

Equality Impact Assessment – Gypsy and Traveller Plan Site Options Consultation 2014

Details of the assessment	
Name of Function/Policy/ Service being assessed	Gypsy and Traveller Plan – Site Options Consultation
Date of assessment	Commenced: October 2013 Completed: Active document – Status On-going
Directorate & Service	Community and Planning Services, Planning Policy
Policy Owner	Hannah Gooden
Name of Officer(s) carrying out assessment:	Mikyla Smith

Step 1	Initial Screening for:	
	<ul style="list-style-type: none"> New/revised policies/strategies policy decisions considering partnership working arrangements procurement/commissioning activities (For assessments identified within the Equality Impact Assessment Timetable please go straight to Step 2).	
	Key Questions	Answers/Notes
1	What are you looking to achieve in this activity?	<p>To assess the Gypsy and Traveller Plan – Site Options Consultation document.</p> <p>Sevenoaks District Council (SDC) aim to produce a Development Plan Document (DPD) which will form part of the Local Plan and set out allocated sites for the provision of Gypsy and Traveller accommodation, to meet the District's need up until the end of the Plan period (2026).</p> <p>In order to produce the DPD, the Council will need to undertake various rounds of public consultation, the first of which will be on the Gypsy and Traveller Plan – Site Options Consultation.</p>
2	Who in the main will benefit?	Members of the community of the Sevenoaks District who make up the Gypsy and Traveller population, particularly those persons who wish to engage with the planning system and those who are seeking homes.
3	Does the activity have the	Yes <input type="checkbox"/> Please explain:

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	Key Questions	Answers/Notes
	potential to cause adverse impact or discriminate against different groups in the community?	No <input checked="" type="checkbox"/> Please explain: The plan allocates land for future development of Gypsy and Traveller pitches to assist the Council in meeting the identified accommodation needs of the Gypsy and Traveller community up until the end of the plan period. The Local Plan currently identifies the provision for bricks and mortar housing, allocating sites across the District to meet that need. By ensuring that the needs of this minority group are fairly and equally considered by the Local Plan (in the same way as general housing and land allocations) the Council aims to prevent any discrimination against this group, via the planning process.
		Note: if the answer is 'yes' then a full equality impact assessment is required – see step 2.
4	Does the activity have potential to make a positive contribution to equalities?	Yes <input checked="" type="checkbox"/> Please explain: The plan allocates land for future development of Gypsy and Traveller pitches to assist the Council in meeting the identified accommodation needs of the Gypsy and Traveller community up until the end of the plan period. By ensuring that the needs of this minority group are fairly and equally considered by the Local Plan (in the same way as the general housing need and other land allocations) the Council aims to prevent any discrimination against this group, via the planning process. A strategy which considers provision for adequate future homes for Gypsies and Travellers will make a positive contribution to this minority group.
		No <input type="checkbox"/> Please explain:
		Note: if the answer is 'yes' then a full equality impact assessment is required – see step 2.

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Where the screening has identified the need for a full impact assessment, this must:

- be commenced during the drafting stages of a new policy/strategy and fully completed following any consultation period before submitting for committee approval
- carried out before any policy decision is taken
- completed in the planning stages of any procurement exercise

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	Key Questions	Answers/Notes
Step 2	Scoping the assessment	
1.	What is the overall aim, or purpose of the function/ policy/service?	<p>The Council aims to ensure that everyone, including Gypsies and Travellers, have the opportunity to access a safe and affordable home. Local authorities are required by law under the Housing Act 2004 and by national policy to assess the accommodation needs of the Gypsy and Traveller population in their area, and if need is identified, to develop a strategy to meet it.</p> <p>The Gypsy and Traveller Plan – Site Options Consultation document, is the first document to be considered as part of the on-going consultation process which will lead to the production of the Gypsy and Traveller Development Plan Document (DPD). This DPD will form part of the Local Plan and set out allocated sites for the provision of Gypsy and Traveller accommodation, to meet the District’s need up until the end of the Plan period (2026).</p> <p>The DPD’s preparation will be set in the context of the Core Strategy. This strategy is central to the delivery of sustainable development and the creation of sustainable communities throughout the District. The document will work alongside the rest of the Local Plan and national policy to assist in the delivery of certain strategic objectives for the future development of the area.</p>
2.	What outcomes do you want to achieve with this function/ policy/service and for whom?	<p>Once prepared, the DPD will aim to allocate sites that have been robustly assessed and are available, suitable and deliverable throughout the plan period. The overarching aim is to increase the number of authorised Gypsy and Traveller pitches in the most appropriate locations across the District, allowing the Gypsy and Traveller community to meet their needs. The prospect of permanent pitches provides secure homes with access to services, facilities, education, healthcare, welfare and employment opportunities, which could help to reduce potential inequalities experienced by Gypsy and Traveller families or individuals. Permanent pitches may also assist to prevent any Gypsies or Travellers who are subject to continuous and ‘enforced’ nomadism (due to constant movement from private land by local authorities), as well as reducing the number of unauthorised sites.</p>

