



Proposed Submission South Somerset Local Plan 2006 – 2028

Proposed Main Modifications Equality Analysis (EqA)

March 2014

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Equality Analysis (EqA) of Proposed Main Modifications to the Proposed Submission South Somerset Local Plan 2006 - 2028

1. Introduction

- 1.1 Following receipt of the Examination Inspector's Preliminary Findings in July 2013 a number of Main Modifications are proposed to be made to the Proposed Submission South Somerset Local Plan. In accordance with Section 149 of the Equality Act 2010 EqA has been carried out of these proposed Main Modifications. This has followed an iterative process with the draft Proposed Main Modifications produced in November 2013 subject to an Equality Analysis, and the final Proposed Main Modifications produced in March 2014 also subject to an Equality Analysis.
- 1.2 The Proposed Main Modifications were subject to consultation between 28 November 2013 and 10 January 2014. The Proposed Main Modifications were formally approved for submission by South Somerset District Council's Full Council on the 13th March 2014.

2. Report

Proposed Main Modifications Consultation Document, November 2013

- 2.1 A Stage 1: Screening and Summary Statement EqA has been carried out of the following Policies:
- SS3: Delivering New Employment Land
 - SS5: Delivering New Housing Growth
 - YV1: Urban Framework and Greenfield Housing for Yeovil
 - YV2: Yeovil Sustainable Urban Extension
 - YV6: Delivering Sustainable Travel at the Yeovil Sustainable Urban Extension
 - PMT2: Chard Phasing
 - PMT3: Ilminster Direction of Growth
 - HG5: Achieving a Mix of Market Housing
 - HG7: Gypsies, Travellers and Travelling Showpeople
- 2.2 This initial screening process identified that a Stage 2: Full Equality Analysis Assessment was required for Policy HG7: Gypsies, Travellers and Travelling Showpeople only. The Stage 1 screening is shown in Table 1 of this report, and Table 2 shows the Stage 2 Assessment of Policy HG7, this identifies that no potential negative equalities impacts have been identified.

Response to consultation on Proposed Main Modifications

- 2.3 In response to the representations received during the consultation period a number of minor amendments have been made to the Proposed Main Modifications. A Stage 1: Screening and Summary Statement EqA has been carried out of the further amended policies:
- SS3: Delivering New Employment Land
 - SS5: Delivering New Housing Growth
 - YV2: Yeovil Sustainable Urban Extension
 - YV6: Delivering Sustainable Travel at the Yeovil Sustainable Urban Extension

2.4 This initial screening process has indicated that no Stage 2 Assessments are required and no potential negative equalities impacts have been identified. The Stage 1 screening is shown in Table 3.

3. Conclusion

3.1 The Proposed Main Modifications to the Proposed Submission South Somerset Local Plan 2006-2028 have undergone a robust process of Equality Analysis. Analysis at November 2013 gave rise to a more detailed assessment to Policy HG7; the outcomes of that more in-depth review have been factored into the final policy wording. The Equality Analysis in March 2014 has not highlighted any further issues and no new mitigations were identified. Due regard has been given to the General Equality Duty and the Proposed Main Modifications to the Local Plan is sound in that respect.

Table 1: Stage 1 Screening of Proposed Main Modifications (November 2013)

Policy Number	Is this a change to service delivery? (including, withdrawal or reduction of services)	Does the *policy/strategy/function/service/ affect our workforce or employment practices	Is this a financial or budget decision that may affect any of the protected groups differently?	Could this policy or service and the way we deliver it affect some groups in society differently?	Does the policy / strategy / function service affect service users or the wider community?	Summary Statement and Comments
Policies where Main Modifications or point for clarification are proposed						
SS3 - Delivering New Employment Land	No	No	No	No	Yes	Proposed Submission Local Plan Policy SS3 underwent an Equality Analysis (EqA) as part of its formulation, as did the Policy as modified by Proposed Modifications M33-M34 in January 2013. A Stage 1 Equalities Impact Assessment was undertaken, which comprised a screening and summary statement, and at this stage it was considered that a Stage 2 Equalities Impact Assessment was not required. The revised Policy in terms of the identification of the amount of employment land required in Market Towns, Rural Centres and Rural Settlements and the approach to the delivery of employment land in Directions of Growth prior to

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						the adoption of the Site Allocations Development Plan Document has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.
SS5 - Delivering New Housing Growth	No	No	No	No	Yes	Proposed Submission Local Plan Policy SS5 underwent an Equality Analysis (EqA) as part of its formulation, as did the Policy as modified by Proposed Modification M74 in January 2013. A Stage 1 Equalities Impact Assessment was undertaken, which comprised a screening and summary statement, and at this stage it was considered that a Stage 2 Equalities Impact Assessment was not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.

