



**EQUALITIES
IMPACT
ASSESSMENT**

January 2020

Section 1: Introduction and background

What is being assessed?	Future Mole Valley Local Plan 2018-2033: Regulation 18 Consultation version
Business unit	Planning Policy
Job title of assessor	Principal Planning Policy Officer
Strategic Management Lead	Jack Straw
Date of assessment	October 2019 (Section 3 amended December 2019, to update evidence base publication dates)
Is this a new or existing function or policy?	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 characteristics¹ 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 will set out plans and policies to guide decisions about development in the District during the plan period (2018-2033).

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

The Regulation 18 Consultation will seek views on the emerging Local Plan, which will inform the next stage of plan development, prior to examination by a Government Inspector.

Main beneficiaries or users

The emerging 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.

¹The 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)

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- **The aims and scope**
- **The main beneficiaries or users**
- **The main equality issues and barriers, and the protected characteristics¹ they relate to (not all assessments will encounter issues relating to every protected characteristic)**

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

Main equality issues and barriers

Whilst the Local Plan is aimed at the District's community – there are some communities which could be more affected by the plan than others.

The emerging Local Plan includes draft policies for the provision of sites for gypsies, travellers and travelling showpeople. Specific engagement with this hard to reach group will be required during the consultation process, to ensure equality of opportunity in the shaping of emerging policy.

The evidence-gathering phase has identified issues relating to Mole Valley's ageing population, leading to the development of policies to deliver an appropriate range of housing and accommodation with care. Emerging 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 emerging Local Plan is supported by a draft Infrastructure Delivery Plan which considers needs for additional infrastructure to support development. This includes infrastructure aimed at specific groups (e.g. educational facilities for younger people, children's playspace and community facilities which are accessible to all).

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 emerging 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 deliver the objectively assessed development needs of Mole Valley District, notably the provision of additional housing to meet a wide variety of needs. Increasing the

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supply of housing is a Government priority expressed through a variety of national policy statements.

In terms of MVDC's Corporate Priorities, 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 will 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)

Section 2: Analysis and assessment

Indicate for each protected characteristic whether there may be a positive impact, negative impact, a mixture of both or no impact – using a tick in the appropriate columns

Protected characteristics	Positive	Negative	No impact	Reason
Age	✓			<p>The evidence base for the Local Plan includes evidence about needs for specialist housing, which has informed a policy framework to guide the development of a variety of housing and accommodation with care, to meet the needs of an ageing population.</p> <p>Other policies include introduction of optional building regulations to improve the accessibility, adaptability and suitability of new dwellings for wheelchair users, which is likely to be of benefit to people who develop mobility problems due to old age.</p> <p>The policy on “Inclusive Environment” would be a material consideration in favour of development proposals to meet the needs of both young people and an ageing population through development.</p> <p>The Plan will result in the development of more affordable housing. This can benefit younger people, who tend to have greater need for affordable housing, if their earning potential means that their needs are not met by the open market. Policies also include a requirement for affordable extra care housing on developments for older people, which responds to</p>

Protected characteristics	Positive	Negative	No impact	Reason
				<p>specific issues raised in evidence from Surrey County Council's Accommodation with Care and Support Strategy.</p> <p>Additional housing growth will place additional demand on key services which are heavily used by older or younger people (e.g. education, health, youth centres). However, the Local Plan will be supported by an Infrastructure Delivery Plan to ensure that infrastructure requirements associated with new development are understood and delivered.</p> <p>MVDC has engaged with health and education providers during the early stages of plan preparation, to highlight the amount and timescales for additional development, to assist with forward planning.</p> <p>Planned development will generate funds through the Community Infrastructure Levy, which will help to support investment in additional health, education and community infrastructure, if required.</p> <p>Policies include provision of children's playspace associated with new housing development.</p>
Sex			✓	It is not considered that the Plan will impact on equality issues relating to sex.
Disability	✓			The evidence base for the Local Plan includes evidence about needs for specialist housing, which