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	Key Questions	Answers/Notes
		<p>Unauthorised sites are often a significant issue which have the potential to impact not only the Gypsy and Traveller population, but local authorities, landowners and the settled population. Sites occupied without permission may be situated in inappropriate locations unsuitable for accommodation and may expose the occupier to health hazards such as poor air quality, lack of waster/sewage disposal, or land contamination issues. These locations are often unsustainable, with poor transport infrastructure, lacking in access to healthcare facilities and other services and provisions. Unauthorised encampments may also damage the local environment and amenity and it is not uncommon for these sites to be a major source of tension between Gypsies and Travellers and the settled population. This can have an overall negative effect on community cohesion principles.</p> <p>At this stage, the current Site Options Consultation document sets out the planning context for the preparation of this plan, the evidence base for Gypsy and Traveller need and the identified site options (inclusive of those deemed to be unsuitable). Consultation on this document will allow the general public to comment on the objectives, site selection process and identified site options for Gypsy and Traveller accommodation.</p>
3.	Who will be affected?	<p>Mainly members of the community of the Sevenoaks District who make up the Gypsy and Traveller population, particularly those persons who wish to engage with the planning system and those who will be seeking accommodation during the plan period. Others affected may be those from the settled population who live in close proximity to proposed site allocations, landowners, developers and private applicants.</p>
4.	Who defines or defined the function/service/ policy?	<p>This document has been prepared by the Sevenoaks District Council Planning Policy Team and will be subject to continued consultation with the general public (and statutory bodies) in accordance with the adopted Statement of Community Involvement (SCI).</p>
5.	Who implements the function/service/policy?	<p>Sevenoaks District Council will implement the service. Other partner organisations operating within the district area, individuals and private sector companies may also have a role in implementation.</p>

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	Key Questions	Answers/Notes																
6.	How do the outcomes of the function/service/policy meet or hinder other policies, values or objectives of the public authority (if applicable)?	<p>Please indicate which of the Councils core values / promises (as set out in the Vision) these outcomes relate to:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">We will provide value for money</td> <td style="width: 20%; text-align: center;">X</td> </tr> <tr> <td>We will work in partnership to keep the District of Sevenoaks safe</td> <td style="text-align: center;">X</td> </tr> <tr> <td>We will continue to collect rubbish efficiently and effectively</td> <td style="text-align: center;">n/a</td> </tr> <tr> <td>We will protect the Green Belt</td> <td style="text-align: center;">X</td> </tr> <tr> <td>We will support and develop the local economy</td> <td style="text-align: center;">n/a</td> </tr> <tr> <td>Fairness</td> <td style="text-align: center;">X</td> </tr> <tr> <td>Integrity</td> <td style="text-align: center;">X</td> </tr> <tr> <td>Quality</td> <td style="text-align: center;">X</td> </tr> </table>	We will provide value for money	X	We will work in partnership to keep the District of Sevenoaks safe	X	We will continue to collect rubbish efficiently and effectively	n/a	We will protect the Green Belt	X	We will support and develop the local economy	n/a	Fairness	X	Integrity	X	Quality	X
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Fairness	X																	
Integrity	X																	
Quality	X																	
7.	What factors could contribute or detract from the outcomes identified earlier?	Factors at play which may detract from the ability to allocate sites may include a lack of suitable, available and deliverable land for pitches, general economic instability and market fluctuations. Active participation from, and engagement with, the public (including the Gypsy and Traveller community), landowners and statutory bodies will contribute to the aims of the plan.																
Step 3	Consideration of data and information																	
8.	What do you already know about who uses this function/service/ policy?	<p>There is no one source of evidence which provides definitive information about the population of Gypsies and Travellers located in the Sevenoaks District, however The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2012) provided the following:</p> <ul style="list-style-type: none"> - The Gypsy and Travellers population in the District is estimated to be 498 people, or 0.4% of the overall population. - Household sizes of this group are significantly larger than the settled population at 3.4 persons per household. - 17% of those sampled for the study (over half of the estimated population were sampled) were households over 60 years of age. - The vast majority of those sampled have lived in the District for over 10 years, many of whom were born here or have strong family links to the area. 																

