



## Derbyshire Dales District Council

### Initial Equality Impact Assessment

<b>Title of policy, practice, service or function being assessed</b>	Derbyshire Dales Local Plan Pre Submission Draft
<b>Officers conducting assessment</b>	Mike Hase, Planning Policy Manager Sarah Newton, Policy Analyst
<b>Date of assessment</b>	May 2013
<b>Reason for assessment</b>	Change in policy
<b>Equalities Lead Officer</b>	Giles Dann, Policy & Economic Development Manager

#### **Purpose, aims and objectives of the policy, practice, service or function under impact assessment**

##### **Background**

The District Council is the local planning authority for that part of the Council's jurisdiction that is situated outside the Peak District National Park. It is in the process of preparing a Local Plan that will supersede the current Derbyshire Dales Local Plan which was adopted by the District Council in November 2005 and set the policies for the use and development of land for the period 2006-2028.

The purpose of this Equalities Impact Assessment (EIA) is to assess the potential equalities impacts of the policies and proposals to be included within the emerging Derbyshire Dales Local Plan prior to public consultation. The draft plan includes both the overall strategic policies and the more detailed development management policies that will be used to assist the District Council as local planning authority in the determination of planning applications.

Initially it had been agreed that a Joint Derbyshire Dales and High Peak Joint Core Strategy would be prepared. Consultation on the preparation of a Joint Core Strategy was undertaken prior to 2012 on the following stages:

- Issues and Options (March 2009)
- Growth Options (August 2009)
- Derbyshire Dales and High Peak Joint Core Strategy Draft Plan (June 2010)

During the consultation on the Derbyshire Dales and High Peak Joint Core Strategy Draft Plan 1331 comments were received from 434 individuals and organisations on a range of topics, some supporting the contents of the plan while others raised concerns with some aspects of the draft plan. A summary of the representations received were presented to the Derbyshire Dales and High Peak Core Strategy Joint Advisory Committee on 5<sup>th</sup> January 2011.

However, in April 2012 it was agreed that the preparation of a Joint Core Strategy would cease and that both local planning authorities would prepare separate Local Plans for their areas. Council agreed at that time that priority should be given to the identification of the District Council's housing requirements for the period up to 2028, both in terms of the overall numbers and the allocation of land to satisfy these requirements.

An extensive consultation exercise was held during Summer 2012 that sought to seek views on the overall level of housing being proposed and a suite of sites that were considered to have potential for residential development across the plan area. As a result of the consultation exercise, having taken account of the recommendations on site priorities from the Local Plan Advisory Committee, the Council resolved on 14<sup>th</sup> February 2013 to allocate 12 sites in the Derbyshire Dales Local Plan for residential development.

In order to take forward the Local Plan it is necessary to agree the remaining policies for the use and development of land to be included within the Draft Derbyshire Dales Local Plan. A report was presented to the Local Plan Advisory Committee on 23<sup>rd</sup> April 2013 which set out a series of 14 Strategic Policies, 23 Development Management Policies, 3 Sub Area Strategic Policies and 12 Site Specific Policies. The draft policies are due to be considered by Council on 9 May, following which they will be subject to a six week public consultation. The results from the consultation will be used to inform the final Local Plan policies, taking into account any equalities issues raised.

The 14 draft Strategic Policies (providing the policy framework for the plan as a whole) are set out below. It should be noted that National Planning Policy Framework - Presumption In Favour Of Sustainable Development – is recommended for inclusion in all Local Plans by the Planning Inspectorate, and is one which seeks to ensure that the District Council takes a positive approach to development proposals, in light of the advice contained within the NPPF. The strategic policies have been prepared within this context.

Strategic Policy 1 (SP1) – Sustainable Development Principles – Seeks to ensure that all development makes a positive contribution towards achieving sustainable development by setting out the key measures the District Council will use to achieve it.

Strategic Policy 2 (SP2) – Settlement Hierarchy – This policy identifies the key settlements across the plan area where the Council will seek to direct and allow new development.

Strategic Policy 3 (SP3) – Protecting And Enhancing The Natural And Historic Environment – This policy seeks to ensure that appropriate protection is given to the high quality environment which exists across the plan area.

Strategic Policy 4 (SP4) – Maintaining And Enhancing An Economic Base – Enabling economic growth across the plan area is a key tenet of the Council's Corporate Plan and a key element within the Government's definition of sustainable development. This policy seeks to encourage opportunities for growth within the local economy.

Strategic Policy 5 (SP5) – Promoting Peak District Tourism And Culture – Tourism is a key driver within the local economy, and this policy seeks to ensure that the decisions the Council takes strengthens its role within the local economy.

Strategic Policy 6 (SP6) – Retail, Leisure & Other Commercial Development – Vibrant town centres are also important for the local economy, and this policy seeks to ensure that new retail, commercial and other development enhances their vitality and viability.

Strategic Policy 7 (SP7) – Strategic Housing Development – Ensuring there is adequate provision and the right type of housing is important to meeting local needs as well as having economic benefits. This policy sets out the scale of new residential development required across the plan area.

Strategic Policy 8 (SP8) – Climate Change – Mitigating Climate change is an important element of delivering sustainable development. This policy seeks to set out support for the Governments' position on ensuring that climate change has been addressed appropriately as part of new developments and supporting in appropriate circumstances renewable energy installations.

Strategic Policy 9 (SP9) – Open Space And Outdoor Recreation Facilities – Open space and recreation facilities are important to the health and well being of the residents of the area, as well

forming an important attractor for visitors. This policy seeks to protect and enhance facilities.

