

HDC Full Equality Impact Assessment Form

Part 1 – AIMS AND IMPLEMENTATION OF THE POLICY/SERVICE PROCEDURE/PRACTICE

1.1 What is being assessed? Name of the service, policy, procedure or practice:

(What is being assessed – service/function, policy, procedure or practice? Is it new or existing?)

Harborough Local Development Framework Core Strategy Development Plan Document (LDF CS DPD). Once adopted the Core Strategy (CS) will replace the saved policies of the Harborough District Local Plan (adopted 5 April 2001). The EIA is produced for the submission version of the document, the last stage in the preparation & public consultation process to develop the core strategy.

Further details of what is being assessed are given in Section 1 & 2 of the EIA Report at Appendix 1.

1.2 Officer(s) & Section/Service responsible for completing the assessment:

(Explain why the members of the impact assessment team were selected e.g. the knowledge and experience they bring to the process).

See Section 2 (Pages 4/5) of the EIA Report at Appendix 1.

Joanna Ellershaw (Planning Policy Officer) – Policy Team, Built Environment Services, HDC. Selected to lead on the EIA, also managing the preparation of a Sustainability Appraisal for the CS.

Stephen Pointer (Policy Manager) - Policy Team, Built Environment Services, HDC. Overall responsibility for the Policy Team comprising planning and housing policy functions.

Tina Tailor (Equalities & Diversity Officer) –Corporate Administration, HDC. Specialist HDC officer with technical expertise & knowledge appropriate to supporting the EIA task.

Jennifer Stephens (Business Planning & Transformation Officer) – Change Management, HDC. Selected to act as critical friend, with no specialist knowledge of policy planning.

Former HDC Equality Officer (Jake Atkinson) provided informal guidance on the scoping and process of conducting the EIA in Autumn 2009.

1.3 What is the main purpose or aims of the service, policy, procedure or practice?

Further detail is provided in Section 1.2 of the EIA Report at Appendix 1.

1.4 Who is affected by the service/policy/procedure/practice? Who is it intended to benefit and how?

Who are the main stakeholders in relation to this policy?

What outcomes would other stakeholders want from this policy?

Are there any groups, which might be expected to benefit from the intended outcomes, but which do not?

Everyone within the community will in theory benefit (directly or indirectly) from the CS whether they are an individual, group or business resident in, or with an interest in, the district.

Further detail is provided in Section 4 (Pages 7-19) of the EIA Report at Appendix 1.

1.5 Has the service/policy/procedure/practice been promoted or explained to those it might affect directly or indirectly?

Details on who, when & how those directly / indirectly affected by the CS have been consulted, and how that process was promoted are given in Section 4 (Page 7-19, particularly 4.1 – 4.4) of the EIA Report at Appendix 1. In the material for each stage of consultation the purpose of seeking input to the process of developing the core strategy was explained.

1.6 How does the service/policy/procedure/practice contribute to better Community Cohesion?

(How do you promote good relations between different communities you serve based on mutual understanding and respect? What opportunities are there for positive cross cultural contact between these communities to take place e.g. between younger and older people, or between people of different religious faiths?).

The statutory requirements and processes of the LDF system (a plan led policy making system) seek to involve and engage people in the process of plan making and thereby build understanding and foster good relations. Undertaking topic and place based stakeholder workshops & consultation events (Have Your Say Meetings) as part of the consultation process specifically sought to bring different groups / sections of the community together to discuss issues and options and to build a mutual understanding and respect.

Further details & dates for consultation events / activities are given in Section 4 and appendix A (Page 32) of the EIA Report at Appendix 1.

1.7 How does the service/policy/procedure/practice fit in with the council's wider aims? Include corporate and partnership priorities.

(How does the policy relate to other policies and practices within the council? What factors/forces could contribute /detract from the outcomes? How do these outcomes meet or hinder other policies, values or objectives of the council?)

Information on how the CS fits with wider community aims and strategy, particularly the Sustainable Community Strategy (SCS), is given in section 1.2 (Page 3) of the EIA Report at Appendix 1. Further detail is given in Chapter 3 of the Core Strategy. The strategic objectives of the CS are developed around the 7 priority themes of the SCS. The CS sets out the long term spatial plan for the district, which supports the delivery of other district strategy e.g. Housing Strategy for Harborough District 2008-2013.

Factors affecting outcomes;

- Effectiveness of the consultation process to find out what the needs of the community and, equalities target groups are.
- The scale and nature of changes needed to the LDF CSS as a result of consultation at the pre-submission stage which may slow the process to submission & the Council's aim to adopt the CS, and progress to preparing other DPD's
- Changing economic climate and its impact on the delivery of development by developers and stakeholders.

The outcomes of the LDF Core Strategy contribute to the achievement of HDC's Corporate Priorities for 2009/10 (People, Resources, Places) in particular Place priorities; Housing, Planning Enforcement, Economic Downturn and 2010/11 (People, Resources, Places) in particular; Housing, Infrastructure & Planning, Community engagement, cohesion & wellbeing.

1.8 What is the relevance of the aims of the service/policy/procedure/practice to the equality target groups and the Council's duty to eliminate unlawful racial, disability and gender discrimination, and promote equality of opportunity?

- Encourage greater involvement by equality target groups in planning policy
- Demonstrate good practice in consultation which promotes equality of opportunity and is responsive to the needs of equality target groups and eliminates unlawful discrimination.
- The ability monitors positive / negative impact on equality target groups.