Protected characteristics	Positive	Negative	No impact	Reason
				<p>has informed a policy framework to guide the development of a variety of housing, including for people with disabilities.</p> <p>The emerging Local Plan includes a policy framework for introduction of optional building regulations to improve the accessibility, adaptability and suitability of new dwellings for wheelchair users. This is a positive measure, as MVDC is not currently in a position to enforce these optional regulations, due to lack of a planning policy framework to do so.</p> <p>The policy on “Inclusive Environment” aims to support MVDC in securing well-designed, safe and accessible environments through development. This policy would also be a material consideration in favour of any development proposals specifically focussed on people with additional needs, including people with physical and learning disabilities, and those with impairment such as sight or hearing.</p> <p>The supporting text makes clear that environmental barriers that restrict accessibility, such as uneven surfaces, unnecessary steps and narrow gates, should be avoided.</p> <p>The Local Plan will include updating of parking standards, which include standards for provision of</p>

Protected characteristics	Positive	Negative	No impact	Reason
				<p>suitable parking spaces for people with disabilities.</p> <p>The Local Plan recognises that there may be cases where planning standards or policies should be relaxed where it is desirable to make a listed building more accessible to people with disabilities and sets out considerations which will be relevant in this situation.</p> <p>The Plan will result in the development of more affordable housing. This should benefit people with disabilities which limit their earning potential, who are likely to be in greater need of access to affordable housing than the population as a whole.</p>
Pregnancy and maternity			✓	<p>Additional housing growth will place additional demand on key services, including health services which are particularly important during pregnancy and following birth.</p> <p>However, the Local Plan will be supported by an Infrastructure Delivery Plan to ensure that infrastructure requirements associated with new development are understood and delivered. MVDC has also engaged with health providers during the early stages of plan preparation, to highlight the amount and timescales for additional development, to assist with forward planning.</p> <p>Planned development will generate funds through the Community Infrastructure Levy, which will help to</p>

Protected characteristics	Positive	Negative	No impact	Reason
				support investment in additional health infrastructure, if required.
Race and ethnicity	✓			<p>The emerging Local Plan makes provision for culturally appropriate accommodation for gypsies and travellers. This includes provision for members of protected ethnic groups who have ceased to travel but retain a cultural preference for caravan-based dwelling.</p> <p>The Plan will make provision for the District's housing and other development needs, which is of general benefit, regardless of racial or ethnic background.</p>
Religion and belief	✓			The policy on "Inclusive Environment" would be a material consideration in favour of any development proposals which were specifically designed to meet the needs of religious groups – for example development of places of worship or community facilities to meet faith-related needs.
Gender reassignment	✓			<p>The majority of the Plan is neutral with respect to equality issues relating to gender reassignment.</p> <p>However, the policy on "Inclusive Environment" would be a material consideration in favour of any development proposals which were specifically designed to meet the needs of people undergoing gender reassignment.</p>
Sexual orientation	✓			The majority of the Plan is neutral with respect to

Protected characteristics	Positive	Negative	No impact	Reason
				<p>equality issues relating to sexual orientation.</p> <p>However, the policy on “Inclusive Environment” would be a material consideration in favour of any development proposals which were specifically designed to meet the needs of LGBTQ+ people.</p>
Marriage and civil partnership			✓	It is not considered that the Plan will impact on equality issues relating to marriage and civil partnership.

Other aspects to consider	Positive	Negative	No impact	Reason
Carers	✓			The emerging Local Plan will have indirect benefits to those caring for older people or people with disabilities, by association with positive impacts on those they care for, as summarised above.
Rural/urban access issues	✓	✓		<p>Taken as a whole, the Local Plan will have some positive and some negative effects on access issues. The overall impact is considered to be neutral.</p> <p>The emerging Local Plan includes proposals which are specifically designed to support a thriving rural economy and vibrant village communities. By supporting village vitality, the Local Plan will help to support existing local services which are conveniently located for those living in rural areas.</p> <p>However, it will also increase the rural population, which could potentially increase the number of people experiencing access issues.</p>

Other aspects to consider	Positive	Negative	No impact	Reason
				<p>To mitigate this potential impact, housing site selection has taken access issues into account.</p> <p>Rural villages which lack public transport and a range of services would have only a modest level of planned housing growth. Larger-scale growth in the rural areas would be on strategic sites in Beare Green and Hookwood, both of which are relatively well served by local services and public transport networks. The majority of strategic housing sites are within or on the edge of existing urban areas, which have a more extensive public transport network and a wider range of services accessible on foot or by cycle.</p> <p>In both rural and urban areas, the increased population associated with housing development will help to generate higher demand for transport and services, supporting their viability. Travel plans will be required on larger rural housing sites, helping to promote availability and use of sustainable transport options.</p> <p>Planned development will generate funds through the Community Infrastructure Levy, which will help to support investment in additional transport infrastructure, if required.</p>

Other aspects to consider	Positive	Negative	No impact	Reason
HR issues (how will staff with protected characteristics be affected?)			✓	Preparation of the Local Plan does not raise any HR issues.

