

North Somerset Council

**Sites and Policies Plan Part 2
Site Allocations Plan
2006-2026**

Publication Version

**Equality Impact Assessment
(EqIA)**

This publication is available in large print,
Braille or audio formats on request.

Help is also available for people who require council information in languages other than English.

Please contact 01934 426 816

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Equality Impact Assessment: Summary Statement

Name of the policy being assessed:

Sites and Policies Plan Part 2: Site Allocations Plan

Date of assessment

October 2016

Lead contact details

Graham Quick

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Others involved in the assessment, including members of staff, the community, stakeholders or elected members

Anthony Rylands – Access Officer for Disabled People

What are the intended aims of the policy?

To identify sites for housing, employment and leisure, social and community uses.

Who is intended to benefit from the policy?

The Sites and Policies Plan Part 2: Site Allocations Plan contains district wide site allocations for housing, employment and community uses. It's aim is to direct growth until 2026 to the most sustainable locations to the benefit of the population of North Somerset.

Service head sign off

Name: Michael Reep, Planning Policy Manager

Date:

1. Assessing relevance

Please assess the relevance of your policy on the following areas of equality. You should consider:

- Both positive and negative impacts
- Any barriers people may experience in accessing services
- How the policy is likely to affect the promotion of equality
- Knowledge of customer experiences to date
- It is not enough to state 'N/A' in this section, a more in-depth explanation is required to demonstrate if/how each area is relevant.

Equality area	Relevant? Yes/No	Reason
Age - Old and young	Yes	Environmental barriers may constrain access by elderly people in terms of location of development and ability to access services/public transport etc.
Disability	Yes	Environmental barriers may constrain access by disabled people in terms of location of development and ability to access services/public transport etc.
Marriage or Civil Partnership	Yes	Site Allocations Plan contains policies regarding community uses which include places of worship or registry offices
Pregnancy or women on Maternity Leave	Yes	Site Allocations Plan contains policies regarding community uses which include health facilities and early-years care
Race - Including Gypsies and Travellers	No	ORS have been commissioned to undertake a new Gypsy and Travellers Survey for North Somerset taking into account the new definition. This assessment will cover the period 2016 – 2036. ORS will have finished the assessment by the end of 2016 and the results of this will feed into the North Somerset Local Plan 2018 – 2036.
Religion and Belief	Yes	Site Allocations Plan contains policies regarding community uses which include places of worship
Sex	No	The Site Allocations Plan is a land-use plan.
Sexual Orientation	No	The Site Allocations Plan is a land-use plan.
Transgender	No	The Site Allocations Plan is a land-use plan.
Other areas, if relevant consider: - Carers - Socio-economic disadvantage - Parents - Location - People living in rural areas - Ex-offenders - Service or Ex-service personnel and their families	Yes	The plan addresses rural living and the rural economy

The remainder of your assessment should focus only on the areas that you have answered ‘yes’ to in the table above.

2. Information and Evidence

Under the Equality Act 2010 we are required to carry out an ‘**analysis of the effects on equality**’ of all of our policies. To enable this analysis it is important that each area has relevant equality information. This can be national, local or service specific information.

a. Which equality areas do you routinely monitor?

The collection of equality information across our services is essential to enable us to understand the effect of our policies on equality groups. Please indicate the information collected in this policy area:

Age	Yes	Carers	Yes	Disability	Yes
Location	Yes	Marriage or Civil Partnership	Yes	Parents	Yes
Pregnancy/Maternity Leave	No	Race	Yes	Religion or belief	Yes
Sex	Yes	Sexual Orientation	No	Socio Economic	Yes
Transgender	No	Other area, please specify:			

b. What data, research and other evidence or information is available which is relevant to this EqIA?

If relevant you can include: quantitative/qualitative research, national reports, results from recent consultations, information from stakeholders, findings of recent inspections etc.

The main data source used is the 2011 Census.

c. What further data or information do you need to gather during the course of the policy development?

None in respect of the Site Allocations Plan. Further consultation may be undertaken at the planning application and implementation stage.

