DRAFT Equality Impact Assessment (EqIA) Report

Please note that this is a working draft EIA report, which is being updated and developed as the Plan progresses.

This EqIA was undertaken post Deposit LDP Consultation.

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

<table>
<thead>
<tr>
<th>Where do you work?</th>
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</thead>
<tbody>
<tr>
<td>Service Area: Economic Regeneration and Planning Service</td>
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<tr>
<td>Directorate: Regeneration and Housing Department</td>
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</table>

This EqIA is being completed for a:

<table>
<thead>
<tr>
<th>Service/ Function</th>
<th>Policy/ Procedure</th>
<th>Project</th>
<th>Strategy</th>
<th>Plan</th>
<th>Proposal</th>
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Please name and describe below...

Local Development Plan (LDP) The LDP will provide a long-term vision for land use planning in Swansea from adoption onwards.

The Local Development Plan was initially screened for relevance to Equality and Diversity on 06/10/2011

It was found to be relevant to...

<table>
<thead>
<tr>
<th>Age</th>
<th>Disability</th>
<th>Gender reassignment</th>
<th>Marriage &amp; civil partnership</th>
<th>Pregnancy and maternity</th>
<th>Race</th>
<th>Religion or (non-)belief</th>
<th>Sex</th>
<th>Sexual orientation</th>
<th>Welsh language</th>
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</tbody>
</table>

Since the initial screening new categories have been added to the EqIA screening process, of which the following are also deemed relevant.

<table>
<thead>
<tr>
<th>Children/young people (0-18)</th>
<th>Any other age group (18+)</th>
<th>Poverty/social exclusion</th>
<th>Community cohesion</th>
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(e) Lead Officer
Name: Rachel Davies
Job title: Senior Planning Officer
Date: 3rd June 2016

(f) Approved by Head of Service
Name: Phil Holmes
Date: 6th June 2016
Section 1 – Aims

Briefly describe the aims of the initiative:

What are the aims?
Each Local Planning Authority has a statutory duty to prepare a local development plan (LDP) within the framework set by national planning policy in Planning Policy Wales. The aims and objectives of Swansea’s Local Development Plan are consulted on at various statutory stages of the process. The Vision, Objectives and Strategic Options proposed the aims of the Local Development Plan. They were consulted on between July and October 2012. Based on the responses the Preferred Strategy was formulated and subsequently consulted on between August and October 2013. The results from the consultations informed the production of the Deposit LDP. The final aims and objectives of the Local Development Plan are set out in full within Deposit Local Development Plan Chapter 1, Local Development Plan Strategy and Overview.

Who has responsibility?
The City and County of Swansea’s Planning Department.

Who are the stakeholders?
Everyone who lives, works, visits or has an interest in the City & County of Swansea.
Section 2 - Information about Service Users

Please tick what information you know about your service users and provide details/evidence of how this information is collected.

- Children/young people (0-18) .......................................................... ☑
- Carers (inc. young carers) .......................................................... ☐
- Any other age group (18+) .......................................................... ☑
- Race ......................................................................................... ☑
- Disability ................................................................................. ☑
- Religion or (non-)belief .......................................................... ☑
- Gender reassignment .............................................................. ☐
- Sex ......................................................................................... ☐
- Marriage & civil partnership ..................................................... ☐
- Sexual orientation ................................................................. ☐
- Pregnancy and maternity ......................................................... ☐
- Welsh language ....................................................................... ☑

What information do you know about your service users and how is this information collected?

Service users in planning are more than just those who submit planning applications. Planning affects everyone who lives, works, visits or has an interest in the City and County of Swansea. As such detailed baseline data has been collected about the population, inclusive of neighbouring authorities. The Local Development Plan evidence base must be robust, credible and comprehensive, as highlighted by one of the tests of soundness the plan must comply with. This baseline data can be found within various documents such as the Scoping Report for the Sustainability Appraisal\(^1\), the Ward Profiles\(^2\), and various specialist and topical studies, such as the Population and Household Projections\(^3\), the Transport Assessment\(^4\) and the Open Space Assessment\(^5\).