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	Key Questions	Answers/Notes
		<ul style="list-style-type: none"> - Those sampled demonstrated a mix between those who still travelled and those who no longer travelled. <p>The study has revealed that there is a need to provide between 72 and 78 pitches for the Gypsy and Traveller population across the District, up until the end of the Plan period.</p>
9.	<p>Has any consultation with service users already taken place on the function/service/ policy and if so what were the key findings?</p>	<p>The Gypsy and Traveller – Site Options Consultation is the first stage of consultation (to allow for public comment) on site options. The following engagement has taken already taken place:</p> <p>Calls for Sites:</p> <ul style="list-style-type: none"> - <i>January - March 2010 The Allocations (Options) Consultation</i> included a call for sites for gypsy and traveller accommodation. - <i>May – August 2011 The Development Management Policies Consultation</i> included a call for sites for gypsy and traveller accommodation. - <i>Call for Sites August 2012</i> involved contacting Gypsies and Travellers living in the District, Gypsy and Traveller organisations and those who registered an interest through Local Plan consultations. Parish and Town Councils were also contacted for their views on any potential sites within their areas. <p>Meetings conducted as part of plan preparation:</p> <ul style="list-style-type: none"> - SDC held a meeting with neighbouring authorities to determine other area’s provision requirements, where they are in the plan preparation process, and how they intend or anticipate meeting any identified requirements; - discussions have been held with the KCC communications and engagement team, and Gypsy and Traveller Liaison Unit; and

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	Key Questions	Answers/Notes
		<p>- in-house meetings have been held with the Development Management, Enforcement, Housing, Property, and Environmental Health teams.</p> <p>Following the 2010 and 2011 Calls for Sites, the Council formally decided to allocate sites for Gypsies and Travellers through a Gypsy and Traveller Site Provision Plan rather than in the Allocations and Development Management Plan (ADMP), which is currently at examination stage.</p> <p>As a result of responses received during the various calls for sites, discussions with the local Gypsy and Traveller population, Town and Parish Councils and other interested parties, the Council has identified the sites found within the Gypsy and Traveller – Site Options Consultation document. A meeting with neighbouring authorities did not result in any expressions of interest or willingness to support SDC in the provision of our identified need.</p>
10.	What, if any, additional information is needed to assess the impact of the function/service/policy?	<p>The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Sevenoaks (2012), produced by the Salford Housing and Urban Studies Unit (SHUSU) at the University of Salford, forms a key part of the evidence base for the preparation of the plan.</p> <p>The current Site Options Consultation Plan will need to undergo various rounds of consultation before it can be adopted by the Council as a DPD. During these rounds, relevant representations received on the document and any new national planning policies or guidance, will help to shape the Plan's development.</p>
11.	How do you propose to gather the additional information?	Via subsequent rounds of consultation and analysis of the responses gained from those consultations in accordance with the Statement of Community Involvement.
Step 4		Assessing the Impact

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	Key Questions	Answers/Notes		
12.	<p>Based on what information you already know, in relation to each of the following groups consider whether</p> <p>a) there is anything in the function/service/policy that could discriminate or put anyone at a disadvantage</p> <p>b) for an existing function/service/policy, how it is actually working in practice for each group</p> <p>N.B. As the Plan is specifically designed to set out provisions for the Gypsy and Traveller community, equalities have been assessed from the point of view of this group alone. It is not considered that the allocation of pitches across the District for Gypsy and Traveller accommodation will have a detrimental impact on any equalities groups generally, therefore this is not discussed in the section below.</p> <p>It is important to note that limited evidence is available on the demographic make up of the Gypsy and Traveller community in the District. It is likely that further evidence will come forward as part of continued consultation to be undertaken on the Gypsy and Traveller DPD. Equalities will therefore be re-assessed at each stage of the plan making process.</p>			
a.	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%;">Equality groups</td> <td style="width: 15%;">Age</td> </tr> </table>	Equality groups	Age	<p>An unstable living environment may have an effect on all age groups across the Gypsy and Traveller community, however it has the potential to have a particularly detrimental impact on young people and children. By allocating pitches in line with sustainable development principles, younger members of the community will be more likely to maintain a regular and continuing access to education.</p> <p>The evidence base suggests that a significant minority of the Gypsy and Traveller population are over 60, and that most come from larger than average family units that have strong connections to the Sevenoaks District. As people age they are significantly more likely to suffer with healthcare issues that require regular or ongoing treatment. By allocating pitches in line with sustainable development principles older members of the community may be more likely to have access to healthcare and welfare requirements that are specific to the older population.</p>
Equality groups	Age			