Strategic Policy 10 (SP10) –Accessibility – This policy seeks to ensure that new development is located where there are opportunities to access services and facilities without being overly reliant upon the car. The policy also seeks to encourage projects that increase the range of opportunities to access services and facilities other than by car.

Strategic Policy 11 (SP11) – Matlock / Wirksworth Sub Area – This policy sets out the aspirations for the sustainable development of the Matlock/Wirksworth Sub Area and includes ensuring that there is sufficient housing provided to meet the needs of the area, support for the local economy including seeking to enhance the town centres of Matlock & Wirksworth as well the continued growth of the World Heritage site, the National Stone Centre and Matlock Bath as visitor attractions.

Strategic Policy 12 (SP12) – Ashbourne Sub Area - This policy sets out the aspirations for the sustainable development of the Ashbourne Sub Area and includes ensuring that there is sufficient housing provided to meet the needs of the area, support for the local economy including seeking to enhance Ashbourne town centre, as well as increasing the capacity for school places at Queen Elizabeth's Grammar School.

Strategic Policy 13 (SP13) – Southern Parishes Sub Area - This policy sets out the aspirations for the sustainable development of the Southern Parishes Sub Area and includes ensuring that there is sufficient housing provided to meet the needs of the area, seeking to improve access to services and facilities for the communities in the area and delivering a replacement for Brailsford Primary School.

Strategic Policy 14 (SP14) – Infrastructure – The growth of the area requires that there is sufficient infrastructure to meet the needs of existing and new residents and businesses. This includes ensuring that there are adequate healthcare and education facilities for new development to access as well ensuring that the provision of high speed fibre broadband is catered for where it can be through development proposals.

**Are there any other organisations involved in its implementation?**

- *Derbyshire County Council*
- *Derbyshire NHS*
- *Private Sector Developers*
- *Housing Associations*
- *Utility Companies and Other Infrastructure Providers*
- *Businesses*
- *Sport England*
- *Natural England*
- *English Heritage*
- *Derbyshire Wildlife Trust*
- *Parish Councils (possible open space, allotments, community buildings etc etc)*

**Main customer groups (beneficiaries) / stakeholders**

<p>Customer Groups:</p> <ul style="list-style-type: none"> <li>• Local residents</li> <li>• Local businesses</li> <li>• Planning applicants</li> <li>• Planning Agents</li> <li>• Landowners</li> <li>• Public &amp; Voluntary Sector organisations based in the Dales</li> </ul>	<p>Other stakeholders:</p> <ul style="list-style-type: none"> <li>• Council Members</li> <li>• Parish and Town Councils</li> <li>• Statutory bodies e.g. PDNPA</li> <li>• Neighbouring authorities</li> <li>• English Heritage, National Trust</li> <li>• Housing organisations e.g. Dales Housing, RSLs</li> <li>• Community / resident groups in the Dales</li> <li>• Peak District Partnership</li> <li>• Derbyshire County Council</li> <li>• Countywide and local networks e.g. 50+ Forums, BME, LGBT forums, DCIL</li> <li>• LEPs</li> <li>• NHS</li> <li>• Sports and recreation groups</li> <li>• Visitors</li> <li>• Utility Providers</li> <li>• Derbyshire NHS</li> </ul>
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**Which other District Council departments are affected by the policy, practice, service or function? Do any of the objectives directly support or hinder another activity?**

- Housing - the Council's Housing Strategy needs to align with the Local Plan. The Plan will be key to realising the Council's priority of providing Housing which meets local needs
- Development Control – the Local Plan will provide the policy framework for determining planning applications
- Property Services – policies within the Local Plan will affect any future development proposals within the Council's estate
- Customer Services – initial point of contact regarding planning applications
- Community Safety – spatial and design policies can affect how safe people feel. In this regard the Local Plan should help the Council deliver its priority of Safe and healthy communities
- Leisure – The Local Plan should help the Council deliver its priority of Safe and healthy communities
- Economic Development – the Local Plan should support the Council's priority to develop a Prosperous local economy and encourage business growth
- Environmental Health – The Local Plan supports the provision of sites for gypsies and travellers where required; supports the remediation of contaminated land and seeks to ensure that development does not result in noise or other nuisances
- Legal – the preparation of a Local Plan is a statutory requirement for the District Council,

and must be prepared in accordance with the relevant legislation

<b>Assessing relevance to the public sector Equality Duty</b>	
<p>The general Equality Duty has three aims which require the District Council to have due regard to the need to:</p> <ul style="list-style-type: none"> <li>• eliminate unlawful discrimination (both direct or indirect), harassment and victimisation;</li> <li>• advance equality of opportunity between all persons i.e. removing or minimising disadvantages suffered by protected groups; taking steps to meet the needs of people from protected groups where these are different from the needs of other people and encouraging people from protected groups to participate in public life or other activities where participation is disproportionately low;</li> <li>• foster good relations between all persons i.e. tackling prejudice and promoting understanding between people from different groups.</li> </ul> <p>Which aims of the Equality Duty is the policy, practice, service or function relevant to?</p>	<p>The Draft Local Plan relates to all three aims of the Equality Duty but in particular:</p> <p>Advancing equality of opportunity and eliminating discrimination</p>