Sample of Information Collected:

- Age Structure Small Area Population Estimates
- Ethnicity.
- Welsh Language
- Household Composition
- Welsh Index of Multiple Deprivation (WIMD)
- Self Reported Health
- Economic Status (people ages 16-74)
- Social Profile and Qualifications
- People with Support Needs
- Projected Populations

Baseline LDP data is available to view via:

http://www.swansea.gov.uk/ldpbackgroundpapers

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1 The Local Development Plan Sustainability Appraisal and Strategic Environmental Assessment Scoping Report February 2012 available via: http://www.swansea.gov.uk/ldpsasea
4 Swansea Strategic Transport and Development Study Report December 2015 available via: http://www.swansea.gov.uk/?articleid=5149
5 City & County of Swansea Open Space Assessment 2015 http://www.swansea.gov.uk/ldposa
Any Actions Required?
None. During the statutory monitoring process the evidence base for the Local Development Plan will be kept up to date and relevant. There is no data collected on certain characteristics, namely gender reassignment, marriage & civil partnership, pregnancy & maternity, carer and sexual orientation, as the Local Development Plan does not directly or tangibly have an impact on these characteristics.
Section 3 - Impact on Protected Characteristics

<table>
<thead>
<tr>
<th>Positive</th>
<th>Negative</th>
<th>Neutral</th>
<th>Needs further investigation</th>
</tr>
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<tbody>
<tr>
<td>Children/young people (0-18)</td>
<td>x</td>
<td></td>
<td></td>
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</table>

Thinking about your answers above, please explain in detail why this is the case.

The evidence base for the Local Development Plan includes census data and various other pieces of socio-economic research which highlight the various protected characteristics. There are numerous potential impacts the plan will have if development comes forward. For example, major developments will be required to improve the active travel network, this will impact positively on those without access to the private car, inclusive of young people. Similarly the plan requires design to imbed the principles of “access for all”, therefore new developments will positively enhance the built environment for disabled people, older and younger people. The monitoring of the Local Development Plan will update this data as and when required, therefore impacts of the Local Development Plan can be monitored throughout the Plan’s implementation.

In terms of the positive impacts highlighted above, specific Policies and Guidance include:

Age: Older people, children and young people are included within the key concept of ‘accessibility for all’ within Planning Policy Wales. This concept is included within multiple policies, inclusive of a policy on Public Rights of Way and Recreational Routes and one on Specialist Housing. Specifically for young people, providing play space for children is also encouraged within the Open Space Policies. The LDP has also taken account of Council documents such as Ageing Well, Strategy for Older People Action Plan 2015 – 2019, Children and Young People’s Rights Scheme and the Strategic Equality Plan 2016 - 2020.

Disability: Planning Policy Wales provides the regulatory framework and guidance with regards to planning and disability, especially section 3.4 Ensuring access for all. In addition to Technical Advice Note 12: Design. As detailed in Planning Policy Wales the plan must be prepared in line with the Disability Discrimination Act 1995 (which has now been superseded by the Equality Act 2010).
Race: As detailed in Planning Policy Wales plan preparation should be inclusive and recognise the requirements of all sectors of society, including in compliance with the general duty in the Race Relations (Amendment) Act 2000 (which has now been superseded by the Equality Act 2010).

Welsh Language: Is explicitly covered in Planning Policy Wales and Technical Advice Note 20: Planning and the Welsh Language. Both illustrate how the Welsh Language should be considered when preparing LDPs. The Policy Development in Welsh Language Sensitive Areas specifically engages with the effects of development on the Welsh Language, protecting the language is highlighted in the overarching policy Sustainable Settlements, safeguarding and promoting the language is contained within the policy Historic and Cultural Environment. The Council is also subject to the Welsh Language Standards, as of 30th March 2016.

What consultation and engagement has been undertaken (e.g. with the public and/or members of protected groups) to support your view? Please provide details below.

Consultation was undertaken throughout the Local Development Plan preparation process in line with guidance from Welsh Government. This included a list of consultees in Annex B (Consultees for LDPs) within the Local Development Plan Manual – Edition 2 -August 2015. In addition to the list we have also identified other groups to consult with, inclusive of age, disability, racial, ethnic, cultural or national groups, religious institutions, and LGBT groups that operate nationally or within Swansea. A list is available within the LDP Delivery Agreement available via: http://www.swansea.gov.uk/ldpda. An Initial Consultation Report detailing the steps taken has been produced and is available via: http://www.swansea.gov.uk/ldpdeposit and a Consultation Report will be submitted to the Welsh Government appointed independent Inspector and will be made available via: www.swansea.gov.uk/ldp in due course.