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	Key Questions	Answers/Notes
b.	Disability	<p>By ensuring adequate, suitable and sustainable accommodation persons with disability are more likely to have access to healthcare and transportation, as well as assistance from the family unit, should it be required.</p> <p>Road side stopping and unauthorised site occupation are likely to mean that there is a lack of suitable facilities for those who are considered to have a disability. Unauthorised sites are also unlikely to have the adequate access facilities required.</p>
c.	Carers	There is no direct evidence base on which to make an assessment.
d.	Gender	There is no direct evidence base on which to make an assessment.
e.	Race	The document has been specifically prepared to consider the needs of the Gypsy and Traveller community. As noted throughout the document, the specific needs of this minority group are being considered alongside the general settled population. Pitch provision will allow for the continued stability of this community, safeguarding their ability to have a permanent safe and secure base within the Sevenoaks District – an area which the majority of the population have strong family ties to.
f.	Religion/Belief	There is no direct evidence base on which to make an assessment.
g.	Sexual Orientation	There is no direct evidence base on which to make an assessment.
h.	Marital / Civil Partnership status	There is no direct evidence base on which to make an assessment.
i.	Pregnancy and maternity	Although there is no direct evidence to make an assessment, it is anticipated that a secure and stable environment will have a more positive impact on pregnant women, allowing for access to pre and post natal healthcare and welfare facilities that are vital during and after pregnancy.
j.	Gender reassignment	There is no direct evidence base on which to make an assessment.
k.	General <i>i.e affecting all of the above /other</i>	The evidence base has indicated that many of the Gypsies and Travellers surveyed across the District no longer travel on a regular basis. By ensuring that permanent pitch locations are suitable and sustainable, this provides the possibility of permanent and

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Key Questions		Answers/Notes
	e.g. socio-economic	continued access to work. This may help to stabilise family units and reduce wealth inequalities.
Step 5	Reviewing and scrutinising the Impact	
13.	Have you identified any differential impact and does this adversely affect any groups in the community?	No
14.	Can we make any changes?	Changes to the Plan will be made throughout its development and until it is adopted as a DPD which forms part of the Council's Local Plan.
15.	If there is nothing you can do, can the reasons be fairly justified?	NA
16.	Do any of the changes in relation to the adverse impact have a further adverse affect on any other group?	NA

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Step 5 continued...		Actions to be inserted into Equality Action Plans		
Based on your answers in Step 5, please finalise your actions here. These actions will then be incorporated into our equality action plans.				
Equality Strand	Action	Outcome/monitoring information and targets	Date for Completion	Responsible Officer
If an adverse impact was found or unmet needs identified, which actions will you put in place to address this:				
If the impact is still unclear, list the actions you will put in place to gather the information you need:				
If you did not find any evidence of unmet needs or adverse impact, list the actions you will put in place to maintain good practice:				
	To continue to consult in accordance with the SCI, on all Local Plan documents, ensuring that all residents who wish to be involved in the preparation of DPD's can express their views.	On going.	On going.	Planning Policy Team

Step 6		
Decision making and future monitoring		
	Key questions	Answers / notes
17.	Which decision making process do these changes need to go through i.e. do they need to be approved by a committee/Council?	These changes need to proceed through the following timetable: <ul style="list-style-type: none"> - Agreement by cabinet to consult on the Gypsy and Traveller Plan – Site Options (10/04/14). - Consultation (May/June 2014) - Pre-submission publication (Winter 2014) - Adoption (Winter 2015)
18.	How will you continue to monitor the impact of the function/service/ policy on diverse groups?	Through public consultation in accordance with the SCI.
19.	When will you review this equality impact assessment?	During the next round of consultation on the Gypsy and Traveller Plan

Final steps

For an existing function/service/policy:

- Submit the EqlA to your Departmental Management Team for approval.
- Send your assessment to the West Kent Equalities Officer for publication on the website.
- Update Covalent.

For a new function/service/ policy:

- Summarise your findings in the committee report.
- Ensure planned consultations address the findings of the impact assessment.

