

# Equalities Impact Assessment

Draft Mole Valley Local Plan 2020-2037  
Proposed Submission Version - Regulation 19



September 2021

## Section 1: Introduction and background

<b>What is being assessed?</b>	Future Mole Valley Local Plan 2020-2037: Regulation 19 submission draft
<b>Business unit</b>	Planning Policy
<b>Job title of assessor</b>	Principal Planning Policy Officer
<b>Strategic Management Lead</b>	Piers Mason
<b>Date of assessment</b>	July 2021
<b>Is this a new or existing function or policy?</b>	New policy document

### Description of the function or policy, including:

- **The aims and scope**
- **The main beneficiaries or users**
- **The main equality issues and barriers, and the protected characteristics<sup>1</sup> they relate to (not all assessments will encounter issues relating to every protected characteristic)**

### Aims and Scope

Future Mole Valley is a new Local Plan to guide development within Mole Valley. It sets out new plans and policies to guide decisions about development during the plan period (2020-2037).

The Local Plan includes targets for delivering new housing, identifies locations for new development and contains policies for guiding the type, scale and mix of new development. It also identifies areas that are protected for landscape, heritage or nature conservation purposes.

A consultation draft version of the Local Plan was published February 2020. Views were sought on the emerging Local Plan to inform the next stage of plan development. An Equalities Impact Assessment of the consultation draft was published at the same time.

Issues raised during the consultation have informed the preparation of a submission draft Local Plan, along with additional evidence-gathering where required.

Subject to the approval of MVDC's Cabinet and full Council, the submission draft Local Plan will be published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, prior to examination by a Government Inspector.

This EqIA assesses the emerging policies in the submission draft version, prior to Cabinet and Council consideration.

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<sup>1</sup>The protected characteristics are age, sex, disability, pregnancy and maternity, race and ethnicity, religion and belief, gender reassignment, sexual orientation, and marriage and civil partnership (Source: Equality Act 2010)

### **Main beneficiaries or users**

Once adopted, the Local Plan will be of interest to everyone who has an interest in Council decisions about the development of land. This includes all Mole Valley residents, businesses and service providers. It may also be of interest to people currently living outside the district but who would like to move to, or work in, Mole Valley in the future.

Developers, landowners and their advisers will also be major users of the Local Plan as it will guide decisions affecting their interests.

Other main users will include a wide variety of public bodies, local community groups and representative bodies such as Parish Councils and Residents Associations. Among these will be groups specifically representing the interest of people with protected characteristics; for example the Mole Valley Access Group, Surrey Gypsy Traveller Communities Forum, religious organisations and organisations working with youth and older people.

### **Main equality issues and barriers**

While the Local Plan is aimed at the whole Mole Valley community, there are some sectors which could be more directly affected than others.

The evidence-gathering phase identified issues relating to Mole Valley's ageing policy, which has led to the development of policies to deliver an appropriate range of housing and accommodation with care. Draft policies also seek to improve the accessibility of new development and the suitability of new housing for people with disabilities and/or particular needs associated with old age.

The draft Local Plan is supported by an Infrastructure Delivery Plan which identifies needs for additional infrastructure to support development. This includes infrastructure aimed at specific protected groups, such as educational facilities for younger people. It also includes infrastructure such as health facilities, which supports all sectors of the community but may be more intensively used by certain protected groups, for example as a result of pregnancy, disability or age.

The draft Local Plan includes policies for the provision of sites for gypsies, travellers and travelling showpeople. Specific engagement with this hard-to-reach group has informed the direction of these draft policies and will continue to be required as the plan progresses, to ensure equality of opportunity in the shaping of emerging policy.

The emerging Local Plan includes proposed development to support rural communities and safeguard a thriving rural economy and local services in the rural areas.

**Description of how the function or policy fits into the Council's Corporate Priorities or other local, regional or national plans and priorities**

Preparation of a Local Plan is a requirement of national planning policy in the National Planning Policy Framework (NPPF). The draft Local Plan and supporting evidence has been prepared in line with processes set out in the NPPF February 2019 and associated national planning policy guidance.