3. Engagement

When completing an EqIA you should be mindful of the council's obligation to publish the results of its engagement activity. It is a statutory requirement and therefore a core element of the EqIA. Engagement may be one-off or repeated over a longer period of time. It may be formal or informal. It may be focused on a specific issue or on service delivery or workforce issues. This section can reference previous engagement activity or any work done specifically during the policy development.

a. Have those affected by this policy been consulted?

Briefly describe what you did, with whom, when and where. You should list the methods of consultation used. Please outline a brief summary of the responses gained and links to relevant documents, as well as any actions.

Consultation on the draft plan took place from February to April 2013. Further consultation took place on a revised draft in March 2016. Comments received from the March 2016 consultation have been reflected in the revised policies in the Publication version of the plan. Further details of the consultation are in Appendix A.

4. Conclusions and mitigating action

Please review the information you have identified or collected through this assessment and indicate if any differential impacts exist. Importantly you should also consider what changes or actions you need to take to mitigate any negative impacts that have been identified.

a. What does the information you have gathered through monitoring and engagement tell you?

The Site Allocations Plan is considered to have an overall positive impact on the groups considered.

b. What course of action will you take as a result of this EqIA?

When considering your actions please be mindful of the council's general duties under the Equality Act 2010.

- To eliminate unlawful discrimination, harassment, victimisation
- Advance equality of opportunity between persons who share a protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and persons who do not

The information in this section should focus on practical actions that can be taken to improve the outcomes for equality groups.

The Site Allocations Plan is considered to have an overall positive impact on the groups considered. In terms of practical actions that can be taken

to improve the outcomes for equality groups these will be considered when the sites identified in the plan come forward for development at the more detailed planning application/delivery stage through masterplanning, design of buildings, accessibility of services etc.

c. Final assessment of impact

Following this assessment please assess the likely level of impact of the policy/or proposals on the equality groups included within this assessment.

High		Medium		Low	X
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5. Monitoring

To demonstrate achievements and to avoid challenge you need to identify what mechanisms are in place to review actual impacts or to monitor progress against the actions set within this assessment. Please indicate how you will monitor the results of this assessment.

Please tick as appropriate

Action	Yes/No	If yes, date:
Review of this EqIA	Yes	In line with next stages of consultation/examination/adoption.
Incorporated into project reviews/reports	Yes	In relation to delivery of development, i.e. detailed planning applications
Service/Team plan reviews	Yes	In relation to the delivery of individual projects; timescales will depend on project delivery. In addition, through annual monitoring of the Core Strategy.
Analysis of customer feedback	Yes	In relation to specific projects where appropriate
Citizens Panel	Yes	Informs Core Strategy monitoring including Annual Monitoring Report
Staff survey	No	
Inspection reports	No	
Regular reports to Corporate Management Team	Yes	Annual Monitoring Report
Regular reports to elected members	Yes	Annual Monitoring Report
Other, please specify:	No	

6. Publishing this assessment

In order to demonstrate transparency in our policy development this assessment should be made available to the public and stakeholders through the most appropriate means. For example through the website, a section within the policy document, and through committee reports.

Please send a copy of the completed assessment to the Equality and Diversity Team.

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Procurement and partnerships

Consideration of external contractor obligations and partnership working

Is the work associated with this policy due to be carried out wholly or partly by contractors? If yes, you need to include equality considerations into the contract.

Specifically you should set out how you will make sure that any partner you work with complies with the Equality Act 2010, the integral public sector duties and how you will monitor this. A reminder of the public sector duties:

- To eliminate unlawful discrimination, harassment, victimisation
- Advance equality of opportunity between persons who share a protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and persons who do not

The Equality Act 2010 also states:

A person who is not a public authority but who exercises public functions must, in the exercise of those functions have due regard to the public sector duties'.

You will need to think about:

- pre-qualification and approval of preferred suppliers
- tendering and specifications
- awards process
- contract clauses
- monitoring and performance measures

Please set out what steps you will take to build into all stages of the procurement process the requirement to consider equality.