Detail on the relevance of the LDF CS to equality target groups is given in Section 4 (Page 7-19) of the EIA Report at Appendix 1.

The Core Strategy is relevant to all who live and work in the district. The following equality target groups are considered those potentially most relevant to the CS ;

- Race – specifically Ethnic Minority Gypsy & Traveller Community
- Disability
- Age – particularly the Young & Elderly
- Religion / Belief

1.9 How is, or will the service/policy/procedure/practice be put into practice and who is, or will be, responsible for it?

(Who defines or defined the policy? Who implements the Policy? How does the council interface with other bodies in relation to the implementation of this policy? Is the service provided solely by the Department/Unit or in conjunction with another department, agency or contractor? If external parties are involved then what are the measures in place to ensure that they comply with the Councils Equal Opportunity Policy?)

Once adopted the LDF, comprising the Core Strategy and other DPDs, will become the framework or rule book for guiding and taking decisions on new development in the district. The policies of the CS will be implemented largely by the private sector, the council and other organisations via the development management function of the council (e.g. planning application decisions by Development Control).

A number of statutory and local performance indicators and targets are stated in the Core Strategy. KPI's and policy implementation, including progress against targets, will be monitored annually by the LDF Team and reported via the Annual Monitoring Report (AMR). Where necessary policies will be reviewed in light of the AMR. The Core Strategy and other LDF DPD's are long term development plans, once adopted they will be subject to periodic review in accordance with planning legislation & best practise guidance – at present there is no review schedule for the Core Strategy.

The process of preparing the Core Strategy and other DPD's, and associated consultation, is the responsibility of the Policy Team but is undertaken in collaboration with other service areas. The recommendations / actions detailed in Section 6 (Page 30) of the EIA Report at Appendix 1 will be implemented by the Policy Team for the next stage of consultation that will take place on the submission version of the Core Strategy during Oct / Nov 2010 or in 2011 when preparation work begins for the Allocations DPD and Developer Contributions.

EIA's will be produced for both the Allocations & Developer Contributions DPD's. Key Equality Monitoring Data collected between now & then, will be reviewed when EIA for these DPD's are scoped out and any intelligence relevant to the diversity profile of the district will be fed. Where necessary this will result in further changes to the consultation process / methods or provide an additional evidence to input into the development of policies.

The ongoing involvement of the Equalities Officer in the preparation of EIA for other DPD's will ensure compliance with any forthcoming HDC Corporate Equality Strategy and provide an extra checking mechanism that the recommendation / actions detailed in Section 6 (Page 30) of the EIA Report at Appendix 1 are implemented when preparing subsequent DPD's.

Part 2 – CONSIDERATION OF DATA AND RESEARCH

To conduct the assessment you will need information about service users and staff that provide the service. This section is to help you identify the sort of information that will be needed to help you assess whether there may be barriers to different equality groups who access your service, policy, procedure or practice.

2.1 List all examples of quantitative and qualitative data or any consultation information available that will enable the impact assessment to be undertaken (include information where appropriate from other directorates/units, Census 2001 etc. Please note that in some cases data may not exist or be available and you may therefore have to undertake additional research.)

Details of consultation information (& links to documents) are given in Sections 4.2 & 4.4 (Page 9 & 11) of the EIA Report at Appendix 1.

Documents that form the evidence base for the LDF CSS are listed on the Council's website via this link [Harborough District Council - Evidence Documents](#)

2.2 Equalities profile of users or beneficiaries. (Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups.)

Data used to inform the EIA is detailed in Section 3 (Pages 5-8) of the EIA Report at Appendix 1. Conclusions detailed at Section 4.6 of this report identify issues concerning the collection of key equality monitoring data.

2.3 Evidence of complaints against the service/policy/procedure/practice on grounds of discrimination. (Is there any evidence of complaints either from customers or staff (grievance) as to the delivery of the service, or its operations, on the equality target groups?)

Consultation responses to the LDF, generally provide a mix of positive & negative comments, but are not considered as or dealt with as complaints. Information on the number / type of complaints logged against the service or operation of the policy function within planning is not readily available, and so no analysis of those made on the grounds of discrimination is possible.

HDC's newly introduced scheme for co-ordinating & monitoring Customer Complaints, Comments, Compliments & Suggestions (July 2010) will ensure that this data is captured, analysed & reported monthly in future. Analysis & feedback disaggregated at Service (Built Environment Service) and Team (Policy Team) level will be sought & fed into EqlA's for other LDF DPD's at the scoping stage. In future the monitoring scheme, and use of the online standard form, will be promoted and supported by the Policy Team as the way to raise issues concerning the 'process' used for LDF consultations.

2.4 What does the consultation/research/data indicate about the negative impact of the service, policy, procedure or practice?

Section 4 (Pages 4-19) of the EIA Report at Appendix 1 – summarises the issues raised, some of which could result in negative impacts if un-addressed by the Core Strategy. Section 5 (Page 19-28) of the EIA Report at Appendix 1 shows how the policies of the Core Strategy address these issues and that no negative differential impacts were recorded.

2.5 What does the consultation/research/data indicate about the positive impact of the service, policy, procedure or practice?