A key aim is to provide for the District's objectively assessed development needs, to an extent that is consistent with policies for protecting areas or assets of particular importance (NPPF paragraph 11). Increasing the supply of housing is a Government priority expressed through the NPPF and a variety of national policy statements.

In terms of MVDC's Corporate Priorities, the preparation of a Local Plan is a key element of the Environment Priority in the MVDC Council Strategy 2019-2024.

Under this heading, MVDC aims to:

- Protect and enhance the natural and built environment, and ensure our areas of natural beauty and wildlife are well looked-after.
- Promote sustainable development that takes into account social, economic and environmental factors, including protection of the Green Belt.
- Encourage the creation of affordable housing to meet local needs and explore innovative methods of delivery.

Aspects of the Local Plan also support MVDC's objectives under the Community Wellbeing and Prosperity Priorities, including:

- Promote opportunities for residents of all ages to live safe, healthy and fulfilling lives (Community Wellbeing)
- Encourage participation in sports, leisure, cultural and educational activities, to promote responsible enjoyment of our parks, open spaces, heritage and countryside (Community Wellbeing)
- Work towards making Mole Valley a prime business location with improved infrastructure to attract and retain creative, entrepreneurial and innovative talent (Prosperity)
- Continue to drive the transformation of Leatherhead Town Centre and promote the character, culture and economy of Dorking (Prosperity)
- Work with rural communities and businesses to enhance their strengths and address their challenges, helping them thrive and become more sustainable (Prosperity)
- Promote Mole Valley as a place for people to spend their leisure time and support local businesses to maximise opportunities from recreation and tourism (Prosperity)

The draft Local Plan also includes a range of policies supporting MVDC's Climate Strategy June 2020 and the Climate Emergency Declaration June 2019.

## Section 2: Analysis and assessment

Protected characteristics	Positive	Negative	No impact	Reason
Age	√			<p>Evidence about needs for specialist housing has informed a policy framework to guide the development of housing and accommodation with care, to meet the needs of an ageing population. E.g. draft policy H6.</p> <p>The draft Local Plan introduces a requirement to meet optional building regulations to improve the accessibility and adaptability of new dwellings, which is likely to benefit to people who develop mobility problems due to old age. E.g. draft policy H10. This is a positive measure, as MVDC is not currently in a position to enforce these optional regulations, due to a lack of a planning policy framework to do so.</p> <p>Draft policy EN5 Inclusive Environments sets out measures to ensure larger developments including new streets and open spaces are designed in a manner which supports the needs of older people, including those living with dementia.</p> <p>Part 6 of draft policy EN5 would be a material consideration in favour of any specific development proposals designed to meet needs relating to age; for example where new built development would provide a youth club or an older person's day centre.</p> <p>The new Local Plan will increase the supply of new affordable housing by means of draft policy H3 Affordable Housing and site allocations which significantly boost the supply of housing. This will benefit younger people, in cases where their more limited earning potential means that their needs are not met by the open market.</p>

				<p>Draft policy H6 also applies to developments providing retirement housing, sheltered housing, extra care housing or other self-contained housing for older people. The aim is to ensure that specialist housing is available for all older people, including those who cannot access suitable housing on the open market.</p> <p>Housing growth will increase demand on key services which are used by older or younger people – e.g. education, health facilities, youth centres. MVDC has engaged with health and education providers during plan preparation, to gather evidence of infrastructure needs arising from new development. The draft Local Plan and Infrastructure Delivery Plan include sites for new GP surgeries and community hubs, as well as identifying locations where expansion of existing schools will be necessary in parallel with delivery of new housing.</p> <p>Planned development will generate funds through the Community Infrastructure Levy (CIL), which will help support investment in additional health, education and community infrastructure.</p> <p>Draft policies include provision of new children’s playspace on larger housing developments, which will also be available to children and young people in the existing population.</p>
Sex			√	It is not considered that the new Local Plan will impact on equality issues relating to sex.
Disability	√			Evidence about needs for specialist housing has informed a policy framework to guide the development of housing and accommodation with care, including for people with disabilities. E.g. draft policy H6.