<b>What evidence is already available or needed to help establish the impact of the policy, practice, service or function on protected groups? (Include consideration of relevant data and research available locally and nationally; monitoring information; performance information; previous consultation and engagement e.g. residents' surveys, satisfaction surveys, focus groups; access to services data; complements and complaints; previous equality assessments. When considering gaps, think about any additional monitoring arrangements needed and the need for further consultation).</b>				
<b>Information / Data</b>	<b>When and how collected</b>	<b>Source</b>	<b>What it tells you</b>	<b>Gaps</b>
<p>Derbyshire Dales Evidence Base. An extensive range of studies has been undertaken since 2007 to inform the Local Development Framework within the Peak Sub Region</p>	<p>Derbyshire Dales and High Peak Sustainable Community Strategy (2009-14)</p> <p>Derbyshire Dales Rural Accessibility Study (2009)</p> <p>Green Infrastructure Assessment</p>	<p>The details of these reports can be accessed on our website at:  <a href="http://www.derbyshiredata.gov.uk/planning-a-building-control/planning-policy/local-plan/evidence-base">http://www.derbyshiredata.gov.uk/planning-a-building-control/planning-policy/local-plan/evidence-base</a></p>	<ul style="list-style-type: none"> <li>• How the district works in spatial terms and how it deals with places and their relationships with each other;</li> <li>• The main issues, problems and opportunities including: rurality / access to services; need for affordable housing and a range of types; providing higher quality, accessible local employment opportunities; encouraging micro-business growth; providing opportunities for younger people; ensuring adequate facilities and support for the ageing population; keeping crime levels low; encouraging healthy lifestyles; maintaining the high quality environment; ensuring development is sustainable and helping mitigate against climate change</li> <li>• The local distinctiveness of the area;</li> <li>• The changes that are likely to affect the area over the period to 2028;</li> <li>• All relevant national and regional policies and proposals that have a bearing on the use of space within the District</li> </ul> <p><u>Key information drawn from the evidence base is set out below:</u></p>	

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Information / Data	When and how collected	Source	What it tells you	Gaps
	<p>(2009)</p> <p>Peak Sub Region PPG17 Open Space, Sport and Recreation Study ( 2009)</p> <p>Peak Sub Region Retail Study and Town Centre Assessment (2009)</p> <p>Peak Sub Region Strategic Housing Land Availability Assessment (2009) Updated in 2011</p> <p>Derbyshire Gypsy and Traveller Accommodation Assessment (2008)</p>		<p><u><a href="http://www.derbyshiredales.gov.uk/images/documents/R/Rural%20Accessibility%20Study%20-%20Part%201.pdf">http://www.derbyshiredales.gov.uk/images/documents/R/Rural%20Accessibility%20Study%20-%20Part%201.pdf</a></u>  <u><a href="http://www.derbyshiredales.gov.uk/images/documents/R/Rural%20Accessibility%20Study%20-%20Part%202.pdf">http://www.derbyshiredales.gov.uk/images/documents/R/Rural%20Accessibility%20Study%20-%20Part%202.pdf</a></u></p> <p>Derbyshire Dales District Council and Derbyshire County Council carried out the study jointly. This study identifies the main travel routes in the District and assesses the need to improve the services to meet local needs. The main findings of the study indicated that the key service and facility destinations lay outside the study area, but that car ownership and usage was high. This combined with the sparsely populated nature of the area, means that those experiencing difficulty in accessing services and facilities are individual households spread across the study area.</p> <p>The study also found that there was a relatively older population living in the study area than the UK average, with more people noted to be retired. There were less full-time employed people within the study area than UK average, but relatively little unemployment, few people identified transport problems as being a barrier to obtaining employment, or in accessing services and facilities, car ownership within the study area exceeds national averages, and car usage (for all trip purpose types) is high, though there were few facilities within the study area itself, there appeared to be evidence of usage of independent food deliveries (though not by internet) across the study area, of the comments received on the questionnaire focused on a lack of traditional bus services, there is some evidence of connection activity between CT and rail users, key destinations for all trip purposes were found to be Derby, Ashbourne, Mickleover and Uttoxeter. However, there is greater variation for health-related facilities.</p> <p>The community workshops found that a lack of information on services available limits some peoples' access to services and facilities. This was found in the form of information being absent, or people not knowing where to get information, a lack of footpaths to key facilities</p>	

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Information / Data	When and how collected	Source	What it tells you	Gaps
	<p>Peak Sub Region Employment Land Review (2008)</p> <p>Ashbourne Economic Assessment (2007)</p> <p>Peak Sub Region Housing Needs Survey (2007)</p> <p>Affordable Housing Viability Assessment (2007)</p> <p>Peak Sub Region Strategic Housing Market Assessment (2008)</p> <p>Derbyshire Dales Strategic</p>		<p>(e.g. bus stops, schools, pubs etc) restricted access, particularly as walking on the carriageway is perceived as dangerous in many places, for access to many facilities / services, the car is perceived as the only option for travel. Car sharing does take place but is limited to informal arrangements, "buses don't fit" (both destinations and travel-demand times) is a feeling echoed by many persons as services often run only on specific days during the week, limiting when people can travel. This increases the potential for people to rely on cars, inter village travel, "just doesn't happen", Community Transport is well used but there is still some confusion regarding the service available, transport can be expensive (e.g. home – hospital rides), education can usually be accessed by school bus but some parents prefer to transport children by car. After school clubs, adult education and post 16 travel may require car use, delivery services are available but vary between settlements. Some services are "thought" to exist, but not definitively known about.</p> <p>The outcome of this study clearly shows that in the southern part of the plan area that access to services and facilities is particularly difficult for those without a car. The elderly and young are particularly vulnerable groups living in this area of the Local Plan in terms of access to healthcare and training/employment opportunities.</p> <p><u>Derbyshire Gypsy and Traveller Accommodation Assessment (2008)</u>  <a href="http://www.derbyshiredales.gov.uk/images/documents/G/Gypsy%20and%20Traveller%20Accommodation%20Assessment.pdf">http://www.derbyshiredales.gov.uk/images/documents/G/Gypsy%20and%20Traveller%20Accommodation%20Assessment.pdf</a></p> <p>The Derbyshire Gypsy and Traveller Accommodation Assessment was commissioned by Derbyshire Traveller Issues Working Group. The main objective of the study was to assess the need for additional authorised Gypsy and Traveller site provision within Derbyshire over the next five years.</p> <p>The main findings of the study indicated that based upon the evidence presented in the report, the estimated extra provision that is required for Gypsies and Travellers in the next 5 years in Derbyshire is 58 pitches. This figure should be seen as the minimum amount of provision</p>	