N/A

CHAPTER 1: Introduction

Background to the Equality Impact Assessment

This report sets out the results of the Equality Impact Assessment (EqIA) of the North Somerset Sites and Policies Plan Part 2: Site Allocations Plan ('Site Allocations Plan'). Given continuing uncertainties over, in particular, new housing allocations to meet the increased housing requirement, the Site Allocation Plan was significantly delayed. However, now that the Core Strategy housing target has been confirmed as 20,985 dwellings 2006–2026 this allows the Council to proceed towards adopting the Sites and Policies Plan Part 2: Site Allocations Plan. re-examination of remitted policies.

The purpose of the Site Allocations Plan is to identify the detailed allocations required to deliver the North Somerset Core Strategy, consistent with government guidance. This will include a review of existing and the identification of new allocations covering, for example, residential and employment uses, as well as designations to safeguard or protect particular areas such as local green space or strategic gaps. This is proposed to be the Publication Version which is the Council's intended final form of the document before submission to the Secretary of State for examination. The document will be subject to consultation and the responses will be forwarded to the Inspector as part of the formal submission process.

The purpose of the EqIA is to highlight the likely impact of the Site Allocations Plan on different community groups, and how the needs of such groups have been taken into account in relation to the development of the policies.

The need for an EqIA to be undertaken stems from the duty placed on public authorities to eliminate unlawful discrimination in carrying out their functions, and promote equality of opportunity between men and women, different racial groups, and other equality groups.

Public authorities are specifically required to undertake an EqIA under the Race Relations (Amendment) Act 2000 and the Equality Act 2010. The council's Equalities Scheme also highlights the importance of maintaining equality in the delivery of services.

The Sites and Policies Plan Part 2: Site Allocations Plan

The Publication Version of the Site Allocation Plan brings forward the detailed site allocations which complement the strategic context set out in the Core Strategy. The Core Strategy was the subject of its own EqIA and addresses equality issues at the strategic scale; the Site Allocation Plan conforms to the general approach set out in the Core Strategy.

The Site Allocations Plan underwent its first round of consultation in February 2013. The consultation ran from 26 February 2013 until 19 April 2013.

Since the consultation period finished in April 2013 the council has been dealing with a period of uncertainty in terms of its strategic planning framework due to a legal challenge to Policy CS13 (Scale of New Housing) of the Core Strategy resulting in a High Court Challenge and subsequent re-examination of this policy.

The process of re-examination of the remitted Core Strategy policies delayed progress of the Sites and Policies Plan. Given continuing uncertainties over new housing allocations to meet the increased housing requirement, the Development Management policies are taken forward in advance of the remainder of the site allocations. The Development Management Policies Plan was adopted in July 2016.

The site allocations plan is now following on and consultation on the Consultation Draft ran from Thursday March 10th 2016 until Thursday 28th April 2016. There were 264 respondents to the consultation who made 785 individual comments

The comments received have been considered and where appropriate changes to the plan have been made. This is called Publication Version which is the council's proposed final version of the document before submission to the Secretary of State for examination. The document will be subject to consultation in November 2016 with all representations received forwarded for the Inspector's consideration.

The Consultation Draft Sites and Policies Plan was the first public stage of developing the final version for adoption. This was produced following considerable community consultation, the collection of evidence and working with key partners including community groups, local agencies and developers/agents. Community engagement in the preparation of the Sites and Policies Plan has taken place in the form of meetings with town and parish councils. Community views have also been fed into plan preparation by councillors sitting on the council's Strategic Planning and Economic Development Policy and Scrutiny Panel.

Currently it is proposed that the Site Allocations Plan will be formally submitted to Government in December 2016 and the 'soundness' of the document will be considered by a Government-appointed independent Inspector at a subsequent Examination. This EqIA will be submitted alongside the Site Allocations Plan at that stage, updated as necessary.

The Structure of this Report

Following this Introduction, Chapter 2 sets out the approach that has been taken in preparing this report. This Chapter outlines which key equality groups have been focused upon when considering the impacts that the policies within the Site Allocations Plan may have.

Chapter 3 sets out the updated screening matrix of the amended and new individual policies within the Site Allocations Plan to ascertain whether they are likely to have an adverse impact on any of the equality groups which are being considered.