			<p>The draft Local Plan introduces a requirement to meet optional building regulations to improve the accessibility, adaptability and suitability of new dwellings for people with disabilities, including wheelchair users (draft policy H10). This is a positive measure, as MVDC is not currently in a position to enforce these optional regulations, due to a lack of a planning policy framework to do so.</p> <p>Draft policy EN5 Inclusive Environments sets out a wide range of measures to ensure that larger developments are designed in a manner which supports the needs of people with disabilities, including sensory and mobility issues as well as those living with dementia.</p> <p>Part 6 of draft policy EN5 would be a material consideration in favour of any specific development proposals designed to meet needs relating to disability; for example to improve access to existing premises.</p> <p>The draft policies include updated parking standards, including requirements for provision of parking spaces for people with disabilities (draft policies INF2 and EN5).</p> <p>The supporting text to draft policy EN5 recognises that there may be cases where planning standards should be relaxed to make a listed building more accessible to people with disabilities.</p> <p>The new Local Plan will increase the supply of new affordable housing by means of draft policy H3 Affordable Housing and the site allocations which significantly boost the supply of housing. This can benefit people with disabilities which limit their earning potential, who are likely to be in greater need of affordable housing than the population as a whole.</p>
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Pregnancy and maternity			√	<p>Housing growth will place additional demand on key services, including health services, which are particularly important during pregnancy and following birth.</p> <p>MVDC has engaged with health providers during plan preparation to gather evidence of the infrastructure needs arising from new development. The draft Local Plan and Infrastructure Delivery Plan include sites for new health facilities, aligned with Clinical Commissioning Group advice, to support delivery of healthcare provision in parallel with delivery of new housing.</p> <p>Planned development will generate funds through CIL, which will help to support investment in additional health infrastructure.</p>
Race and ethnicity	√			<p>The draft Local Plan makes provision for culturally appropriate accommodation for gypsies and travellers (draft policy H5). This prioritises the needs of those who maintain a nomadic lifestyle, as required in the national Planning Policy for Traveller Sites 2015. The policy also includes consideration of requirements for members of protected ethnic groups who are no longer nomadic but retain a cultural preference for caravan-dwelling.</p> <p>Travelling showpeople also have specialist accommodation needs, although they are not defined as a protected ethnic group. Their specialist accommodation needs are addressed through a supportive policy framework, although specific sites for delivery of travelling showpeople's yard(s) have not yet been identified.</p> <p>Other Local Plan policies are considered to be neutral with respect to race and ethnicity.</p>

Religion and belief	√			<p>Part 6 of draft policy EN5 would be a material consideration in favour of any specific development proposals designed to meet needs relating to religion and belief, for example new or expanded places of worship.</p> <p>Other Local Plan policies are considered to be neutral with respect to equality issues relating to religion and belief.</p>
Gender reassignment	√			<p>Part 6 of draft policy EN5 would be a material consideration in favour of any specific development proposals designed to meet the needs of people undergoing gender reassignment.</p> <p>Other Local Plan policies are considered to be neutral with respect to equality issues relating to gender reassignment.</p>
Sexual orientation	√			<p>Part 6 of draft policy EN5 would be a material consideration in favour of any specific development proposals designed to meet needs relating to sexual orientation.</p> <p>Other Local Plan policies are considered to be neutral with respect to equality issues relating to sexual orientation.</p>
Marriage and civil partnership			√	It is not considered that the new Local Plan will impact on equality issues relating to marriage and civil partnership.
<b>Other aspects to consider</b>	<b>Positive</b>	<b>Negative</b>	<b>No impact</b>	<b>Reason</b>
Carers	√			The new Local Plan will indirectly benefit those caring for older people or people with disabilities, as a result of the positive impacts on those they care for, as summarised above.
Rural/urban access issues	√	√		Taken as a whole, the new Local Plan will have some positive and some negative effects on rural/urban access issues. The overall impact is considered to be neutral.