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	<p>Flood Risk Assessment (2008)</p> <p>Strategic Housing Options (2012)</p>		<p>which is necessary to meet the identifiable needs of the population.</p> <p>For Derbyshire Dales it recommended that there was a need for 2 pitches to meet the needs of travellers for the period 2007-2012 For the period 2012 the study suggests that if the population of Gypsies and Travellers in Derbyshire continues to grow at around 3% per annum then an extra 15 new pitches will be required every 5 years to met the needs of newly forming households.</p> <p>The outcome of this study indicates that the level of need for sites for gypsies and travellers is very limited across the Local Plan area. Nevertheless it is an issue that the Local Plan will need to address, in terms of making suitable provision.</p> <p><u>Peak Sub Region Employment Land Review (2008)</u></p> <p><a href="http://www.derbyshiredales.gov.uk/images/documents/P/Peak%20Sub%20Region%20Employment%20Land%20Review.pdf">http://www.derbyshiredales.gov.uk/images/documents/P/Peak%20Sub%20Region%20Employment%20Land%20Review.pdf</a></p> <p>The Peak Sub Region Employment Land Review has assessed the suitability of continued or potential use for economic purposes of a range of sites across the Peak Sub Region up until 2026. It reviewed the supply of employment land in both qualitative and quantitative terms and also identified new potential sites and concluded that The current stock of employment floor space in Derbyshire Dales is relatively small in comparison with nearby districts. The stock is dominated by manufacturing and warehousing premises and the small proportion of commercial office provision is typically in small, older units. Matlock and Ashbourne are the largest centres with respect to employment premises. Take-up of employment land has historically been very low. It recommended that in order to facilitate the growth of indigenous businesses and the knowledge-based and creative sectors, it will be important to ensure that appropriate sites and premises are available, and that 16.0ha of employment land be provided for the period up to 2026.</p> <p>This study suggested that, given the changes in the population structure across the plan area</p>	

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			<p>that in fact the amount of land required to meet future needs may be less than the existing provision – however in order to ensure that opportunities exist for young people to access jobs and training in sustainable locations, that there needs to be a continuing supply of new employment land.</p> <p><u>Peak Sub Region Strategic Housing Market Assessment (2008)</u></p> <p><a href="http://www.derbyshiredales.gov.uk/images/documents/P/Peak%20Sub%20Region%20Housing%20Market%20Assessment.pdf">http://www.derbyshiredales.gov.uk/images/documents/P/Peak%20Sub%20Region%20Housing%20Market%20Assessment.pdf</a></p> <p>The document examines the balance between housing supply and demand; the scale of need and demand for affordable and market provision; to what extent affordability is an issue in the area and to what extent high demand is an issue within the area in order to inform the spatial planning process and housing strategies. The main conclusions were that in Derbyshire Dales the economy is reliant on the service sector to a large extent with 70% of the population working in private and public service such as tourism, retailing, hotel and catering education and administration. Unemployment rates are low and levels of deprivation are low. However, wages are also relatively low compared to the national average making affordable housing for local people an important issue.</p> <p>It also found that there are significant challenges in the provision of affordable housing within the area compounded by the aging population, net out-migration of young people, increasing second home ownership, and increasing house prices (at least until the recent national downturn in the housing market, precipitated by the recent major contraction in the financial lending market, aka “The Credit Crunch”).</p> <p>The Peak Sub Region SHMA made six recommendations;            Recommendation 1: Work to Identify and Maintain Flow of Residential Land Supply            Recommendation 2: Increase the Contribution made to the Provision of Affordable Housing through Section 106 Policies            Recommendation 3: Policies for the Mix of Market Housing</p>	

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			<p>Recommendation 4: The Tenure and Size Mix of Affordable Housing  Recommendation 5: Maximise the Provision of Affordable Housing through Exception Sites  Recommendation 6: Planning for an Aging Population</p> <p>The outcomes of the SHMA clearly indicates that access to housing is a key issue for the Local Plan to address to ensure that vulnerable groups such as the young and the elderly are provided for over the plan period.</p> <p><u>Sustainable Community Strategy</u></p> <p>The Sustainable Community Strategy was developed following consultation with local people and partner organisations to ensure it reflects local priorities. Key challenges identified by the Strategy include:</p> <ul style="list-style-type: none"> <li>▪ Ensuring the provision of affordable, decent housing for local people</li> <li>▪ Supporting our future generations by providing positive social, developmental and economic opportunities</li> <li>▪ Developing an economy that provides higher wage / higher skill jobs</li> <li>▪ Ensuring people's older years are happy and healthy</li> </ul> <p>Improving access to services and rural transport, embedding climate change and reducing crime are cross cutting themes.</p> <p>The Local Plan links directly back to the Community Strategy and aims to be a 'spatial expression' of it within the Derbyshire Dales.</p>	
<p>Consultation with a wide range of customers i.e members of the public, statutory consultees such as English</p>	<p>Four distinct phases of consultation have been undertaken</p> <ul style="list-style-type: none"> <li>• Issues and Options (March 2009)</li> <li>• Growth</li> </ul>	<p>During the Issues and Options Consultation 145 individuals or organisations responded and between them made 1,234 comments. These comments were analysed in detail by the Joint Derbyshire Dales</p>	<p>The consultation exercise identified some concerns about the location (and scale) of some of the potential growth options but comments were also made about the overall development strategy.</p> <p>There were a number of comments made which suggested that, in terms of achieving sustainable development and maximising opportunities for development on previously developed land, the development strategy should focus solely upon the Market Towns.</p> <p>Other comments received suggested that rather than concentrating</p>	<p>Efforts will be made to engage with harder to reach groups during consultation on the draft Plan using available networks</p>