Section 4 (Pages 4-19) of the EIA Report at Appendix 1 – summarises the issues raised, some of

which could result in positive impacts if addressed in the policies of the Core Strategy. Section 5 (Page 19-28) of the EIA Report at Appendix 1 shows how the policies of the Core Strategy address these issues & the impact likely to result. Some positive impacts were recorded, specifically for the following equality target groups; Race, Disability, Age

Part 3 – ASSESSMENT OF IMPACT

Now that you have looked at the purpose, etc. of the **service/policy/procedure/practice** (part 10 and looked at the data and research you have (part 2), this section asks you to assess the impact, positive and negative of the service/policy/procedure/practice on each of the six strands of diversity covered in the Council's Equality and Diversity Policy. A copy of the policy can be found on the council's website

RACE – testing of disproportional, adverse, neutral or positive impact

a. Identify the effect of this policy on different RACE groups from information available. Section 5 (Page 19-28) of the EIA Report at Appendix 1 identifies the effect of all policies within the LDF CSS on race.	
b. How is the target race group reflected in the take up of the service. Key equality monitoring data collection to be implemented, as an outcome of the EIA, for submission consultation Oct / Nov 2010.	
c. From the evidence available does the policy affect, or have the potential to affect, racial groups differently? Yes <input type="checkbox"/> No <input type="checkbox"/>	
d. If yes, do any of the differences amount to: Commentary provided in Section 5 (Page 19-28) of the EIA Report at Appendix 1	
	Reason/evidence/comment
Barriers, negative impact or unlawful discrimination?	No
Neutral impact?	Yes
Positive impact?	Yes
e. If there is a negative impact, can it be justified on the grounds of promoting equality of opportunity for one racial group or for another legitimate reason?	

GENDER – testing of disproportionate, adverse, neutral or positive impact

a. Identify the effect of this policy on different GENDER groups from information available.

Section 5 (Page 19-28) of the EIA Report at Appendix 1 identifies the effect of all policies within the LDF CSS on gender.

b. How are men and women reflected in the take up of the service.

Key equality monitoring data collection to be implemented, as an outcome of the EIA, for submission consultation Oct / Nov 2010.

c. From the evidence available does the policy affect, or have the potential to affect, men and women differently?

Yes ☐

No ☐

d. If yes, do any of the differences amount to:

Not applicable

	Reason/evidence/comment
Barriers, negative impact or unlawful discrimination?	
Neutral impact?	
Positive impact?	
e. If there is a negative impact, can it be justified on the grounds of promoting equality of opportunity for one gender or for another legitimate reason?	

DISABILITY – testing of disproportionate, adverse, neutral or positive impact

<p>a. Identify the effect of this policy on Disabled people from information available.</p> <p>Section 5 (Page 19-28) of the EIA Report at Appendix 1 identifies the effect of all policies within the LDF CSS on disability.</p>	
<p>b. How are disabled people reflected in the take up of the service?</p> <p>Key equality monitoring data collection to be implemented, as an outcome of the EIA, for submission consultation Oct / Nov 2010.</p>	
<p>c. From the evidence available does the policy affect, or have the potential to affect, disabled people differently?</p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p>	
<p>d. If yes, do any of the differences amount to:</p> <p>Commentary provided in Section 5 (Page 19-28) of the EIA Report at Appendix 1</p>	
	Reason/evidence/comment
Barriers, negative impact or unlawful discrimination?	No
Neutral impact?	Yes
Positive impact?	Yes
<p>e. If there is a negative impact, can it be justified on the grounds of promoting equality of opportunity for disabled people or for another legitimate reason?</p>	

AGE – testing of disproportionate, adverse, neutral or positive impact

a. Identify the effect of this policy on different AGE groups from information available.

Section 5 (Page 19-28) of the EIA Report at Appendix 1 identifies the effect of all policies within the LDF CSS on age.

b. How are different age groups reflected in the take up of the service.

Key equality monitoring data collection to be implemented, as an outcome of the EIA, for submission consultation Oct / Nov 2010.

c. From the evidence available does the policy affect, or have the potential to affect, age groups differently?

Yes ☐

No ☐

d. If yes, do any of the differences amount to:

Commentary provided in Section 5 (Page 19-28) of the EIA Report at Appendix 1

	Reason/evidence/comment
Barriers, negative impact or unlawful discrimination?	No
Neutral impact?	Yes
Positive impact?	Yes

e. If there is a negative impact, can it be justified on the grounds of promoting equality of opportunity for one age group or for another legitimate reason?

LESBIAN, GAY, BISEXUAL and TRANSGENDER – testing of disproportional, adverse, neutral or positive impact

a. Identify the effect of this policy on LESBIAN, GAY, BISEXUAL and TRANSGENDER people from information available.

Section 5 (Page 19-28) of the EIA Report at Appendix 1 identifies the effect of all policies within the LDF CSS on Sexual Orientation and Transgender.

b. How is this target group reflected in the take up of the service.

Key equality monitoring data collection to be implemented, as an outcome of the EIA, for submission consultation Oct / Nov 2010.

c. From the evidence available does the policy affect, or have the potential to affect, LESBIAN, GAY, BISEXUAL and TRANSGENDER people differently?

Yes ☐

No ☐

d. If yes, do any of the differences amount to:

Not applicable

	Reason/evidence/comment
Barriers, negative impact or unlawful discrimination?	
Neutral impact?	
Positive impact?	

e. If there is a negative impact, can it be justified on the grounds of promoting equality of opportunity for LESBIAN, GAY, BISEXUAL and TRANSGENDER people or for another legitimate reason?