Chapter 4 analyses the outcomes of the screening matrix and whether any of the policies need to be assessed further.

Chapter 5 sets out the consultation process involved in preparing the Site Allocation Plan.

Within the final chapter (Chapter 6), recommendations have been made for monitoring the impacts of the Site Allocations Plan on different equality groups. This chapter also identifies lessons learnt from developing the Site Allocations Plan which should be carried forward when preparing other Development Plan Documents to ensure that unlawful discrimination is eliminated and equality is promoted.

CHAPTER 2: The Approach to the Equality Impact Assessment

This EqIA follows the structure as set out in the council's guidance as well as drawing on guidance from the Improvement and Development Agency for Local Government (IDeA).

Consideration has also been given to guidance from the Planning Advisory Service (PAS), *Equality and Diversity: Improving planning outcomes for the whole of the community* (September 2008).

Initial Screening

IDeA recommends that initial screening needs to take place for all policies, strategies, procedures and functions. This will determine whether or not it is necessary to carry out a full Equality Impact Assessment for this area of work with the key question being '*does the Site Allocation Plan have the potential to cause adverse impact or discriminate against different groups in the community?*'

Due to the broad locational scope of the Site Allocation Plan, there may be potential for it to cause adverse impact or discriminate against different groups in the community. It is therefore considered appropriate for an EqIA of the Site Allocations Plan to be carried out.

Scoping and Defining

IDeA recommend that different perspectives and experiences are used in undertaking the EqIA. The ideal is that those responsible for delivering the strategy are involved and others with technical expertise or with specialist knowledge are involved where appropriate.

This EqIA and report has therefore been led by officers from the Planning Policy Team who are responsible for preparing the Site Allocations Plan. The specialist knowledge of the council's Equality and Diversity Team has also been utilised where appropriate.

Information Gathering

What information do you have that demonstrates this impact?

It is necessary to identify sources of information which will be used to assist in the determination of whether the Site Allocations Plan is likely to have an adverse impact or discriminate against different groups in the community. IDeA identifies that sources of information could include Census data and national and local statistics. Guidance from the PAS however, recognises that local authorities need to go beyond Census data as it does not capture recent demographic changes and sheds little light on the needs, experiences and aspirations of local groups in relation to the built environment.

In aiding the development of this report and undertaking of the assessment the following sources of information have therefore been used and are referred to where appropriate:

- Census data (2011)
- National and Local Statistics
- Mosaic data
- Customer Insight: A portrait of diversity in North Somerset 2010
- Indices of Multiple Deprivation 2010
- North Somerset Gypsy and Traveller Accommodation Consultation 2011
- North Somerset Sustainable Community Strategy 2008 - 2026

Using the information gathered from the sources listed above, Table 1 provides some base-line information on the different groups focused upon in this assessment. These groups are identified in the Equality Act 2010. The groups and target areas include:

- Age
- Sex
- Disability
- Gender Reassignment
- Race
- Religion and Belief
- Sexual Orientation
- Marriage and Civil Partnership
- Pregnancy and Maternity

These groups are not homogeneous and people within these groups have different and individual needs. For this reason the assessment also focuses upon low income groups as it is known by the council that there are certain groups within the district who experience relative levels of deprivation in comparison to other communities within North Somerset.

The following section of this report (Chapter 3) screens each of the Site Allocations Plan policies against the groups identified in Table 1. If it is identified through the screening exercise that a policy may adversely impact upon a particular equality group a full assessment would be required. This has been considered in Chapter 4 of this report.