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<p>Heritage, Environment Agency, Natural England, landowners, developers and their agents and stakeholders.... using a variety of methods including public exhibitions and public meetings in accessible locations, community conversations, online at <a href="http://www.derbyshiredales.gov.uk">www.derbyshiredales.gov.uk</a></p>	<p>Options (August 2009)</p> <ul style="list-style-type: none"> <li>Derbyshire Dales and High Peak Joint Core Strategy Draft Plan (June 2010)</li> <li>Derbyshire Dales Local Plan Housing Issues and Options (June 2012)</li> </ul>	<p>and High Peak Core Strategy Advisory Committee in July 2009 and dealt with matters that covered the whole of the plan area</p> <p>During the Growth Options Consultation 1500 responses were received to the consultation. The vast majority of comments were received from individuals who have not previously been involved in any consultations. A large number of comments concerned about the draft proposals were received from residents living in Hulland Ward, Brailsford, and Doveridge.</p> <p>During the consultation on the Derbyshire Dales</p>	<p>development in a few settlements, there should be a more even distribution across all settlements, including those smaller ones with more limited services and facilities.</p> <p>Many of the responses to the consultation were concerned that infrastructure was not in place to accommodate new development or that, at this time, there were no planned improvements to infrastructure and other associated services and facilities required to support new development. Many respondents recognised the need for more homes but the level of the requirement was a concern</p> <p>The areas of greatest concern came in respect of the housing proposals, specifically in the Matlock/Wirksworth area. The majority of comments came in respect of the proposal for 30 dwellings in Tansley – suggesting that the number was too many on top of the existing planning permissions, that housing should be restricted on green fields, and that the village has poor infrastructure and poor public transport to the wider area. Furthermore there was a concern that Darley Dale, a larger settlement, was not getting any new housing allocations.</p> <p>In the Ashbourne Sub Area there was equal support for development on an extension to Ashbourne Airfield and a greenfield site on the southern side of the town. Main areas of concern related to: QEGS Capacity; Traffic congestion and car parking in the town centre and the need for a new Bypass.</p> <p>In the Southern Parishes Sub Area in the villages of Brailsford and Hulland Ward, where concerns related to issues around poor public transport links, physical infrastructure, lack of shops and employment opportunities, and specifically for Brailsford that any housing in the village should not be linked to the provision of a new primary school for the village.</p> <p>The results of the Derbyshire Dales Local Plan Housing Issues and Options</p>	

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		<p>and High Peak Joint Core Strategy Draft Plan 1331 comments were received from 434 individuals and organisations on a range of the topics, some supports the plan and some indicating their concerns with the contents of the plan. The Joint Derbyshire Dales and High Peak Core Strategy Advisory Committee considered the consultation response at its meeting on 5<sup>th</sup> January 2011.</p>	<p>were considered by the Local Plan Advisory Committee over a series of meetings from November 2012 to January 2013.</p> <p>As a result of the consultation approximately 2,400 representations were received.</p> <p>The main areas of concern raised during the consultation on the Draft Core Strategy were about the number of new houses proposed to be allocated across the plan area, which according to the majority of residents was too high. There was also considerable concern about the sites, with most local residents raising concerns about the suitability of the sites for new residential development. Some comments were made that suggested that the provision of affordable housing would be adversely affected if the level of new housing development in the District was not set at a higher rate.</p> <p>Throughout each of the four rounds of consultation the main concerns have been around the location, number and type of housing to be provided through the Local Plan.</p> <p>From an equalities perspective issues that have arisen during the four consultation rounds relate to whether the proposed housing is in the most appropriate locations, whether it will be affordable – especially for the young, and whether there will be an appropriate level of provision to meet the needs of the growing elderly population across the plan area.</p>	
<p>Derbyshire Dales Equalities profile (available National and local data)</p>	<p>2011 Census data on age and gender</p>	<p>ONS</p>	<p>Proportion of 65+ well above national average (22.3% versus 16.3% England) and is forecast to increase further. Non working age population increased from 18.9% (2001) to 26.7% (2011). Lower proportion of younger people aged 16-24 (8.7%) compared to national position (11.9%).</p> <p>There remains a slightly higher proportion of resident females than males (similar regionally and nationally).</p> <p>Higher proportion of people who's day to day activities are limited (18.5%</p>	

**What evidence is already available or needed to help establish the impact of the policy, practice, service or function on protected groups? (Include consideration of relevant data and research available locally and nationally; monitoring information; performance information; previous consultation and engagement e.g. residents' surveys, satisfaction surveys, focus groups; access to services data; complements and complaints; previous equality assessments. When considering gaps, think about any additional monitoring arrangements needed and the need for further consultation).**