RELIGION/BELIEF – testing of disproportionate, adverse, neutral or positive impact

a. Identify the effect of this policy on different RELIGIOUS/BELIEF groups from information available.

Section 5 (Page 19-28) of the EIA Report at Appendix 1 identifies the effect of all policies within the LDF CSS on Religion / Belief.

b. How are the target RELIGIOUS/BELIEF groups reflected in the take up of the service.

Key equality monitoring data collection to be implemented, as an outcome of the EIA, for submission consultation Oct / Nov 2010.

c. From the evidence available does the policy affect, or have the potential to affect, RELIGIOUS/BELIEF groups differently?

Yes ☐

No ☐

d. If yes, do any of the differences amount to:

Commentary provided in Section 5 (Page 19-28) of the EIA Report at Appendix 1

	Reason/evidence/comment
Barriers, negative impact or unlawful discrimination?	No
Neutral impact?	Yes
Positive impact?	Yes

e. If there is a negative impact, can it be justified on the grounds of promoting equality of opportunity for one RELIGIOUS/BELIEF group or for another legitimate reason?

OTHER – Additional groups that may experience impacts - testing of disproportional, adverse, neutral or positive impact

<p>a. Identify the effect of this policy on OTHER GROUPS in the DISTRICT from information available. <i>(These other groups could include factors such as literacy, health, poverty, marital status etc.)</i></p> <p>None specific, LDF CSS has a wide impact for all members of the community.</p>	
<p>b. How are the target OTHER groups reflected in the take up of the service.</p> <p>Not applicable</p>	
<p>c. From the evidence available does the policy affect, or have the potential to affect, OTHER groups differently?</p> <p>Yes <input type="checkbox"/></p> <p><u>No</u> <input type="checkbox"/></p>	
<p>d. If yes, do any of the differences amount to:</p> <p>Not applicable</p>	
	Reason/evidence/comment
Barriers, negative impact or unlawful discrimination?	
Neutral impact?	
Positive impact?	
<p>e. If there is a negative impact, can it be justified on the grounds of promoting equality of opportunity for one OTHER group or for another legitimate reason?</p>	

Part 4

MEASURES TO MITIGATE DISPROPORTIONATE OR ADVERSE IMPACT OR IMPROVE ON NEUTRAL OR POSITIVE IMPACTS

4.1 If there is any negative impact on any target equality group identified in Section 3, is the impact intended or legal?

Detail given in Section 6 (Page 30) of the EIA Report at Appendix 1 – no negative impact identified.

4.2 Specify measures that can be taken to remove or minimise the disproportionate or adverse effect identified in Section 3. If none were identified in Section 3, identify how disproportionate impact or adverse effect could be avoided in future. (Consider measures to mitigate any adverse impact and better achieve the promotion of equal opportunity).

Specific measures to improve the consultation process for the LDF CSS are detailed Sections 4.6 and 6 (Pages 18 & 30) of the EIA Report at Appendix 1.

4.3 If there is no evidence that the service/policy/procedure/practice promotes equality, equal opportunities or improves relations within equality target groups, what amendments could be made to achieve this?

Specific measures to improve the consultation process for the LDF CSS are detailed Sections 4.6 and 6 (Pages 18 & 30) of the EIA Report at Appendix 1.

4.4 If A NEUTRAL OR POSITIVE IMPACT has been identified, can that impact be improved upon (continuous improvement)? What are the improvements that can be made? Can they be applied elsewhere in the Council?

Specific measures to improve the consultation process for the LDF CSS are detailed Sections 4.6 and 6 (Pages 18 & 30) of the EIA Report at Appendix 1.

The implementation of actions listed in Section 6 (Page 30), specifically the collection & use of Key Equality Monitoring Data will ensure that in future the profile of consultees can be compared to the profile of district residents. This will result in a better understand of how representative consultees are of the wider district population and highlight any gaps / or failures to successfully engage that may be addressed by changes to the consultation process / methods.

4.5 How will any amended service, policy, procedure or practice be implemented, including any necessary training. (Include actions, date for completion, officer(s) responsible and any budget requirements.)

Details are given in Section 6.1 (Page 30) of the EIA Report at Appendix 1.

Part 5 - CONCLUSIONS AND RECOMENDATIONS

5.1 Does the policy comply with equalities legislation, including the duty to promote race, disability and gender equality? *(Take into account your findings from the impact assessment and consultations and explain how the policy was decided upon its intended effects and its benefits.)*

YES

☒

NO

☐

5.2 What are the main areas requiring further attention?

Details are given in Section 6.1 (Page 30) of the EIA Report at Appendix 1.

5.3 Summary of recommendations for improvement.

Details are given in Section 6.1 (Page 30) of the EIA Report at Appendix 1.

5.4 What equality monitoring/evaluation/review systems have been set up to carry out regular checks on the effects of the service/policy/procedure/practice? *(Give details.)*

The Core Strategy EqIA will be published alongside the next stage of consultation on the submission version of the Core Strategy and provided to the Equalities Officer for publication on the HDC website. The commitment to producing an EqIA's for the Allocations & Developer Contributions DPD's is recorded in the Policy Team Plan for 2010/11. The Council's TENS monitoring system picks up any EqIA intensions from Team Plans and formulates a target against which progress is recorded and assigns a lead person to report on progress.