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Table 1: Baseline data for each equality group

Equality Group	North Somerset Summary
Age	<p>The population of North Somerset at the 2011 Census was 202,566, an increase of 14,002 (7%) from the 2001 Census figure of 188,564.</p> <p>The age breakdowns from the 2011 Census for North Somerset are 35,799 aged between 0-15 years, 123,281 people of working age and 42,633 older people (65+ years).</p> <p>Currently older people make up 21% of North Somerset's population compared to 16.5% of the population nationally. The coastal towns have higher than average proportions.</p>
Disability	<p>The 2011 census gives a headline figure of disabled people¹ comprising 19% of the North Somerset population, 38,740 people.</p>
Sex	<p>The 2001 Census identifies that within the district there are slightly more females (51.4%) than males (48.6%). This reflects the regional and national position.</p>
Race	<p>North Somerset has a low proportion of people from black and other minority ethnic groups. At the time of the 2011 Census the black and minority ethnic population made up only 2.7% of North Somerset's population compared to 4.6% of the South West area and 14.6% of the population in England.</p> <p>In 2009 there were 39 Gypsy and Traveller families living in caravans that permanently reside in North Somerset. These are distributed between 7 on council owned sites and 32 on privately owned, usually owner-occupied, pitches.</p>
Religion and Belief	<p>There is very little information available relating to the religions and beliefs of the North Somerset population. The 2011 Census says that 1.5% of North Somerset positively profess a religion other than Christianity (61%), or no religion (37.5%).</p>
Sexual Orientation	<p>There is limited data relating to the sexual orientation of the North Somerset population, although the 2011 Census reports that 1,076 residents of North Somerset aged 16+ are part of a same sex couple.</p>
Income and deprivation	<p>As a whole North Somerset is a relatively affluent area. However, around 10% of North Somerset's population live in areas that are amongst the most deprived 20% of areas in the country. All of the 19,467 people affected live in Weston-super-Mare.</p>

¹ The figure taken here to represent 'disabled' includes those who answered the 2011 Census question relating to limiting long term illness as 'day to day activities limited a lot' and 'day to day activities limited a little'.

	<p>North Somerset has the 11th largest range of inequality in terms of deprivation. This means that North Somerset has areas that are very deprived (in the bottom 2% of areas nationally) as well as areas that are very prosperous (in the top 2% of areas nationally).</p> <p>The amount of people who defined themselves as unemployed at the time of the last Census was 4,350 people, 3% of the working age population of the district.</p>
Gender Reassignment	There is very limited data relating to Gender Reassignment in North Somerset.
Marriage and Civil Partnership	The Census shows that 54% (87,151 people) of adults in North Somerset were married, re-married or in a same sex civil partnership in 2011.
Pregnancy and Maternity	ONS mid-year statistics recorded 2,300 live births in 2008-2009 in North Somerset. The ONS collates information on the country of origin of women giving birth in England. This data from 2007 shows that 9.2% of births in North Somerset were by mothers born outside the UK. This is lower than the figure for the South West (12.6%) and far lower than for England (24%).

CHAPTER 3: Screening the Site Allocations Plan Policies

What is the potential impact on diverse groups?

The Site Allocation Plan contains 13 different policies and five schedules which allocate housing, employment, Local Green Space and Community Uses. The strategic vision and objectives are set by the Core Strategy. To understand the specific impact of the Site Allocations Plan it is therefore necessary to examine the individual policies and schedules.

Table 2 outlines the key characteristics of each individual policy within the Site Allocation Plan and considers whether there is the potential for the policy to have an impact on each of the groups identified in Chapter 2.

The key below identifies the symbols used to summarise the impact on a group it is considered each policy will have.

Symbol	Likely Impact
+	Positive
0	Neutral
-	Negative
N/I	Not Identifiable

Table 2: Initial Screening Matrix

Sites and Policies Plan policy	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
Policy SA1: Settlement Boundaries	0	0	0	0	0	0	0	0	0	0	This policy is to ensure that development is directed to towns and settlements to prevent sprawl into the countryside. This encourages sustainable development which improves the social conditions in an area. No specific impacts on equality groups have been identified.
Policy SA2: Housing Allocations	0	+	0	+	0	0	0	0	+	+	Housing allocations are focused in the main towns and service villages in North Somerset. This may have a positive impact on certain groups as focusing housing development in these locations will sustain services meaning access to facilities will be easier.
Policy SA3: Mixed Use Allocations	0	+	0	+	0	0	0	0	0	+	Housing allocations are focused in the main towns and service villages in North Somerset. This may have a positive impact on certain groups as focusing housing development in these locations will sustain services meaning access to facilities will be easier.
Policy SA4: Employment Allocations	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	At this stage it is not possible to identify a direct impact on any of the equality groups. Further EqIAs may be necessary for more detailed policies or at the implementation stage.
Policy SA5: Safeguard Employment Sites	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	At this stage it is not possible to identify a direct impact on any of the equality groups. Further EqIAs may be necessary for more detailed policies or at the implementation stage.

