

**Name of activity to be assessed:**

Local Plan Regulation 18 Options  
Consultation Document 2019

**Completing Officer's Name:  
Service Area/Team**

Rachael Thorold

Planning Services; Planning Policy &  
Strategy

**Date Completed:**

18 June 2019

**Quality control:**

**EIA checked by (Name of line manager):**

Tom Ridley

**Date approved:**

24 June 2019

## **Aims and Objectives**

The purpose of an Equality Screening form and Impact Assessment is to improve the work of the Council by making sure that we promote equality and do not discriminate. This ensures that individuals and teams consider the likely impact of their work on residents and take action to improve.

### **What is the main purpose of this strategy/policy/function/project/activity?**

The Council is preparing a new Local Plan which will set out how communities and places within the Borough will develop over the next 15 years. The Local Plan is a statutory requirement and the Government has made it clear that all local authorities must have an up-to-date Local Plan. The Council's current plan was adopted in 2011 and although many aspects of this plan are still highly effective and assisting to bring forward sustainable development in the Borough, the Council's housing target is out of date.

It is proposed that the new Local Plan will contain allocations and designations along with reviewed development management policies which will support the implementation of the Council's preferred development strategy.

The Council must be satisfied that its Local Plan and its preferred development strategy does all it reasonably can to meet the Borough's challenging development needs in a sustainable manner that conforms with current national policy as set out in the National Planning Policy Framework (NPPF).

The next key milestone in the Local Plan programme is to undertake a further regulation 18 consultation in August 2019. This follows the Strategic Options Consultation 2016/17 which identified three options which could form the basis of the development strategy of the new Local Plan.

In light of the Strategic Options consultation 2016 responses, the new National Planning Policy Framework, Planning Practice Guidance in particular the introduction of the new Standard Methodology for calculating housing need, it was considered appropriate to review and re-evaluate the options previously put forward. The review and re-evaluation which has included

additional technical work has led to the identification of five options. This includes the original three options which have evolved and two new options.

The proposed Options Consultation 2019 will form part of the preparation of the Elmbridge new Local Plan. The consultation will share the finding of the review and re-evaluation and present the five options one of which could underpin the new Local Plan's development strategy with our communities and stakeholders.

### **What outcomes do you want from this strategy/policy/function/project/activity?**

By working with our communities and other interested stakeholders we will seek to prepare a new Local Plan that delivers 'good growth' providing much needed new and affordable homes which are supported by appropriate infrastructure and services but also protects and enhances the character and the environment of our Borough.

### **Could the outcome be different if you are from a particular group?**

The Local Plan will be written for all members of the community and not for specific individuals or groups. As a result, it is unlikely to have a disproportionate impact on any particular individual or group.

## **Impact on Specific Groups**

Assess where you think the activity could have an impact on any of the groups.

The Local Plan will have an impact on all those who live and work in the Borough regardless of age, disability or other protected characteristics. No potentially adverse impacts have been identified for any particular group.

The Options Consultation will set out five options for delivering new housing growth in the Borough. The Options Consultation does not identify a preferred option. Each option has been outlined below:

#### **Option 1 intensify urban area**

Option 1 would deliver all the new homes needed in our borough over the next 15 years by:

- Significantly increasing densities on all sites across the urban area; and
- Identifying open spaces, such as allotments and playing fields for redevelopment and relocating these uses within the existing Green Belt.

#### **Option 2 optimise urban area and 3 areas of Green Belt release**

Option 2 would not meet need but would deliver new homes over the next 15 years by:

- Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs.
- Create areas for new homes by removing land from the Green Belt where;  
It is weakly performing the purpose(s) of Green Belt policy;  
It is in a sustainable location for new homes; and  
It is not, or only partially, affected by absolute constraints which prevent development coming forward
- Using the Duty to Co-operate to see if other authorities' can meet some of our need

#### **Option 3 optimise urban land and large Green Belt release**

Option 3 would deliver all the new homes needed in our borough over the next 15 years and would be able to help other boroughs and districts meet their housing need by:

- Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs.
- Creating areas for new homes by removing land from the Green Belt where:
  - It is weakly performing, or it is not essential for the Green Belt policy to work properly,
  - It is being put forward for development by the landowner regardless of strength or importance; and
  - It is not, or only partially, affected by absolute constraints which prevent development coming forward

**Option 4 optimise urban land**

Option 4 would not meet need but would deliver new homes over the next 15 years by:

- Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs.
- Using the Duty to Co-operate to see if other authorities' can meet some of our need.

**Option 5 optimise urban land and small areas of Green Belt release**

Option 5 would deliver all the new homes needed in our borough over the next 15 years by;

- Optimising densities and ensuring effective use of land across the urban area and that new homes are of the right type to meet local needs.
- Creating areas for new homes by removing smaller sub-divided parcels of land from the Green Belt where:
  - It is weakly performing, or it is not essential for the Green Belt policy to work properly; and
  - It is not, or only partially, affected by absolute constraints which prevent development coming forward

The options are unlikely to have a disproportion impact on any particular group because they are not aimed at specific individuals or groups but only at the Borough's future development.