HDC has developed, and is in the process of adopting, a standard Equality Monitoring Form for capturing data. Data will be held centrally and analysed corporately – information will be available to service teams throughout the authority to assist with EqIA's.

5.5 When will the amended service/policy/procedure/practice be reviewed? *(Include dates for completion and officer(s) responsible.)*

The amended 'process' for consultation will be reviewed in 2011 after the end of the consultation period for the submission LDF CSS (Oct / Nov 2010) and / or before any consultation is undertaken on subsequent DPD for the LDF.

Policy outcomes, thorough the monitoring of Key Performance Indicators (KPI's) & progress against Core Strategy targets, will be reported annually in the LDF Annual Monitoring Report (AMR). The 'policies' of the Core Strategy will be reviewed during the lifetime of the plan, though a scheduled has not been agreed.

Date completed: 14 September 2010

Signed by (Manager): S. Pointer - Planning Policy Manager

Part 6 - Equality Impact Assessment Improvement Plan

The table below should be completed using the information from the Equality Impact Assessment to produce an action plan for the implementation of proposals to:

1. Lower the negative impact? **And/Or**
2. Ensure that the negative impact is legal under anti-discriminatory law? **And/Or**
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups? i.e. increase the positive impact

Please ensure that you update your service/business plan with the equality objectives/targets and actions identified below.

Area of negative impact	Changes proposed	Lead Officer	Timescale	Resource implication	Comments
N/a					

Part 7 - Equality Impact Assessment: Summary Report

The results of equality impact assessments must be published. Please complete this summary, which will be used to publish the results of your impact assessment on the authority's web site and return it to your authority's nominated "equality" officer.

Date of Assessment: September 2010	
Completing Officer's Title/Position: Policy Officer – LDF Team	
Officer's Name: J Ellershaw	
Service, Policy, Procedure, or Practice that was Impact Assessed: Local Development Framework – Core Spatial Strategy (LDF - CSS)	
Summary of findings: Refer to Section 4.6 and 5 (Pages 18 & 19) of EIA Report at Appendix 1.	
Summary of Recommendations and Key Points of Action Plan: Refer to Section 6 (Page 30) of the EIA Report at Appendix 1	
Groups that this policy will impact upon: ALL or: and	
Race	Yes
Gender	
Sexual Orientation	
Age	Yes
Disability	Yes
Religion or Belief	Yes
Other	

Harborough Local Development Framework Core Strategy

Equality Impact Assessment Report

September 2010

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Table 2 Summary of Equality Related Issues & Comments Raised during Core Strategy Consultation (incl. Stakeholder & Public Consultations)

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Appendices:

- A Consultation Events & Activities for the Core Strategy
- B List of Equality & Diversity Groups Consulted

1. Introduction

The following report sets out the outcome of an Equality Impact Assessment (EqIA) of the Harborough Local Development Framework Core Strategy (LDF CS). It has been prepared to accompany the pre- submission Core Strategy, and associated Sustainability Appraisal Report, and is being made available alongside these documents for comment as part of the final submission stage of public consultation.

1.1 What is and EqIA?

The purpose of an EqIA is to assess the likely differential impact of a strategy, policy, function or service on specific equality & diversity groups and to assess how the needs of these particular groups have been considered.

Local authorities have a duty of care to eliminate unlawful discrimination and to promote equality of opportunity for specified equality groups. Under current legislation the Council is required to undertake EqIA's before a new strategy or policies are implemented. EqIA's must address the 7 equality characteristics set out in legislation; Race, Disability, Age, Gender, Religion or Belief, Sexual Orientation, Transgender.

1.2 What is the Core Strategy?

The Core Strategy (CS) is the main document of the Local Development Framework (LDF). It contains the overarching spatial policies focusing in broad strategic terms on what development will take place in Harborough district to 2026, where it will take place and how it will be delivered. The submission CSS is the final stage in the preparation and public consultation process to develop the strategy.

The Core Strategy is a key delivery vehicle for the district and Leicestershire's Sustainable Community Strategy which is focused around seven priority themes. Together these documents aim to enhance wider social, economic, and environmental well being in Harborough. Thirteen spatial objectives for the Core Strategy have been developed from these themes;

1	To meet strategic housing requirements, the accommodation needs of the District's population and the need for affordable housing.
2	To meet employment requirements, foster economic growth and maintain high employment levels in the District.
3	To locate new development in sustainable locations that respect environmental capacity and which have appropriate infrastructure, services and facilities in place or where these can realistically be provided; and to encourage the appropriate re-use of brownfield sites in sustainable locations.
4	To protect, enhance and, where appropriate, secure the provision of additional accessible community services, facilities, open spaces and infrastructure throughout the District.
5	To protect and enhance the District's distinctive rural landscape, settlement pattern, historic assets, natural environment and biodiversity.
6	To safeguard and enhance the character and built heritage of the District's settlements and ensure residential amenity is protected
7	To protect and promote the economic viability and vitality of the District's town & rural centres
8	To promote good design which respects, and where possible enhances, its surroundings and quality of life and which improves community safety, reduces anti-social behaviour and reduces the fear and incidence of crime.
9	To reduce the environmental impacts of road traffic, both private and commercial, and lessen the need for car use by encouraging alternative modes of transport including cycling and walking

10	To minimise waste production and maximise re-use and recycling of waste
11	To minimise energy demand and maximise the use of renewable energy resources
12	To promote sustainable growth of tourism and access to the countryside within the district
13	Locate new development in areas which will not put life or property at risk of flooding

The policies of the core strategy show how these objectives will be delivered and achieved.