			<p>The draft Local Plan includes proposals and policies which are specifically designed to support a thriving rural economy and vibrant village communities. For example draft policy EC4 The Rural Economy, INF4 Community Facilities and site allocations for modest expansion of rural villages.</p> <p>By supporting village vitality, the Local Plan will help support existing services which are conveniently located for those living in rural areas.</p> <p>The new Local Plan will increase the population, which could increase the number of people experiencing access issues. To mitigate this potential impact, housing site selection has taken access issues into account. An audit of service availability is incorporated in the Settlement Hierarchy underpinning the Local Plan, which in turn informs the selection of locations for development.</p> <p>Rural villages which lack public transport and have the most limited range of services would have only a modest level of planned housing growth. Larger-scale growth in the rural areas would be in locations which are better served by local services and public transport networks.</p> <p>The majority of large-scale site allocations are within or on the edge of existing urban areas, which have a more extensive public transports network and a wider range of services accessible on foot or by cycle.</p> <p>A number of larger rural site allocations include requirements for improvement of walking, cycling and public transport facilities, proportionate to their scale.</p>
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				<p>The largest proposed site allocation in the rural areas (at Hookwood), includes a requirement for new community provision including health services, which will improve service accessibility in this part of the District.</p> <p>In both rural and urban areas, the increased population associated with housing development will help to generate demand for public transport and local services, supporting their viability where this is marginal.</p> <p>Planned development will generate funds through CIL, which will help support investment in additional local infrastructure, including through neighbourhood CIL which is available for local projects.</p>
HR issues (how will staff with protected characteristics be affected?)			√	The new Local Plan does not raise any HR issues.

<p><b>What can be done to reduce the effects of any negative impacts?</b> Where negative impact cannot be completely diminished, can this be justified, and is it lawful?</p>
<p>As noted above, there is a risk that increased demand on services such as schools and health facilities could disproportionately impact members of protected groups, if infrastructure does not grow in parallel with housing growth. This has been addressed through collaboration between MVDC and stakeholders including the Clinical Commissioning Group and Education Authority. The draft Local Plan and Infrastructure Delivery Plan include sites for new health and community facilities, as well as identifying locations where expansion of existing schools and community buildings will need to be delivered in parallel with delivery of new housing.</p> <p>Draft policy D1 sets out the approach to delivery of infrastructure and Local Plan monitoring arrangements include regular review of infrastructure delivery (Chapter 10, Monitoring Framework, Policy D1).</p> <p>Since MVDC is not the lead provider for the majority of infrastructure, effective delivery will also require ongoing collaboration between MVDC, the Clinical Commissioning Group, Education Authority and other partners such as local GP practices, Free School providers and early years educators.</p>

The draft Local Plan housing trajectory details anticipated phasing of housing growth, which has been shared with infrastructure providers and will inform ongoing engagement to ensure that infrastructure to support new development is planned and delivered in a coordinated manner.

The potential increase in the number of people experiencing access issues has been mitigated through the site selection process. It will be further mitigated through planning mechanisms such as travel plans and site-specific transport improvements on larger rural sites and use of CIL (including the neighbourhood portion) to invest in local infrastructure.

**Where there are positive impacts, what changes have been or will be made?**

Who are the beneficiaries? How have they benefited?

In summary, the draft Local Plan will:

- Increase the supply of housing to meet a range of needs, including specific needs of older and younger people, people with disabilities and those on lower incomes.
- Introduce new requirements to improve the accessibility of new dwellings for people with disabilities and those with mobility problems associated with old age.
- Increase the supply of culturally appropriate accommodation for gypsies, travellers and travelling showpeople.
- Introduce new requirements for the design of larger-scale developments, making them more suitable for people with a range of protected characteristics.
- Ensure that the needs of protected groups are given appropriate weight when considering development proposals specifically related to their needs.
- Support the future vitality of rural communities, helping to safeguard local services which are easily accessed by the rural population.
- Secure the provision of children's play space as part of new development, which will also be accessible to the existing population.