Information / Data	When and how collected	Source	What it tells you	Gaps
	2010	Annual Population Survey, ONS	<p>compared to 17.6% nationally) and a higher proportion providing unpaid care (12.7% versus 10.2% nationally)</p> <p>Proportion of White British residents well above national averages (96.8% versus 79.8%). A further 1.8% are from other white backgrounds.</p> <p>Higher proportion of residents with Christian beliefs (68.7% versus 64.1% nationally).</p> <p>24.4% of the working age population were disabled or had a work limiting disability which is above the national average (20.1%)</p> <p>The Dales equalities profile indicates that older people and people with disabilities remain priority groups.</p>	
Unemployment figures	Monthly Unemployment Statistics March 2013	ONS / compiled by DCC	<p>Whilst unemployment in the District remains the lowest in Derbyshire (1.5%) the unemployment rate for under 25 year olds is twice the working age average (2.8%). 25% of unemployed people are under the age of 25. Brailsford (5.4%) and Wirksworth (5.0%) have the highest rates of youth unemployment.</p>	
Index of Multiple Deprivation	2010	DCLG	<p>In terms of overall deprivation, the majority of the Dales falls within the 50% least deprived nationally. Matlock Hurst Farm (Lower Super Output Area) within Matlock St Giles ward is within the 20% most deprived areas nationally. This area is within the 10% most deprived in terms of overall income deprivation and within the 20% most deprived nationally with regard to children living in income deprived households.</p> <p>Regarding barriers to housing and services, which includes housing affordability, homelessness and overcrowding, and access to key local services e.g. shops, post offices and GPs, 16 of Derbyshire's 35 Lower Super Output Areas within the worst 20% nationally are in the Derbyshire</p>	

**What evidence is already available or needed to help establish the impact of the policy, practice, service or function on protected groups? (Include consideration of relevant data and research available locally and nationally; monitoring information; performance information; previous consultation and engagement e.g. residents' surveys, satisfaction surveys, focus groups; access to services data; complements and complaints; previous equality assessments. When considering gaps, think about any additional monitoring arrangements needed and the need for further consultation).**

Information / Data	When and how collected	Source	What it tells you	Gaps
Performance Indicators  Housing needs Assessments – disability?	2011/12	DDDC	Dales  PP3 - % of new homes built during the year which are affordable housing - <b>20.2%</b> NI 155 – No of affordable homes completed – <b>41</b> HSS 1a - No of affordable homes enabled (started on site) as a % of those needed – <b>34%</b> HSS1b – No of affordable dwellings enabled - <b>80</b> HSS11 – No of parish housing needs surveys completed - <b>5</b>	

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
<p>Does the policy, practice, service or function have a positive or negative impact on people of a particular <b>age</b> such as children, young people, older people? Describe how and which</p>	<p>SP1 &amp; SP2 promote new development in sustainable locations – thus ensuring access to services, facilities, employment opportunities and housing for &amp; by all ages</p> <p>SP4 – Provides new employment land to assist with the growth of the economy- will benefit young people by enabling access to local employment opportunities and new training facilities identified within the policy.</p> <p>SP6 – Seeks to protect and enhance the vitality and viability of local centres which provide for people's day to day needs – inclusive for all.</p> <p>DM9 – Seeks to ensure that proposals resulting in an under-supply of employment land in relation to identified needs will not be permitted – thus ensuring that opportunities for local job creation, particularly relevant for younger people who make up 25% of the unemployed, will be protected.</p> <p>SP7 – Seeks to ensure that the housing needs of all sections of the community are met including affordable housing (for those on a low wage regardless of their age) and housing for older people. It also ensures that new residential developments include a proportion of housing suitable for newly forming households.</p> <p>DM15 seeks to address the need for affordable housing and specifies a minimum requirement for residential developments based on the evidence base and consultation on housing options</p>	<p>None identified</p>			<p><i>Consider incorporating Lifetime Homes Standard within housing policy</i></p> <p><i>Consider specific reference to younger people within housing policy</i></p>



Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
	<p>SP9 – seeks to protect, maintain and enhance existing open spaces and recreation facilities. It ensures that there is a presumption against any development that involves a loss of sport , recreation, play facility or amenity green space unless it can be demonstrated that alternative facilities are of equal or better quality and equally accessible to all. It also seeks to improve the quantity, quality and value of play, sports and amenity green space provision in new developments – thus benefiting the whole community but particularly younger people.</p> <p>DM7 specifically sets out that the design and layout of new developments minimises the risk and fear of crime and disorder to ensure all members of the community feel safe. This will have a positive impact, particularly for children and older people</p> <p>DM13 – seeks to retain, and where possible to enhance the provision of community facilities and services, including halls, shops, post offices, nurseries, places of worship , care homes, libraries, public houses especially in the rural areas – again protecting local facilities often relied upon by older people, children and their parents</p> <p>SP14 – seeks to encourage investment in broadband across the plan area - helping, in the longer term, to improve access to services and economic opportunities for all ages</p>				
<p>Does the policy, practice, service or function have a positive or negative impact on <b>people with disabilities</b></p>	<p>SP1 &amp; SP2 promote new development in sustainable locations – thus ensuring access to services, facilities, employment opportunities and housing for &amp; by all, including those with</p>				<p><i>Consider incorporating Lifetime Homes Standard within housing policy</i></p>

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
<p>including people with physical disabilities, sensory impairments, limiting long-term illnesses, learning disabilities or mental health difficulties? Describe how and which</p>	<p>disabilities</p> <p>DM7 specifically sets out that the design and layout of new development caters for the special needs of people with disabilities, although much of the changes will be driven by Building Regs rather than through planning applications.</p> <p>DM10 sets out the criteria for Tourism Development and DM 11 sets out the criteria for chalets, caravans and campsite developments. Both policies set out that developments will only be granted where accessible by a variety of modes of transport</p> <p>SP10 – seeks to ensure that new development is well served by services and in such a way as to minimise the need to travel and promoting the use of public transport, including demand responsive transport where deficiencies exist which is likely to benefit those less mobile members of the community</p> <p>SP7 – Seeks to ensure that the housing needs of all sectors within the community are met, including affordable housing and housing for older people who may also be infirm or disabled and in need.</p> <p>DM13 – seeks to retain, and where possible to enhance the provision of community facilities and services, including halls, shops, post offices, nurseries, places of worship , care homes, libraries, public houses especially in the rural areas - retaining access to local facilities will benefit those with mobility problems</p>				<p><i>Consider specific reference to disabled parking standards within Access and Parking policy</i></p>