Sites and Policies Plan policy	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
Policy SA6: Retention of economic uses	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	At this stage it is not possible to identify a direct impact on any of the equality groups. Further EqIAs may be necessary for more detailed policies or at the implementation stage.
Policy SA7: Local Green Space	0	0	0	+	0	0	0	0	+	0	Allocates particular areas of beauty, wildlife value and recreation to be protected. This may have a positive impact on some groups as it protects area for walking and exercise which benefits all ages, protects play areas for children benefiting parent and children.
Policy SA8: Undesignated green space	0	0	0	0	0	0	0	0	0	0	At this stage it is not possible to identify a direct impact on any of the equality groups. Further EqIAs may be necessary for more detailed policies or at the implementation stage.
Policy SA9: Strategic Gaps	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	At this stage it is not possible to identify a direct impact on any of the equality groups. Further EqIAs may be necessary for more detailed policies or at the implementation stage.
Policy SA10: Community use allocations	0	0	0	0	0	0	0	0	0	0	This policy has a neutral impact on Equality Groups.
Policy SA11: Weston Regeneration Area	0	0	0	0	0	0	0	0	0	0	This policy has a neutral impact on Equality Groups.
Policy SA12: A370 Corridor into Weston-super-Mare	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	At this stage it is not possible to identify a direct impact on any of the equality groups. Further EqIAs may be necessary for more detailed policies or at the

Sites and Policies Plan policy	Equality Group										Impact
	Race	Disability	Sex	Age	Religion and Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partners	Pregnancy and Maternity	Income and Deprivation	
											implementation stage.
Policy SA13: Safeguarded park and ride site, Weston-super-Mare	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	N/I	At this stage it is not possible to identify a direct impact on any of the equality groups. Further EqIAs may be necessary for more detailed policies or at the implementation stage.

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CHAPTER 4: An Assessment of the Site Allocation Plan

The screening of the Site Allocation Plan policies in Chapter 3 has identified that the majority of the policies within the Plan are likely to have either a positive or neutral impact on the defined equality groups. The groups that benefit most from the policies are age, disability and low income groups. The policies tend to favour these groups due to the demographic make-up of the district (as set out in Table 1) and the evidence base which supports the need to address the requirements of these groups. The main impacts for these groups are summarised as follows:

Age:

Positive impacts

- Locating the majority of development towards areas where there are already a range of services and facilities – this will assist those with poor transport accessibility.

Disability:

Positive impacts

- Locating the majority of development towards areas where there are already a range of services and facilities – this will assist those with poor transport accessibility.

Low income and deprivation:

Positive impacts

- Locating the majority of development towards areas where there are already a range of services and facilities – this will assist those with poor transport accessibility.
- Providing opportunities for appropriate small-scale additional development in villages – to help counteract some of the effects of rural deprivation.

Race or Ethnicity:

- No significant negative or positive benefits.

Sex:

Positive impacts

- Locating the majority of development towards areas where there are already a range of services and facilities – this will assist those with poor transport accessibility i.e. women without a car.

Pregnancy and Maternity:

Positive impacts

- Locating the majority of development towards areas where there are already a range of services and facilities – this will assist those with poor transport accessibility i.e. women with young children without a car.

Religion and Belief:

- No significant negative or positive benefits.

Sexual Orientation:

- No significant negative or positive benefits.

Gender Reassignment:

- No significant negative or positive benefits.

Marriage and Civil Partnership:

- No significant negative or positive benefits.

All groups will benefit from the Site Allocations Plan through the provision of a broader mix of housing, more jobs and improved access to services and facilities. No negative impacts have been identified and no further assessment is considered necessary at this stage.

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CHAPTER 5: Consultation

Have those affected by the Site Allocations Plan been consulted?