In very general terms the options seek to reduce the adverse impacts on the communities which could result from failing to address development needs (primarily the need for new homes). As such, Options 1, 3 and 5 would meet all housing need therefore would have greatest positive impact. In contrast Options 2 and 4 would fail to plan to meet all housing need which could be considered to lead to a negative impact on all those that live in the Borough should that option be pursued.

Options Consultation	Positive Impact	Negative Impact	No Impact	Reason and justification
Age	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on age issues. However, the Local Plan will likely to include specific policies to meet the accommodation requirements for older people. If such policies are not updated and adopted by the Council, there could be adverse impact on the living conditions of this particular group.

<b>Gender reassignment</b>	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on gender reassignment issues
<b>Marriage and civil partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on marriage and civil partnership issues
<b>Pregnancy and maternity</b>	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on pregnancy and maternity issues. Additional development is likely to lead to an increased demand for key services, particularly health care in this instance. Under each of the Options the Council will be engaging its Clinical Commission Groups (CCG) and other pregnancy & maternity care providers to understand existing pressures and to explore the requirement for any additional services and facilities as a result of new development within the area. Any additional requirements will be identified in the Council's Infrastructure Delivery Plan (IDP) <sup>1</sup> .
<b>Disability</b> <i>Defined as - if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities e.g. you may need someone to help you or you use a piece of apparatus.</i>	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on disability issues. The consultation document highlights the opportunity for the Local Plan to incorporate policies to ensure good design is imbedded within new developments. This can help to ensure that new development delivers high quality and healthy living environments and future accommodation is adaptable.

<sup>1</sup> The Infrastructure Delivery Plan (IDP) identifies the Borough's infrastructure requirements including social, physical and green infrastructure. The IDP sets out what is needed, where it is needed and when it is needed. It then provides an update on the delivery of the required infrastructure to date. Each infrastructure type is accompanied by an Infrastructure Delivery Schedule table which provides further detail on delivery, funding sources, costs and identifies whether there are any funding gaps.

<b>Race</b> <i>Including colour, nationality (including citizenship), ethnic or national origins</i>	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on race issues. However, the Local Plan will likely to include specific policies to meet the accommodation requirements for Gypsy, Roma and Travellers. If such policies are not update and adopted by the Council, there could be adverse impact on the living conditions of this particular group.
<b>Religion, belief or lack of religion/belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on religion, belief or lack of religion/ belief issues
<b>Gender</b>	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on gender issues.
<b>Sexual orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	✓	It is not considered that this Option Consultation Document and the five options will impact on sexual orientation issues

Please provide details of any other impacts on other groups, for example:

- those living in deprived areas
- those facing exclusion
- households on low incomes
- young people in transition to adulthood
- those with low education achievement
- vulnerable workers
- those with barriers to employment
- vulnerable and isolated older people
- carer's and ex-offenders

The Local Plan will an impact on all those live and work in the Borough. No potentially adverse impacts have been identified for any other group.

The Options Consultation seeks ways to address local development needs, primarily the significant increase in the need for new market homes and affordable homes (provided for specified eligible households whose needs are not met by the market).

It is acknowledged that the building of more housing on its own is unlikely to significantly bring down open market house prices and rental prices, as this is influenced by factors beyond simple supply and demand. However, the Local Plan can bring forward policies that ensure that future homes are of the size that is locally needed. This will create more choice, with smaller units ultimately commanding lower purchase or rental prices than larger homes.

**If you have indicated that there is a negative impact on any group, are these of a high impact?**

	<b>Yes</b>	<b>No</b>
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<p><b>High Impact?</b> i.e. it is discriminatory against one or more groups</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Comments</p>		

**Conclusion and next steps**

The purpose of this stage in the Equality Impact Assessment (EqIA) process is to undertake an initial screening exercise of the potential impact, either negative or positive, on specific resulting from the Options Consultation Document and the five options.

The consultation document and the five options were not considered to have a high and/ or negative impact on the equalities groups and therefore it has been necessary to progress to Part 2 Full Assessment.

Alongside the responses to the Local Plan: Strategic Options consultation 2016, the previous Local Plan: Strategic Options Consultation; our Local Plan Evidence Base; and sustainability appraisal, the EqIA process will aid the Council in making the decision as to which option is most appropriate.

At this stage, a more detailed EqIA will be undertaken of the preferred strategic approach (regulation 19 'draft plan) as additional details in terms of the amount, type and location of planned future development will be known. In addition, other draft policies will be considered in light of the EqIA process.

Specifically, it is likely to include specific policies to meet the accommodation requirements for older people, Gypsy, Roma and Travellers. If such policies are not update and adopted by the Council, there could be adverse impact on the living conditions of those particular groups.

To conclude, it is considered that the Options Consultation Document will not unlawfully discriminate against any group or individual or provide the grounds for such discrimination.

**Next Steps**

If the impact is high and/or of **negative impact** then a full assessment is required, please complete parts 2 and 3 on the following pages of this form.

If a full impact assessment is **not required**, then you should not complete parts 2 and 3 of this form.