact on this assessment.</b></p>

<b>D. CONCLUSIONS</b>			
<b>D1. Was there sufficient data to complete the initial assessment?</b>	Yes?	Y	<b>If “NO”, what arrangements are in place for evidence gathering and continuing with the assessment?</b>
	No?	<input type="checkbox"/>	
<b>D2. Is the outcome of the initial assessment that the policy or function would have an adverse impact (medium or high impact) on one or more target group?</b>	Yes?	<input type="checkbox"/>	<b>If “YES”, will you proceed to a full assessment? If so, what arrangements are in place to carry out the full assessment?</b>
	No?	N	

<b>D3. Is the outcome of the assessment that the policy or function would have a neutral or positive impact on equalities?</b>	Yes?	Y	<b>If “YES”, have you included proposals in the Action Plan to further improve the impact of the policy or function on equalities?</b>
	No?	<input type="checkbox"/>	<p>Policies have been formulated taking into account issues identified in evidence based studies such as the Housing market Assessment and designed to eliminate the risk of discrimination occurring.</p> <p><b>Do you plan to review the service or policy again in future to assess whether there has been any change? If so, when?</b></p> <p>An update of the assessment will be carried out should significant modifications to the Plan be required before or after submission if issues are identified by the appointed Inspector.</p>

<p><b>D4. Do you have any other conclusions/outcomes from the assessment?</b></p> <p>There is no evidence to suggest that any equality group will be disadvantaged by the Local Plan.</p> <p>The intention is that all members of the community have the opportunity to have their say in how landuse planning and development takes place, irrespective of age, sex, ability, ethnicity, background or disability. As part of the Local Plan preparation the Council produced a Statement of Community Involvement (SCI) which was adopted in July 2014 which explains how the Council will engage with the community in the preparation of the Local Plan. In particular, efforts are made to ensure people who traditionally have not been involved with planning policy have the opportunity to have their view heard. Full details of consultation on the Plan and outcomes will be detailed in the Report of Consultation, which is also a statutory requirement of the local plan Regulations and which will be submitted to the Local Plan Inspector alongside the Plan and the Sustainability Appraisal.</p>
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#### **ACTION PLAN for enhancing existing practice**

<b>Recommendation/ issue to be addressed</b>	<b>Planned Milestone</b>	<b>Officer Responsible</b>
Future engagement with the community will always include emphasis on targeting harder to reach groups.	In place	Daniel Hawes, Planning Policy Manager
Include equality monitoring questions in future Local Plan consultation questionnaires.	In place	Daniel Hawes, Planning Policy Manager

Future consultation should include better targeting of organizations representing the rights of protected groups and there should be follow up to encourage engagement in the local plan process.	In place – further work on engagement to be done for the next Local Plan document	

**RESOURCES - Does the above action plan require any additional resources?**

Should be addressed from within existing local plan budget

**ARRANGEMENTS FOR MONITORING - Please give your plans for monitoring the achievement of the above actions.**

Include equality questionnaire in any future consultation exercises to monitor the ethnicity, disability, age and gender of respondents.

The plan is accompanied by a monitoring framework which sets out the key indicators which will inform progress on the plan. An annual monitoring report will also be produced.

The Sustainability Appraisal process is also an iterative process which evaluates the social, economic and environmental impacts of the Local Plan and could point to any potentially negative effects on the protected groups.

<b>Signature of Lead Officer</b>	<i>K. Bailey</i>	<b>Date: 19/12/17</b>
<b>Signature of Corporate Manager or Chief Officer:</b>	<i>D. Phillips</i>	<b>Date:19/12/17</b>