The core strategy is being prepared by the council in partnership and consultation with the community. Everyone within the community is expected to benefit however, there are particular customers of the planning function or service who are likely to be more affected than others. These groups include those who apply for planning permission (developers, individuals and businesses), statutory bodies, parish councils, local interest groups, voluntary groups and other service providers.

2. Equality Impact Assessment Process for LDF

Local Government Improvement and Development produce guidance on how to conduct an EqlA, which sets out a six stage process;

- Stage 1 – Initial screening
- Stage 2 – Scoping & defining
- Stage 3 - Information gathering
- Stage 4 – Making a judgement
- Stage 5 – Action planning
- Stage 6 – Publication and review

This EqlA has broadly followed the latter stages of the process as set out by IDeA and has drawn on the experience of other local authorities. The same process, subject to any changes to respond to lessons learnt as a result of this EIA, will be applied to the preparation of EqlA's for subsequent Development Plan Document (DPD's) that form part of the LDF e.g. Allocations DPD and Developer Contributions DPD and any future review of the Core Strategy.

Stage 1: The initial screening process that took place was informal. Based on previous experience with the authorities Housing Strategy and earlier work associated with the preparation of the Statement of Community Involvement for the LDF, it was determined that a full EqlA would be required.

Stage 2: This EIA covers an assessment of both the 'Process' of preparing the core strategy and an assessment of the 'Policies' of the pre-submission Core Strategy, in effect the preferred policies only. EqlA's will be prepared for other Development Plan Documents, which together with the core strategy will make up the Harborough LDF, and subsequent & periodic reviews of each of the policy documents. The EqlA process will be refined and improved each time.

It is acknowledged that other local authorities have taken a different approach to conducting an EqlA of their core strategies, including producing an EqlA specifically for each policy option considered at each stage of their core strategy preparation process. However, this EqlA report has been put together with limited resources which have influenced its scope and depth. Whilst this presents a risk (assessed as Acceptable Level 3 – Negligible Impact / Low Likelihood, in accordance with HDC Risk Strategy 2009), proceeding with the EqlA as outlined in this report has enabled the open consideration of equality issues and has successfully highlighted areas for improvement when undertaking EqlA's for subsequent LDF documents.

The EIA has been led by members of the Planning Policy Team who are tasked with preparing the LDF. In accordance with good practise guidance those with specialist knowledge and expertise have been involved in the preparation of the EqIA, namely;

- Equalities & Diversity Officer
- Business Planning & Transformation Officer

3. Diversity Profile of Harborough District (Stage 3)

A number of different national and local sources of information have been used as background to the EqIA and this report. The table below provides a summary and some baseline data for the district; it covers the seven equality & diversity characteristics focussed on by this assessment.

Table 1: Diversity Profile & Information

Equality Group	Harborough District – Summary Information
Race	<p>Harborough district has limited diversity in terms of ethnic origin compared to the county & region. Census 2001 data indicates that 98% of district residents are 'white' (compared to 91% nationally) 96% of who are of 'British' origin.</p> <p>The second largest ethnic group 'Asian or Asian British' accounts for 1% of residents, followed by 'Mixed' at 0.8%, 'Black/ Black British' at 0.2% and 'Chinese & Other Ethnic Groups' at 0.17%</p> <p>In 2005 (Harborough Community Profile) the BME population of Harborough stood at 3,257 or 4.2% (Leics 7.3%), with the largest ethnic groups Other White, Indian and Irish. At ward level Thurnby & Houghton have the highest BME population in the district (9.4%) the BME group in this ward is Indian.</p> <p>The Leicester & Leicestershire Gypsy & Traveller Accommodation Needs Assessment (2007) identifies future needs and states that there are at least 60 Gypsy and Traveller families in the district, and at least 62 Travelling Show people families.</p> <p>The Gypsy & Traveller community is reported to consist of English Gypsies and Irish Travellers. The survey showed that average household size = 3.71 persons; 47% Romany/Gypsy, 20% Traveller, 7% English Traveller, 27% Irish Traveller. The greatest concentration of families is at the Greenacres site in NW of Market Harborough, and Bitteswell. Figures, exclude families at Justin Park a large private authorised site south of Market Harborough within neighbouring Daventry District. Plots for Travelling Show people are clustered at Lutterworth.</p>
Disability	<p>13.7% of district residents had a 'Long-standing illness, disability or infirmity' recorded in Census 2001. Of all economically active persons in the district some 2.6% are recorded as economically inactive due to being 'Permanent Sick / Disabled, compared to 5.3% nationally.</p>
Age	<p>The population of the district recorded in Census 2001 76,559, more recent ONS mid-2008 estimates indicate that the population now stands at 82,800. In total the population comprises 59.7% of working age, 19.6% under 16, and 20.7% of pensionable age (male over 65, female over 60).</p> <p>In terms of age structure the population of Harborough varies from national trends in a number of ways. Most notable is the relatively low proportion of people within the 16-29 age band. This trend is</p>

