

Disproportionate Burden Assessment

Planning Policy Documents

Scope

There is a significant amount of documentation related to the Planning Policy service, to the implementation of the adopted Local Plan and to the recently submitted draft Local Plan. Almost all of these documents are published in a PDF format, following conversion from Microsoft Word, but there are also interactive versions of some adopted documents. Documents are published on the Local Plans webpages of the Mole Valley District Council website and on the Future Mole Valley microsite.

Benefits

Our assessment of the benefits of making these documents accessible is as follows:

- All published Planning Policy documents would be accessible and could be navigated using a screen reader.

Burden

Our assessment of the burden of making these documents accessible is as follows:

- There are 76 non-accessible PDF documents published on the Local Plans webpages of the MVDC website and a further 125 non-accessible PDF documents published on the Future Mole Valley website of which 119 are produced by or on behalf of the Planning Policy service. In total there are 195 non-accessible Planning Policy documents published online as PDFs.
- A 38-page evidence base document was reviewed and the accessibility issues corrected to determine the time and costs involved. To correct the documents accessibility issues, it took one officer between 12 and 13 working hours. This averages at roughly three pages per hour. The 195 non-accessible Planning Policy published documents have a combined total of 20,895 pages. Based on the average of three pages per hour to correct a documents accessibility issues, the time taken to correct the accessibility issues of all 195 non-accessible Planning Policy documents would be 6,965 working hours. This equates to 941 working days.
- A cost figure has been calculated to be £25.21 per hour. Taking into account the time taken to correct the accessibility issues of all 195 non-accessible Planning Policy documents is calculated to take 6,965 hours, the total cost of correcting these accessibility issues would be £175,587.65.

- While many documents have been produced entirely by the Planning Policy service, there are numerous documents prepared by a variety of third parties on behalf of the Planning Policy service. Many of the documents prepared by third parties are evidence base documents with a number of development plan documents designed and produced by publishers or local community groups.
- Many documents are considerable in length and include a multitude of non-accessible, complex elements, primarily detailed tables with merged and split cells but also charts, diagrams, images and maps. There are also differing text styles, fonts and page setups which may not be accessible.
- Adopted development plan documents, published supplementary planning documents, guidance and policy statements are fairly dated, all pre-dating the new accessibility regulations as well as the current policy and legislative framework. The oldest document was published in 1997. Older documents are likely to contain more accessibility issues in comparison to more recent documents and those issues are also likely to be more complex.
- The adopted development plan documents have followed a legal process prior to formal adoption by MVDC. They cannot be altered following adoption without going through the same legal processes, however the policy and legislative framework has progressed since these documents were adopted and would not be capable of adoption under the current policy and legislative framework without significant alteration. This is the reason why MVDC has prepared and recently submitted a draft Local Plan, to replace the current adopted Local Plan.

Other factors

Also relevant to this decision are the following factors:

- There is an Accessibility Statement on the MVDC website, with a link also provided on the Future Mole Valley website, which provides information regarding accessibility issues and a point of contact to resolve accessibility issues.
- Below the Examination Library on the Future Mole Valley website, there is a sub-section on accessibility which makes clear not all the documents are fully accessible and provides contact details if the documents are required in an accessible format.
- During the previous publication period where MVDC invited public comments on an array of Planning Policy documents when the MVDC received almost 850 responses, there were no requests to MVDC to provide documents in an accessible format.
- The principal document, the submitted draft Local Plan, is accessible.
- The adoption of a new Local Plan, anticipated in early 2023, will make a number of documents, particularly the older adopted development plan documents, obsolete. When this happens the obsolete documents can be removed from the MVDC website.
- Consultations on many of the submitted draft Local Plan evidence base documents are closed and it is not planned they will be reopened.

Conclusions

It is considered the time, complexity and cost of correcting the accessibility issues of all 195 non-accessible Planning Policy documents published in the MVDC and Future Mole Valley

websites outweighs the benefits. The complexity includes the fact that policy and legislative frameworks have changed over time since development plan documents were adopted which means it is not possible to alter older documents if they require altering to make them accessible. We have also considered that there appears to be little demand to make documents accessible, evidenced by the lack of requests for accessible documents, though MVDC will always respond to requests to make documents accessible when requests are received.