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YV1 - Urban Framework and Greenfield Housing for Yeovil	No	No	No	No	Yes	<p>Proposed Submission Local Plan Policy YV1 underwent an Equality Analysis (EqA) as part of its formulation as did the Policy as a result of Proposed Modification M89 in January 2013. Following the addition work undertaken to address the issues raised by the Inspector in his Preliminary Findings the Proposed Main Modification removes the reference to 2,500 dwellings in a Single Urban Extension in Yeovil and refers only to the 1,565 dwellings to be delivered in the plan period at the Sustainable Urban Extensions. A Stage 1 Equalities Impact Assessment was undertaken, which comprised a screening and summary statement, and at this stage it was considered that a Stage 2 Equalities Impact Assessment was not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.</p>

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YV2 - Yeovil Sustainable Urban Extension	No	No	No	No	Yes	<p>Proposed Submission Local Plan Policy YV2 underwent a full Equality Analysis (EqA) as part of its formulation. The Policy underwent Stage 1 screening as a result of Proposed Modification M95 in January 2013. Following the additional work undertaken to address the issues raised by the Inspector in his Preliminary Findings the Proposed Main Modification introduces an additional Sustainable Urban Extension for Yeovil at Primrose Lane/Mudford. Across both sites (Coker and Primrose Lane / Mudford) 1,565 dwellings are to be delivered over the plan period. Reference to the Secondary School is proposed to be deleted from the policy although it is a requirement to meet the needs of the 7,441 dwellings to be delivered over the plan period in Yeovil as a whole. The education authority is unable to conclude the most appropriate location to satisfy Yeovil's long term needs. The scale of growth in the Sustainable Urban extensions</p>

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						<p>alone does not generate sufficient educational place demand to require a fourth secondary school within the plan period, however, contributions will be sought for secondary provision through CIL or Section 106 obligations, and the need for new provision will be reviewed during the plan period. At this stage it was considered that a Stage 2 Equalities Impact Assessment was not required.</p> <p>The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.</p>

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YV6 - Delivering Sustainable Travel at the Yeovil Sustainable Urban Extension	No	No	No	No	Yes	Proposed Submission Local Plan Policy YV6 underwent an Equality Analysis (EqA) as part of its formulation as did the Policy as a result of Proposed Modification M102 in January 2013. The Proposed Main Modification is consequential to the proposed Main Modification to Policy YV2. At this stage it was considered that a Stage 2 Equalities Impact Assessment was not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.

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PMT2 - Chard Phasing	No	No	No	No	Yes	<p>Proposed Submission Local Plan Policy PMT2 underwent an Equality Analysis (EqA) as part of its formulation, as did the Policy as modified by Proposed Modification M108 in January 2013. The Proposed Point of clarification identified by the Inspector in his Examination preliminary Findings (July 2013) identified that the Policy should not include a specific reference to the Chard Implementation Plan (2010) as the document has not been through a statutory process, the reference is therefore proposed to be removed. A Stage 1 Equalities Impact Assessment was undertaken, which comprised a screening and summary statement, and at this stage it was considered that a Stage 2 Equalities Impact Assessment was not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.</p>

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PMT3 - Ilminster Direction for Growth	No	No	No	No	Yes	Proposed Submission Local Plan Policy PMT3 underwent an Equality Analysis (EqA) as part of its formulation, as did the Policy as modified by Proposed Modification M118 in January 2013. Through Policy PMT3 the Council is seeking to accommodate Ilminster's assigned growth in a sustainable manner. Growth for Ilminster wherever located will serve to help sustain facilities and services in the centre and throughout the town. The Canal Way site is generally accessible to the town centre and particularly accessible to the Medical Centre and to school locations and has good pedestrian and cycling and public transport links and on relatively level gradients. Whilst the option is not as close to the centre as the Shudrick Valley Option it remains positively located in that regard and has compensatory benefits in relation to older persons given its access to the Medical Centre. On balance the

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						likely impact of differences in location between Canal Way and the previously appraised Shudrick Valley are not considered sufficiently different to require a different screening assessment from that given to Shudrick Valley in the original Equality Analysis. A Stage 1 Equalities Impact Assessment was undertaken, which comprised a screening and summary statement, and at this stage it was considered that a Stage 2 Equalities Impact Assessment was not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.