	<p>particularly pronounced in rural villages, as a large proportion of young people are concentrated in the two towns.</p> <p>The number of people of working age claiming one or more DWP benefit in November 2009 was 3,930 – 460 more than the previous year. 37% of those have been claiming for over 5 years. This is 2% less than the Great Britain average. 1.8% of working age people (880) in Harborough were claiming Jobseekers Allowance. (LSR Online: Leicestershire Unemployment Bulletin May 2010)</p> <p>In contrast, compared to nationally, there is a higher proportion of people aged 45-64 living in the district. Some 23% of all households in the district are 'All Pensioner Households' on a par with the county figure.</p> <p>In total there are 1,523 people aged over 60 in Harborough living in income deprived households, with the greatest concentrations in the central wards of the two towns. Similarly some 1,147 children live in income deprived households in Harborough again concentrated in the central wards of Market Harborough & Lutterworth.</p> <p>The teenage pregnancy rate is far lower than the national average and measures of children's health including tooth decay and obesity suggest that children within the District are generally healthy. The District has a life expectancy of 79.5 for males and 82.6 for females. These are both higher than the national average of 77.7 and 81.1 respectively. (Harborough Health Profile, 2009)</p> <p>The Leicester & Leicestershire Strategic Housing Market Assessment (SHMA) considers affordable housing issues, including those faced by the young & elderly. The need for affordable housing in the district is high; especially for families with children and the elderly.</p> <p>Harborough has one priority neighbourhood area which falls into the 10% most deprived in the County, situated in the centre of Market Harborough around the Welland Park and Coventry Road areas (Harborough Priority Neighbourhood Profile 2008).</p>
Gender	<p>The mid-2008 population estimates record that 49.7% of the districts population are male and 50.2% female, this is broadly in line with national averages.</p> <p>A significantly higher proportion of men are economically active at 89.6%, compared to women at 70.7%.</p>
Region & belief	<p>Census 2001 data indicates that around 83% of the districts population are Christian, 0.5% Hindu, 0.3% Sikh, 0.25% Muslim, 0.15% Buddhist, 0.14% Jewish. Some 15% of people stated that they have no religion.</p>
Sexual Orientation	<p>There is limited information relating to sexual orientation. In the 2001 Census it was recorded that 90 people in the district were living as part of a same sex couple.</p>
Transgender	<p>There is no information relating to transgender.</p>

Key issues highlighted in the table are reflected in Chapter 2 of the Core Strategy: Spatial Portrait of Harborough, and followed through in the Spatial Objectives detailed in section 3.7.

4. Assessment of Core Strategy Consultation Process (Stage 4)

The planning system requires that all section of the community are involved in the various stages of the planning process, particularly plan making. The LDF Statement of Community Involvement (SCI) is the statutory document (adopted 10/7/06) that sets out the District Council's policy for community involvement and consultation in the preparation of Local Development Plan Documents and in making development control decisions on planning applications. The SCI sets out;

- Our vision and strategy for community involvement
- What we will consult on
- How we will engage the community
- Who will be engaged in the process
- The main stages of involvement

In preparing the Core Strategy the council has undertaken a series of consultation activities to involve key stakeholders and the community in developing policies for the district.

- Sustainability Appraisal Scoping Report - 2005
- Issues & Options Consultation (Informal) – 2005
- Preferred Options & Sustainability Appraisal Consultation – 2006
- Stakeholder Consultation - 2009
- Alternative Options Consultation (Formal) – 8th June to 20 July 2009

A final stage of consultation, which will make the pre-submission version of the CS document available for comment, will be undertaken during October / November 2010. In accordance with guidance this is a statutory period of consultation, prior to the document being submitted to the Government and before the 'soundness' of the document is tested by a Government appointed inspector.

The core strategy considers development throughout the whole of Harborough and will impact on everyone that lives and works in the district. In implementing the SCI the council considers it important that local people and organisations have the opportunity to influence, directly, decisions about the future of their area, and where appropriate help put those decisions into practice. The range of people and stakeholders involved in the preparation of the core strategy is therefore diverse, and reflects the rural nature of the district. They include;

- Statutory bodies (& special interest groups) including; adjacent local authorities, regional and national agencies
- Voluntary bodies working within Harborough
- Bodies representing racial, ethnic or national groups within Harborough
- Bodies representing religious groups within Harborough
- Bodies representing disabled persons within Harborough
- Bodies representing business interests within Harborough
- Residents
- Landowners, property & development interests and transport bodies
- Bodies representing the wider community; including the Local Strategic Partnership, Parish Councils and area forums

The Council is particularly committed to engaging certain sectors of the local community in the core strategy, that it has had previous difficulty involving in the planning process namely;

- Farmers
- Gypsy & Traveller Community
- Young People
- Retired People

The SCI states the council's intention to engage with these communities through connections with the bodies, forums and groups representing them. The EqlA demonstrates how these groups have been involved. It has not been possible to measure the effect that different engagement techniques and communications channels, used within the consultation process, have had on the number of people from equality & diversity groups engaging with the consultation process, due to a failure to collect any basic EqlA monitoring information from event participants and respondents to the consultation. This shortcoming will be rectified, by the collection of HDC Corporate EqlA data, during the final statutory consultation process for the submission version of the LDF CS and subsequent LDF DPD's.

The influence that comments & views expressed by or on behalf of members of specific equality & diversity groups have had on the policies of the core strategy are set out in section 5 of this report.