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
	<p>SP14 – Seeks to ensure that adequate provision is made for local infrastructure, including, where appropriate health and social care facilities that will be directly available to those with disabilities. Also it encourages the provision of broadband which in the longer term will enable access to services and facilities moving on-line.</p> <p>DM21 – requires new sport and recreational facilities to be accessible by people with disabilities and restricted mobility</p>				
<p>Does the policy, practice, service or function have a positive or negative impact on any <b>racial / minority ethnic groups</b>?</p> <p>Describe how and which</p>	<p>DM7 specifically sets out that the design and layout of new development minimises the risk and fear of crime and disorder. This will help all members of the community feel safe</p> <p>DM18 sets out the criteria for use in connection with the determination of planning applications for proposals involving gypsy and traveller sites. It takes a positive approach to the provision of sites, wherever there continues to be an unmet need for a site.</p>				
<p>Does the policy, practice, service or function have a positive or negative impact on <b>women or men</b> including those living in particular communities?</p> <p>Describe how and which</p>	<p>SP1 &amp; SP2 promote new development in sustainable locations – thus ensuring access to services, facilities, employment opportunities and housing for &amp; by all, including both women and men</p> <p>SP4 – sets out to encourage flexible working practices in the interests of maintaining and enhancing the economy of the area. This will benefit both women and men, particularly with caring responsibilities</p> <p>DM13 – seeks to retain, and where possible to enhance the provision of community facilities</p>				

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
	<p>and services, including halls, shops, post offices, nurseries, places of worship , care homes, libraries, public houses enabling them to be utilised by both women and men. As more women than men tend to have caring responsibilities, retaining facilities such as nurseries and care homes will have positive benefits</p> <p>SP14 – Seeks to ensure that adequate provision is made for local infrastructure, including, where appropriate health and social care facilities that will be directly available to both women and men. Also it encourages the provision of broadband which in the longer term will enable access to services and facilities moving on-line.</p> <p>SP7 – Seeks to ensure that the housing needs of all sections of the community are met, including providing affordable housing – this should benefit both newly forming and single parent households</p>				
<p>Does the policy, practice, service or function have a positive or negative impact on <b>pregnant women or people on maternity or paternity leave</b>? Please also consider any impacts on <b>breastfeeding mothers</b>. Describe how and which</p>	<p>SP14 – Seeks to ensure that adequate provision is made for local infrastructure, including, where appropriate health and social care facilities that will be directly available to those women who are pregnant or on maternity leave</p> <p>DM13 – seeks to retain, and where possible to enhance the provision of community facilities and services, including halls, shops, post offices and nurseries, enabling them to be utilised by pregnant women or women or men on maternity or paternity.</p> <p>SP10 – seeks to ensure that new development is well served by services and in such a way as</p>				

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
	to minimise the need to travel, promoting the use of public transport, including demand responsive transport where deficiencies exist – this is likely to enable access to the services and facilities that pregnant women and parents on maternity / maternity may require				
Does the policy, practice, service or function have a positive or negative impact because of a person's <b>marital status including civil partnership</b> ? Describe how and which			No differential impact identified.		
Does the policy, practice, service or function have a positive or negative impact on people with a particular <b>sexual orientation</b> ? Describe how and which			No differential impact identified.		
Does the policy, practice, service or function have a positive or negative impact on people with particular <b>religion or belief</b> ? Describe how and which	DM13 – seeks to retain, and where possible to enhance the provision of community facilities and services, including places of worship, thus ensuring that people can continue to practice their religious beliefs. The policy also supports new community provision which is well related to the community it is intended to serve which would be taken into account when considering applications for new places of worship				
Does the policy, practice, service or function have a positive or negative impact on <b>trans people or people planning to or going through gender reassignment</b> ? Describe how and which	SP14 – Seeks to ensure that adequate provision is made for local infrastructure, including, where appropriate health and social care facilities				

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
<p>Does the policy, practice, service or function have a positive or negative impact on <b>access for people in rural areas</b>?</p> <p>Describe how and which</p>	<p>SP1 &amp; SP2 promote new development in sustainable locations including a wide range of rural settlements – thus ensuring access to services, facilities, employment opportunities and housing for those living in rural areas.</p> <p>DM2 – Enables new development in the countryside where it supports the growth of agriculture, tourism or other rural based enterprises, and/or provides affordable housing for an identified local need.</p> <p>SP5 supports new tourist initiatives in the countryside through the reuse of existing buildings or as part of farm diversification, particularly where these would also benefit local communities and support the local economy.</p> <p>SP10 – seeks to ensure that new development is well served by services and in such a way as to minimise the need to travel and promoting the use of public transport, including demand responsive transport where deficiencies exist which is likely to benefit those members of the community in rural areas.</p> <p>SP7 – Seeks to ensure that the housing needs of all sectors within the community are met, including affordable housing in rural areas</p> <p>DM16 – specifically allows for affordable housing in rural areas as an exception to the normal policy of restraint in order to meet local needs</p> <p>SP4 – seeks to maintain and where feasible enhance the economic base of the plan area including support for re-skilling and training</p>				