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HG5 - Achieving a Mix of Market Housing	No	No	No	No	Yes	<p>Proposed Submission Local Plan Policy HG5 (formerly HG4) underwent an Equality Analysis (EqA) as part of its formulation, and a Stage 2 Assessment was carried out. The Proposed Point of clarification identified by the Inspector in his Examination preliminary Findings (July 2013) identified that the Policy should not include a specific reference to the Strategic Housing Market Assessment as the document has not been through a statutory process, the reference is therefore proposed to be removed. A Stage 1 Equalities Impact Assessment was undertaken, which comprised a screening and summary statement, and at this stage it was considered that a Stage 2 Equalities Impact Assessment was not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.</p>

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HG7 - Gypsies Travellers and Travelling Showpeople	No	No	No	Yes	Yes	Proposed Submission Local Plan Policy HG7 (formerly HG6) underwent a Full Equality Analysis (EqA) as part of its formulation. Following the completion of the Gypsy and Traveller Accommodation Assessment Update 2013 the Policy has now been revised to include Pitch and Plot Targets to meet identified need within the Plan Period to 2028. It is considered that this modification results in the requirement to carry out a further Stage 2 Assessment.

Table 2: Stage 2 Assessment of Policy HG7, Proposed Main Modifications (November 2013)

Equality Analysis - Gypsy and Traveller Needs Assessment Update Somerset Local Planning Authorities, 2013 (GTAA Update) Stage 2:		
Outcome of Summary Statement: Low Impact		
Date of EqA: 12/9/13		
EqA Lead Officer: Jo Wilkins		
Why are you creating the EqA? Change to policy or service		
What are the main purposes and aims of the policy, strategy and service area?		
<p>In response Planning Policy for traveller sites issued by the CLG in March 2012 and the requirement to have a full understanding of the need to for Gypsy, Traveller and Showpeople sites over the whole of the plan period; De Montfort University in partnership with John Bloxsom were commissioned in May 2013 by the Somerset Authorities (South Somerset DC, Mendip DC, Sedgemoor DC, Taunton Deane BC and West Somerset Council) to undertake an update of the Somerset Gypsy Traveller Accommodation Assessment (GTAA) Final edit January 2011. With regards to South Somerset district the 2011 GTAA identified a need for 18 residential pitches between 2010 and 2020, 10 between 2010 and 2015 and 8 between 2015 and 2020. As well as the need for residential pitches a need to provide transit capacity for 10 caravans by 2015 was identified. The assessment also highlighted a need for 4 additional Showmen's Yards across Somerset. The 2013 update provides pitch and plot requirement figures through the plan period up until 2032.</p> <p>The GTAA Update identifies the following residential requirement for South Somerset</p> <p>Additional Residential Pitch Requirements South Somerset</p> <p>Year Additional pitches required</p> <p>2016 - 2020 8</p> <p>2021 - 2015 9</p> <p>2016 - 2030 11</p> <p>2030 - 2032 5</p>		
Evidence:		
<p>A largely desk based methodology was used and was considered to be appropriate in this instance because the previous GTAA was based on 157 surveys as well as focus group and other primary data. This information is sufficiently robust to allow for the update.</p> <p><u>Consultation with the Western section of the Showmen's Guild</u></p> <p>Visits to existing Sites</p> <p>Telephone interviews with Gypsy and Traveller Co-ordinators in Somerset</p>		
Part C - Conclusion:		
Date	Conclusion	Comments