What can be done to reduce the effects of any negative impacts?

Where negative impact cannot be completely diminished, can this be justified, and is it lawful?

Increased demand on services such as schools and health facilities could potentially impact disproportionately on members of protected groups. This can be reduced through ongoing collaboration between MVDC, SCC, the Surrey Downs CCG and other stakeholders, to ensure that infrastructure to support new development is planned and delivered in a coordinated manner. The Infrastructure Delivery Plan prepared to support the Local Plan is a key component in this process.

Potential increase in the number of people experiencing access issues has been mitigated through the site selection process and can be further mitigated through planning mechanisms such as travel plans on larger rural housing sites and use of CIL (including neighbourhood CIL) to invest in rural infrastructure including transport.

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

Who are the beneficiaries? How have they benefited?

In summary, the emerging 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.
- Include policies which are supportive of development proposals specifically addressing needs of a range of groups with protected characteristics.
- 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.

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 emerging Local Plan has an extensive evidence base, which is detailed in Appendix 3 of the draft Local Plan.

Evidence which has specifically informed the conclusions above includes:

- Strategic Housing Market Assessment for Kingston Upon Thames and North East Surrey Authorities (SHMA) (Mole Valley District Council, The Royal Borough of Kingston Upon Thames, Elmbridge Borough Council and Epsom and Ewell Borough Council 2016)
- Economic Development Needs Assessment 2017 and Addenda published July 2018 and January 2020
- Gypsy and Traveller Accommodation Assessment (2018)
- MVDC Rural Community Strategy 2017-2027 (2017)
- Draft Infrastructure Delivery Plan (January 2020)
- Regulation 18 Sustainability Appraisal/Strategic Environmental Appraisal (January 2020)
- Evidence Paper: Specialist Housing to Support People with Disabilities and an Ageing Population (January 2020)
- Parking Evidence Paper and Draft Local Parking Standards SPD (January 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 been involved in informing the contents of the emerging Local Plan. Those directly relevant to 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 Downs CCG and Surrey Heartlands partnership
- Infrastructure providers

Further reviews of this Equalities Impact Assessment will take into account any relevant information provided by stakeholders during public consultation under Regulation 18.

Recommendations

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

Monitor implementation of Local Plan policies through publication of an annual Authority Monitoring Report. Implement actions highlighted in the Monitoring Framework included in the emerging Local Plan, as and when required.

Continue to work with infrastructure providers to progress projects highlighted in the Infrastructure Delivery Plan, where MVDC has a role in delivering those projects. In particular, maintain dialogue with Education and Health providers as Local Plan preparation progresses, to support co-ordinated delivery of infrastructure to support new housing development.

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

Section 4: Action Plan

Actions needed to implement the EqIA recommendations (if any)

Issue	Action	Expected outcome	Who	Deadline for action
Monitoring of effectiveness of Local Plan policies	Prepare annual Authority Monitoring Report	Actions are implemented as set out in Local Plan Monitoring Framework address any underperformance against specific policies	MVDC Planning Policy Team	Annually, as soon as practicable after 1 April
Delivery of 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, Childcare Sufficiency Assessments and other relevant analysis are well informed by up to date information about housing growth	MVDC Planning Policy Team	At six monthly intervals
Delivery of infrastructure to support new development	Establish a system for regularly (at least annually) updating health commissioners with data on planning permissions granted for new housing development contained in the Local Plan.	Commissioning of primary care and other health services is well informed by up to date information about housing growth	MVDC Planning Policy Team in conjunction with Surrey Heartlands Health and Care Partnership	Prior to adoption of Local Plan

Issue	Action	Expected outcome	Who	Deadline for action
Delivery of infrastructure to support new development	Regular review of Infrastructure Delivery Plan to monitor progress on infrastructure delivery, particularly projects relating to health and education provision to support housing growth	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 emerging gaps in infrastructure delivery	MVDC Planning Policy Team	Annually, as soon as practicable after 1 April