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
	<p>facilities, and support for the tourism industry – which is most likely to benefit the rural parts of the plan area.</p> <p>SP14 – seeks to encourage investment in broadband across the plan area - helping, in the longer term, to improve access to services and economic opportunities for rural communities</p>				
<p>Does the policy, practice, service or function have a positive or negative impact on <b>other groups e.g. those experiencing deprivation or health inequalities?</b> Describe how and which</p>	<p>SP1, 2 &amp; 4 – promote employment development and provision of new employment land in sustainable locations, particularly the market towns which should benefit those living in the District's more deprived wards.</p> <p>DM13 – seeks to retain, and where possible to enhance the provision of community facilities and services, including halls, shops, post offices, nurseries, places of worship , care homes, libraries, public houses enabling them to be utilised by those without incurring considerable expenditure where they may be in deprivation.</p> <p>SP 7 – Sets out the housing requirements for the District over the plan period, and supports the provision of affordable housing to help those in greatest need and unable to afford property on the open market.</p> <p>DM15 &amp; DM16 set out the policies on the delivery of affordable housing to ensure that all those in need of housing and unable to afford market housing are provided for. The policy includes a target of 80% of affordable homes to be social rented and the balance intermediate housing. This will ensure that housing is accessible to all, particularly the low waged or</p>				

Protected Groups	Positive effects	Negative effects	No effect	Don't know	Improvement actions
	<p>those affected by Welfare Reform.</p> <p>SP10 – seeks to ensure that new development is well served by services and in such a way as to minimise the need to travel and promoting the use of public transport, including demand responsive transport where deficiencies exist which is likely to benefit those members of the community in deprivation.</p>				

<b>Outsourced services</b>	
<p>If your policy, practice, service or function is partly or wholly provided by external organisations/agencies, please list any arrangements to ensure that they promote equality and diversity (Include this in your improvement plan)</p>	<p><i>Are council policies built into contractual or service agreements?</i></p> <p>The implementation of the Derbyshire Dales Local Plan is dependant upon many organisations and agencies, many of whom such as Housing Associations and Derbyshire NHS are specifically meeting the needs of the most vulnerable groups – working in partnership with these organisations will ensure that the needs are being identified, and where appropriate met through the planning process.</p> <p>Furthermore all public bodies are bound by the Equality Duty and as such required to eliminate prohibited conduct towards protected groups.</p>
<b>Relations between different protected groups</b>	
<p>Does your assessment show that a policy, practice, service or function may amount to potential adverse impact between different protected groups? If yes please explain how the improvement plan is going to tackle this issue</p>	<p><i>Any adverse differential impacts should be addressed</i></p> <p>No</p>

<b><i>If an existing policy, practice, service or function, has it achieved its intended outcomes for the customer groups / stakeholders identified? If not, are there any equalities issues for protected groups?</i></b>
<p><i>N.B. If nothing additional to answers to key questions move on.</i></p> <p>See below.</p>



***If a new policy, practice, service or function, what factors could affect its intended outcomes from being achieved and are there any equalities issues for protected groups?***

*N.B. If nothing additional to answers to key questions move on.*

Some of the benefits of the new policies may not be delivered if the economic climate continues to have an adverse effect upon funding arrangements for such matters as affordable housing and public transport.

***Can you think of any intentional or unintentional factors that could contribute to negative or differential impact?***

*N.B. If nothing additional to answers to key questions move on.*

No

**Summarise the key issues resulting from this initial equality impact assessment and any measures identified to minimise or remove any adverse impact and promote equality of opportunity?**

**Key Issues:**

- The policies in the Derbyshire Dales Local Plan seek to ensure that the location of new development and the types of development that are brought forward over the plan period have a positive benefit for all members of the community, including seeking to provide for new employment opportunities, housing that meets the needs of all elements of the community. Furthermore the policies in the Derbyshire Dales Local Plan seek to retain existing services and facilities wherever feasible, thus ensuring that there is no resulting increased isolation
- Housing policies could be strengthened to further reflect the needs of the growing older population, people with disabilities and younger people
- No reference to ensuring adequate disabled parking provision within new developments

**Actions:**

- *Undertake a review of the EIA using the results from the public consultation to establish the need for any modifications to these policies prior to submission of the Derbyshire Dales Local Plan to the Secretary of State.*
- *Consider incorporating Lifetime Homes Standard within housing policy*
- *Consider specific reference to younger people within housing policy*
- *Consider specific reference to disabled parking standards within Access and Parking policy*

As part of the consultation, efforts will be made to engage with harder to reach groups using available networks e.g. 50+ Forums and Disability groups

**From the information gathered above, does the policy, practice, service or function discriminate (either directly or indirectly) against any protected groups? Explain why?**

No. However, consideration needs to be given to the results of the consultation exercise to fully assess the potential impact of the draft policies.

**Do you think this policy, practice, service or function should proceed to full EIA? Explain why**

*The full EIA process includes a stakeholder day to gain views on any key issues and the preparation of an action plan to address them.*  
 An equalities stakeholder day is not considered necessary. The policies within the draft Derbyshire Dales Local Plan address a wide range of issues, none of which are anticipated to have any adverse impact that would require a full stakeholder day to consider. Extensive consultation has already taken place to develop the housing policies within the plan and relevant stakeholders will be invited to send in representations during the forthcoming consultation. This will provide them with an opportunity to also identify any equalities issues at that time. The consultation results will therefore be used to finalise the EIA. As indicated, efforts will be made to engage harder to reach groups in the consultation to encourage them to have their say.

**PLEASE FORWARD THE COMPLETED FORM TO THE DISTRICT COUNCIL'S LEAD EQUALITIES OFFICER**

Signed \_\_\_\_\_ (Completing Officer) Signed \_\_\_\_\_ (Equalities Lead Officer)

Signed \_\_\_\_\_ (Completing Officer)