All Local Development Plan consultation must be undertaken in such a way that meets the requirements of guidance and legislation, and ultimately the tests of soundness that the independent Welsh Government appointed Inspector will apply during the Local Development Plan Examination. In addition, the Planning Policy Team has undertaken further consultation methods, and has included extra consultation stages to those required by the Welsh Government. Methods so far have included site notices placed around all candidate sites, a logo design competition for schools and colleges, presentations to various groups including U3A and Disability forum, utilising the Swansea Voices surveys (a representative questionnaire panel of Swansea residents), community drop in sessions spread throughout the county, promotion of the availability of officers to meet and talk with individuals, sending of newsletters and update emails to all consultees. For the community drop in sessions we chose a wide range of venues across the county and ensured there were accessible venues. Documents that we have produced have also carried the accessibility strap line: “If you require this document in a different format, e.g. large print, Braille, audio version, etc. please contact the Planning Policy on 01792 635744, email ldp@swansea.gov.uk or write to Room 2.6.2, Civic Centre, Oystermouth Road, Swansea, SA1 3SN”. For example, we undertook consultation
on the Candidate Sites for 12 months and an extra consultation stage to guidance, on the draft proposals map. After all consultations the Strategic Planning Team has revised documents based upon the consultation. Where appropriate the Team have gone back to Councillors for approval of the final, post consultation document. Or the consultation has informed the next stage of production. For example the candidate site comments were grouped and summarised, and then inserted into the candidate site assessment forms which helped the Officers assessing the sites. Then, the proposed allocations forms, inclusive of the summary of responses, were made available on our website.

In accordance with Regulation 17 an Initial Consultation Report (http://www.swansea.gov.uk/media/17354/Initial-Consultation-Report/pdf/Initial_Consultation_Report.pdf) was published to accompany the Deposit Plan consultation stage, which reported on the various Pre-Deposit Stages, inclusive of responses to the representations we received. The public consultation on the Deposit LDP formally ran from 18th July – 31st August 2016. Full details of the specific methodology, inclusive of a detailed series of responses by Officers to representations made can be found within the Deposit LDP Consultation Report. The Consultation Report is a formal stage of the LDP and has been prepared in accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2015. The Deposit Local Development Plan Consultation Report will be made available via: www.swansea.gov.uk/ldp.

Any actions required (to mitigate adverse impact or to address identified gaps in knowledge).
1. To conduct LDP monitoring as set out in Monitoring Framework.
2. Ensure consultation is undertaken in line with Welsh Government LDP guidance.
Section 4 - Other Impacts

Please consider how the initiative might address the following issues. You could base this on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

<table>
<thead>
<tr>
<th>Foster good relations between different groups</th>
<th>Advance equality of opportunity between different groups</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elimination of discrimination, harassment and victimisation</td>
<td>Reduction of social exclusion and poverty</td>
</tr>
</tbody>
</table>

(Please see the specific Section 4 Guidance for definitions on the above)

Please explain any possible impact on each of the above and What work have you already done to improve any of the above?

**Foster good relations between different groups**
It would be difficult to establish a tangible link between fostering good relations between different groups, and the Local Development Plan. However, as mentioned design policies do aim to foster cohesive communities. Community facilities such as community centres or schools, open spaces, inclusive of play areas, are encouraged through Local Development Plan policy with new development, subject to identified need and appropriate scale of development.

**Elimination of discrimination, harassment and victimisation**
It would be equally difficult to establish a direct and tangible link between the elimination of discrimination, harassment and victimisation, and the Local Development Plan. Although community safety policies do attempt to reduce the potential of crime through better design of the built environment. For example the *Placemaking and Place Management* policy contains criteria on Natural Surveillance and the *Community Safety* policy highlights various measures for new development to incorporate to promote safe and secure communities. Similarly design policies aim to foster cohesive communities through the built environment as set out in the Future Generations Act.

**Reduction of social exclusion and poverty**
The reduction of social exclusion and poverty through the built environment can be encouraged through various mechanisms in the Local Development Plan. For example, the *Active Travel* Policy aims to ensure any new development designs for walking and cycling, linking to other developments and community facilities, creating a more accessible and extensive active travel network. Ensuring any new community facilities are accessible via walking or cycling will help to reduce the social exclusion of non-car households. Similarly, public transport accessibility is also promoted.

**Advance equality of opportunity between different groups**
The Local Development Plan, can indirectly advance equality of opportunity between different groups through various policies. The transport policies attempt to reduce barriers to access for those without a private car, through the *Active Travel* policy, similarly new development through *Placemaking and Place Management* policy and
*Masterplanning Principles* must ensure access and connections to essential services and community facilities.