The policies in the Site Allocations Plan have been developed in partnership with a number of consultees and key stakeholders through consultation exercises and continued community involvement. This process will continue through the remaining stages to adoption. It has included the opportunity to comment on the provisional conclusions of this EqIA.

The purpose of this chapter is to focus upon how the Site Allocations Plan has drawn upon other plans and strategies and background documents and how these take into consideration the particular needs of various equality groups within the district.

Drawing on Plans, Strategies and Other Background Evidence

The Site Allocations Plan draws on information contained within policies and strategies across a wide range of services. The policies are grouped together to reflect the themes set out in the North Somerset Sustainable Community Strategy 2008 - 2026. Developed by the North Somerset Partnership, the Community Strategy sets out the priorities for the district which have been developed through ongoing dialogue with the community and reflects their desires and wishes.

Members of the North Somerset Partnership include volunteers from the private, public and community sectors with the Sustainable Community Strategy taking into consideration the priorities and strategies of these organisations where appropriate.

The Site Allocations Plan has also been informed by other evidence and key data relating to particular community groups within the district. For example, the West of England Strategic Housing Market Assessment (SHMA) sets out statistical information and recommendations relating to the housing needs of various community groups in the West of England. This includes the housing needs of concealed households (which tend to be young adults); households with support needs; older person households; black and minority ethnic households; Gypsy and Traveller households; student households; and low economic households.

Additional information focusing on particular community groups within the district have also been provided via the Housing Strategy (2010-2015) and the Gypsy and Traveller Accommodation Consultation 2011.

CHAPTER 6: Summary

What are the key messages that you need to communicate about the impact of the Site Allocations Plan policies?

The Core Strategy was subject to an Equality Impact Assessment in February 2011. This comprised a screening of the individual policies to identify any adverse impacts on any of the equality groups assessed. An assessment of the draft Sites and Policies Plan has been undertaken using the same approach and this will help to inform the consultation process. The EqIA will be revisited and refined as the document progresses through its statutory stages.

This EqIA has examined whether the Site Allocations Plan and the associated consultation arrangements will cause / have caused adverse impact or discriminated against different groups in the community. The assessment has revealed that the policies in the Site Allocations Plan are likely to have a neutral or beneficial impact on the equality groups within the district. There are other policies which may appear to favour and target certain groups however, justification for this emanates from the council's evidence base, the consultation undertaken and the framework provided by Government guidance. As identified as part of this EqIA process, these policies aim to take positive action in targeting and meeting local needs and creating a 'level playing field' in the access to services. Indeed, the overall Plan will contribute directly and indirectly to the delivery and accessibility of new homes, schools, employment opportunities and infrastructure facilities. All groups will benefit through the provision of more housing, more jobs and improved access to services and facilities.

What course of action could we take to mitigate the impact identified? Is the course of action justifiable?

Based on the judgements made it is not considered that any measures are required to mitigate against any impact a policy may have. Relatively few negative impacts have been identified and no further assessment is considered necessary at this stage. The negative impacts are not considered discriminatory: they do not rule out classes of development to meet local need but steer them away from areas where past development has given rise to problems or where it would conflict with the approved spatial strategy for the district.

Further EqIAs may be required where this assessment has not been able, at this stage, to identify impacts because the proposals are at a relatively high level. This is the case with many of the site allocations, where design issues and the precise distribution of uses remain to be resolved.

Are there plans to monitor the impact of the Site Allocations Plan policies?

The council prepares an Annual Monitoring Report (AMR) each year and submits it to the Secretary of State on or before 31 December. One of the key functions of the AMR is to monitor policies contained within local development documents and to report on their performance. To assess the performance of the Site Allocations Plan, a monitoring framework will be prepared once the policies are refined after consultation. This will set out the key indicators. Where policies are not performing as intended, the AMR will suggest the actions that need to be taken to address the issues. These can, if necessary, include a formal review and subsequent amendment to the policy.