### Section 3: Evidence gathering and fact-finding

#### What evidence is available to support your views above?

Please include:

- A summary of the available evidence
- Identification of where there are gaps in the evidence (this may identify a need for more evidence in the action plan)
- What information is currently captured with respect to usage and take up of services.
- What the current situation is in relation to equality and diversity monitoring (where relevant)

The draft Local Plan has an extensive evidence base, which is made publicly available on MVDC's website. Evidence which has specifically informed the conclusions above includes:

- Gypsy and Traveller Accommodation Assessment (March 2021)
- Evidence Paper: Specialist Housing the Support People with Disabilities and an Ageing Population (February 2020)
- Future Mole Valley Infrastructure Delivery Plan (updated 2021)
- Future Mole Valley Sustainability Appraisal/Strategic Environmental Appraisal 2021
- Strategic Housing Market Assessment (2016, updated 2020)
- Economic Development Needs Assessment (2017) and Addendums (2017, 2018, 2020)
- MVDC Equality Policy Statement and Objectives 2017-2021

#### How have stakeholders been involved in this assessment?

Who are they, and what is their view?

A wide range of stakeholders have informed the contents of the draft Local Plan. Those directly relevant to the issues highlighted above include:

- Surrey County Council (including Adult Social Care, Education, Estates)
- Surrey Gypsy Traveller Communities Forum
- Showmen's Guild of Great Britain
- Surrey Heartlands Clinical Commissioning Group
- Other relevant infrastructure providers

The draft Local Plan policies also take account of views expressed on a consultation draft version of the Local Plan published in February 2020. Where views related to equalities considerations, these have been given due consideration and a number of policies have been amended and improved in response.

## **Recommendations**

Summary of the main recommendations (if any) arising from the assessment

Once adopted, monitor implementation of Local Plan policies through publication of an annual Authority Monitoring Report.

Based on annual monitoring, implement actions highlighted in the Local Plan Monitoring Framework as and when required.

Continue to work with infrastructure providers to progress projects highlighted in the Infrastructure Delivery Plan. In particular, maintain dialogue with education and health providers, to support co-ordinated delivery of infrastructure identified in the Local Plan, at the right time and location to support new housing development.

Regularly review the Infrastructure Delivery Plan to support monitoring of infrastructure delivery.

## Section 4: Action Plan

Actions needed to implement the EqlA recommendations (if any)

<b>Issue</b>	<b>Action</b>	<b>Expected outcome</b>	<b>Who</b>	<b>Deadline for action</b>
Monitoring of effectiveness of Local Plan policies	Prepare annual Authority Monitoring Report	Actions are implemented as set out in Local Plan Monitoring Framework, addressing any underperformance against specific policies	MVDC Planning Policy Team	Annually, as soon as practicable after 1 April
Delivery of education infrastructure to support new development	Continue to provide Education Authority with six monthly updates on planning permissions granted for new housing development	SCC School Organisation Plan and other relevant plans and strategies for education provision are well informed by up to date information about housing growth	MVDC Planning Policy Team	At six monthly intervals
Delivery of health infrastructure to support new development	Provide health commissioners with six monthly updates on planning permissions granted for new housing development	Commissioning of primary care and other health services is well informed by up to date information about housing	MVDC Planning Policy Team	At six monthly intervals
Delivery of infrastructure to support new development	Regular review of Infrastructure Delivery Plan to monitor progress on infrastructure delivery, particularly sites allocated for health and community provision in the Local Plan and expansion of existing schools.	Decisions about prioritising CIL expenditure are informed by evidence of infrastructure delivery and MVDC is in an informed position to work with key partners to address any emerging gaps in infrastructure delivery.	MVDC Planning Policy Team	Annually, as soon as practicable after 1 April