**Is the initiative likely to impact on Community Cohesion? Please provide details.**
As featured in the *Masterplanning Principles* policy large developments can create exemplars of sustainable living and deliver the Welsh Government vision of healthy, cohesive communities set out in the Future Generations Act, the criteria of this policy seeks to deliver cohesive communities as far as the built environment is able.

**How will the initiative meet the needs of Welsh speakers and learners?**
The Welsh Language is highlighted within Planning Policy Wales and Technical Advice Note 20: Planning and the Welsh Language and the Local Development Plan reflects this guidance. There is a Policy specifically on development in Welsh Language Sensitive areas, the policy on *Sustainable Settlements* also highlights the importance of developments considering the language. As mentioned previously, the Council is also subject to the Welsh Language Standards, as of 30th March 2016.

**Actions (to mitigate adverse impact or to address identified gaps in knowledge).**
None, required.
Section 5 - United Nations Convention on the Rights of the Child (UNCRC)

In this section, we need to consider whether the initiative has any direct or indirect impact on children. Many initiatives have an indirect impact on children and you will need to consider whether the impact is positive or negative in relation to both children’s rights and their best interests.

Please visit [http://staffnet/eia](http://staffnet/eia) to read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people? If not, please briefly explain your answer and proceed to Section 6.

There are various indirect impacts the LDP will have on young people.

Is the initiative designed / planned in the best interests of children and young people? Please explain your answer.

*Best interests of the child (Article 3)*: The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Yes, the Local Development Plan is informed by various pieces of national guidance, inclusive of the Wellbeing of Future Generations Act. The LDP does take action on a number of issues that would positively affect young people. For example, promotion and expansion of an active travel network will enable young people (who don’t have access to their own car until 17) to be able to independently access various opportunities. The team have also consulted with various groups that represent children and young people inclusive of the Swansea Children and Young People Partnership until it’s disbandment, the Children’s Commissioner for Wales, InfoNation, and Children in Wales. In terms of education we have been working very closely with our education colleagues to ensure new development have the appropriate level of available school places, and where necessary new facilities.

**Actions (to mitigate adverse impact or to address identified gaps in knowledge).**

None required.
Section 6 - Monitoring arrangements

Please explain the arrangements in place (or those which will be put in place) to monitor this initiative:

Monitoring arrangements: The LDP has a formal monitoring process set out by Welsh Government guidance that must be followed.

In order to monitor the effectiveness of the LDP in achieving the implementation of the LDP Objectives and Policy outcomes, the LDP must be considered against a number of monitoring issues. These issues will be set out in the LDP Monitoring Framework. The Monitoring Framework takes into account the statutory requirements that must be included within the Framework and a number of local issues specific to the City & County of Swansea in order to identify a number of criteria that will enable the Council to monitor the effectiveness and outcomes of LDP.

Actions: Undertake the Annual Monitoring Framework as directed by Welsh Government. The results of the Annual Monitoring review process will feed into the ongoing review of the LDP. A major review of the LDP must be undertaken every 4 years following first and any subsequent adoption dates.
Section 7 – Outcomes

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern
Outcome 2: Adjust the initiative – low level of concern
Outcome 3: Justify the initiative – moderate level of concern
Outcome 4: Stop and refer the initiative – high level of concern

This section will be completed once the Local Development Plan has been adopted.
Section 8 - Publication arrangements

On completion, please follow this 3-step procedure:

1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk
2. Make any necessary amendments/additions.
3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council’s website - this is a legal requirement.
**Action Plan:**

<table>
<thead>
<tr>
<th>Objective - What are we going to do and why?</th>
<th>Who will be responsible for seeing it is done?</th>
<th>When will it be done by?</th>
<th>Outcome - How will we know we have achieved our objective?</th>
<th>Progress</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure consultation is undertaken in line with Welsh Government LDP guidance</td>
<td>Planning Policy Team</td>
<td>LDP Inspection</td>
<td>If consultation report accepted by independent Welsh Government Appointed Inspector</td>
<td></td>
</tr>
<tr>
<td>To conduct LDP monitoring as set out in Monitoring Framework</td>
<td>Planning Policy Team</td>
<td>Annual monitoring report with a major review every 4 years.</td>
<td>Publication of monitoring reports.</td>
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</tbody>
</table>

* Please remember to be ‘SMART’ when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).