12/9/13	Adjust the policy/ amend service	<p>Consultation with the Western section of the Showmen's Guild has identified a future need for 22 Showpeople plots across the County this would give rise to a need for 8 plots in South Somerset.</p> <p>With regards to transit provision the GTAA (2011) identified a need for 10 transit pitches in South Somerset this need remains.</p> <p>A residential pitch requirement of 23 pitches up until 2028 was identified.</p> <p>Paragraph 9.46 of the Proposed Submission South Somerset Local Plan 2006 - 2028 highlights that as the GTAA (2011) only identifies need up until 2020 it will have to be updated to establish the level of need beyond that date. The Inspector's original Examination question asked why the targets were not in the emerging Policy and this point was explained however, now that the 2013 Update has been completed it is necessary to amend the emerging Local Plan to reflect this specific new evidence.</p> <p>Proposed modified Policy HG7 will read as follows: Policy HG7: Gypsies, Travellers and Travelling Showpeople</p> <p>The accommodation needs of Gypsies, Travellers and Travelling Showpeople will be met by ensuring that they are accommodated in sustainable locations where essential services are available. By presenting justified targets meeting Gypsy, Traveller and Travelling Showpeople accommodation needs to 2028 the Proposed Modification to the Policy is seeking to ensure that the specific accommodation needs of the Gypsy, Traveller and Travelling Showpeople communities are met. This serves to ensure that these sections of the community are being treated in the same way as the settled community.</p> <p>Site allocations will be made to accommodate at least:</p> <p>23 Residential Pitches (from 2016 onwards) 10 Transit Pitches 6 Travelling Showpeople plots</p> <p>The following criteria will guide the location of sites:</p> <ul style="list-style-type: none"> • Significantly contaminated land should be avoided; • Development should not result in an adverse impact on internationally and nationally recognised designations (for example: Natura 2000 sites, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty); • The development should not have a significant adverse impact on the landscape character and visual amenity of the area; • The site is reasonably well related to schools and other community facilities; • The health and safety of occupants and visitors will not be at risk through unsafe access to sites, noise pollution or unacceptable flood risk; • There should be adequate space for on site parking, servicing and turning of vehicles; • The option of mixed residential and business use on sites will be considered where appropriate.
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		The number of pitches provided should be appropriate to the size of the site and availability of infrastructure, services and facilities in accordance with the general principles set out in the settlement hierarchy.	
General Equality Duty Met?	Date: 8/10/13		
	Liaised with Gypsy and Traveller Co-ordinators, policy will meet the identified accommodation needs of the Gypsy, Traveller and Travelling Showpeople communities		
Sign Off:			
Lead Officer	Approved?		Day
Jo Wilkins	Approved		8/10/13
Stage 2 Equalities Officer Approval			Date and Comments
Jo Morgan			08/10/10

Table 3: Stage 1 Screening of Proposed Main Modifications (March 2013)

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SS3: Delivering New Employment Land	No	No	No	No	Yes	As a result of the representations received during the Proposed Main Modifications consultation the proposed new text after paragraph 4.63 is proposed to be amended by the addition of further text to include the Yeovil Sustainable Urban Extensions within the permissive approach to planning applications for employment use within the Directions of Growth. The same further amendment is proposed to be made within the text of Policy SS3. A Stage 1 Equalities Impact Assessment was undertaken, and at this stage it is considered that a Stage 2 Equalities Impact Assessment is not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.

SS5: Delivering New Housing Growth	No	No	No	No	Yes	<p>As a result of the representations received during the Proposed Main Modifications consultation the proposed new text after paragraph 4.103 is proposed to be amended by the addition of further text to include the Yeovil Sustainable Urban Extensions within the permissive approach to planning applications for housing growth within the Directions of Growth. The same further amendment is proposed to be made within the text of Policy SS5. It is also proposed to add a footnote to the supporting text to clarify the position regarding Crewkerne and Wincanton. A Stage 1 Equalities Impact Assessment was undertaken, and at this stage it is considered that a Stage 2 Equalities Impact Assessment is not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.</p>
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YV2: Yeovil Sustainable Urban Extension	No	No	No	No	Yes	<p>As a result of the representations received regarding the Proposed Main Modifications two further Minor amendments are proposed to be made to Policy YV2, firstly the deletion of “and west” from the description of the location of the Sustainable Urban Extension to the South and secondly the amendment of the requirement for employment land from approximately 2.5 hectares to approximately 2.58 hectares. A Stage 1 Equalities Impact Assessment was undertaken, and at this stage it is considered that a Stage 2 Equalities Impact Assessment is not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.</p>
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<p>YV6: Delivering Sustainable Travel at the Yeovil Sustainable Urban Extension</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>Yes</p>	<p>As a result of the representations received regarding the Proposed Main Modifications further Minor amendments are proposed to be made to Policy YV6. The percentage of travel originating from the Sustainable Urban Extensions by non-car modes is reduced from 50% to 30% subject to viability and the potential to increase this to 60% has been deleted. The provision of an Electric Car Pool scheme has been deleted from the Policy and contributions to a Quality Bus Partnership are now sought. In addition a number of other minor text amendments are made. A Stage 1 Equalities Impact Assessment was undertaken, and at this stage it is considered that a Stage 2 Equalities Impact Assessment is not required. The revised Policy has no impact to equality. No negative impacts were identified and a full Equality Analysis is not required.</p>
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