Lessons Learnt

In preparing future Development Plan Documents the lessons learnt from preparing the Site Allocations Plan and this EqIA should be taken into consideration. It is therefore advised that:

- The EqIA is started at the beginning of the Plan production process to ensure the impacts on equality groups are considered throughout policy formulation and consultation.
- More imaginative consultation techniques should be used to access and consult with the groups identified in the Equality Act 2010 to ensure an inclusive and robust consultation and assessment of the policies.
- Alternative formats of the document are readily available and clearly promoted. This could be done by setting out at the start of the document that it is available in large print, Braille, audio formats and languages other than English. This should also be included in all consultation correspondence.
- The EqIA is reviewed by a number of relevant officers within the council who have specialist knowledge or who can provide an overview of the EqIA procedure.

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APPENDIX A: Consultation.

Sites and Policies Consultation Draft – February 2013

Targeted consultation on a draft of the EqIA took place during April/May 2013.

The draft was circulated to the following organisations:

- Avon Consortium for Traveller Education Services
- FaithNet South West
- Somerset Racial Equality Council
- Vision North Somerset

The communication with the Somerset Racial Equality Council was returned as undeliverable. Further investigation revealed that the organisation is defunct.

Comments were received from Vision North Somerset as follows:

- DM5 + DM6: Further consideration may be needed for individual plans when they are bought forward – disabled access is not necessarily exempt. Also consider access to information.
- DM22 + DM23 + DM27: When developments take place with public transport ensure that sensory loss issues are considered as well as physical disabilities. Access to information such as large print timetables is also important.
- DM32: Ensure access for people with sensory loss as well as physical disabilities is also considered.
- DM64 + WSM7 and others: When developing employment and social opportunities bear in mind that shared space is not accessible for blind and partially sighted people.

Site Allocations Plan Consultation Draft – March 2016

The consultation was carried out in accordance with the North Somerset's Statement of Community Involvement (SCI). The SCI outlines that the Council is committed to effective community engagement, and seeks to use a wide range of methods for involving the community in the plan making process.

North Somerset Council's Statement of Community Involvement was adopted in March 2015. This replaces the former SCI which was adopted in February 2007 and needed updating because of changes in planning legislation and increased use of electronic communication in the planning process. This revised Statement of Community Involvement (SCI) sets out how the Council will involve the community and stakeholders in the preparation, alteration and review of local planning policy and the consideration of planning applications. The SCI proposed that the consultation methods and those engaged would vary according to the purpose of the consultation and the bodies or persons who the council were keen to involve

The Consultation Draft of the Site Allocations Plan was published for consultation in March 2016. The following people were invited to take part in the consultation:

- North Somerset residents through a Press Release and Advert (see <http://www.n-somerset.gov.uk/news/have-your-say-on-meeting-housing-shortfall/>)
- Town and Parish Councils through a workshop held on 10th March 2016
- Agents, landowners and developers who had previously expressed an interest
- Statutory Undertakers
- Adjoining Local Authorities

People were informed about the consultation via:

- E-mail or letters to a Database of participants in previous Local Development Framework documents
- Distribution of Posters to local councils and Libraries and used as an advert in the Local Press.
- Local Press
- Twitter
- Exhibitions

Staffed exhibitions were held at:

- Weston Library, Monday 21 March, 4pm-7pm
- Nailsea Library, Tuesday 22 March, 4pm-7pm
- Churchill Primary School, Wednesday 23 March, 4.30pm-7pm
- Portishead Library, Thursday 24 March, 4pm-7pm
- Clevedon Library, Tuesday 29 March, 4pm-7pm
- Congresbury School Rooms, Wednesday 30 March, 4pm-7pm
- Yatton Library, Thursday 31 March, 4pm-7pm
- Winscombe Community Centre, Monday 4 April, 4pm-7pm.

The consultation ran from Thursday March 10th 2016 until Thursday 28th April 2016. There were 264 respondents to the consultation who made 785 individual comments.

Publication Version Consultation

The Publication version has not changed significantly enough to require consultation on the document prior to the formal consultation of the publication version. However, as part of the Publication version consultation the document will be sent to the same organisations that were consulted on the draft version. Any comments made by these organisations will then be submitted to the Inspector as part of the examination process.



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