4.1 Engagement & Involvement

The SCI made a commitment to using different ways of communicating and different types of events to involve the community in the core strategy and make the process as inclusive as possible. This section gives an indication of methods used and measures taken during consultation, particularly in relation to identified Equalities Groups (Race, Gender, Disability, Religion & Belief, Age, Sexual Orientation and Transgender) and the 4 groups whom it has historically been hard to engage.

4.2 Dissemination of Information

Written information has been prepared and made available at the 'Issues & Options' stage, the 'Alternative Options' stage and the pre-submission stage. This has included; information pack, an Alternative Options leaflet (paper), Consultation Response forms (summary & topic based), dedicated edition of the Council Talkback newsletter. All documentation has been made available in both hard copy and electronic forms, with the latter encouraged. Every effort was made to use plain English to encourage as many people as possible to take part in the consultation. A commitment to provide information in other formats e.g. large print, audio, Braille, other languages, on request, was explicit in all published information.

At Alternative Options stage individual topic leaflets were prepared to help engage those interested in a particular aspect of planning policy, reflecting the wide range of groups covered by the consultation.

At all stages multiple ways of enabling people / groups to express and submit responses was used, including; written, online (dedicated e-mail), and verbally. This was undertaken to make engaging with and responding to the consultation responsive to the potential needs of members of equality & diversity groups and as accessible to all as possible.

Consultation Events – a wide range of formal & informal activities and events have been used to engage with the community and particular parties, some reflecting the equality & diversity groups assessed in this report. During the early stages of the core strategy process specific stakeholder workshops / focus groups and in-depth interviews were held with members and representatives of;

- Gypsy & Traveller community,
- Farmers
- Disabled

The expertise and assistance of specialist / representative organisations was used to ensure these activities were sensitive to the needs of these particular groups e.g.; event location, timing, venue, use of familiar facilitators. The Council's Citizen's Panel, Housing Partnership group and Youth Council were also consulted to back up other public consultation activities.

At the alternative options stage a series of geographically focussed 'Have Your Say Meetings' were held at locations across the district, to enable as many members of the community as possible to access an event & give their views. Venues already familiar to people (and with disabled access) such as; libraries, council service shops, village / community centres were used in addition to having a static and touring exhibition. A full programme of the events held

is in Appendix A. All events were publicised – people unable to attend events were encouraged use the Councils website and to contact the LDF Team for further information.

To aid participation key information was presented visually and verbally at all consultation events and often facilitated group discussions were used to enable specific issues / questions, pertinent to particular locations or groups to be addressed. The specialist skills of BMG Research, Dialogue and members of the Planning Policy Team were used to facilitate, note take and staff the variety of events at different stages of the process to give people more information about the planning context, to capture comments and offer practical help and support to participants when needed.

4.3 Awareness Raising & Advertising

All stages, events and information concerning the core strategy have been promoted and advertised using a variety of methods to raise awareness amongst as many people as possible. These have included; press launch / articles, radio coverage, Council website, articles & notices of events in local / parish newsletters, posters in libraries & council buildings and making published information available to view in council offices. All published information was promoted 'as hard copies available on request' for those without access to the internet or access to deposit copies. A dedicated e-mail and telephone number were used during consultation periods.

In addition written invitations were sent to Parish Council's and all organisations / individuals on the LDF Database to advise and encourage them to take part in consultations. A list of those organisations on the database representing the interests of equalities groups is given at Appendix B. Elected council members, in particular members of the LDF Task Panel were involved in events / activities within their local areas and used throughout as ambassadors for the LDF to help raise awareness and feedback comments from the public who may not engage with the core strategy by written or formal means.

4.4 Feedback on Consultation

The importance of giving feedback to those engaged with the LDF process has been acknowledged throughout and at key stages information has been published to identify, summarise and explain the feedback received. This has included;

- Core Strategy Workshops Report (2009 Dialogue)
- Core Spatial Strategy Towards a Final Draft (Oct 2009)

Full details of the consultation activities undertaken to date are contained in the Consultation Report (see http://www.harborough.gov.uk/downloads/Consultation_Report.pdf). All consultation responses made at the formal Alternative Options consultation stage are also recorded (see http://www.harborough.gov.uk/downloads/LDF_Comments_Reportv2.pdf).

4.5 Comments Made During the Core Strategy Consultation Process

The following tables summarise issues and comments which relate to equality & diversity or were made by equality & diversity groups, during the main stages of consultation for the Core Strategy. It includes comments recorded at events (by facilitators, officers & members) held throughout the preparation of the Core Strategy and those made by individuals, groups and organisations to the Alternative Options Consultation 8/6/09 – 20/7/09 received via response forms, letter and email. An indication of how these issues have influenced the development of policies and / or are reflected within the policies of core strategy is given.

Table 2 – Summary of Equality Related Issues & Comments Raised during Core Strategy Consultation (incl. Stakeholder & Public Consultations)

Issue Identified through Consultation	Equality Groups	How these Comments have Influenced Core Strategy Policy
Lack of affordable housing – total amount & proportion in different development / villages. Provision to meet the needs of the elderly.	Age (Young / Elderly) Disabled	Consultation directly resulted in a series of alternative options (percentages / thresholds & tenure) for delivering affordable housing, being proposed in the

Issue Identified through Consultation	Equality Groups	How these Comments have Influenced Core Strategy Policy
		<p>Alternative Options Consultation.</p> <p>The provision of affordable housing is considered in CS Policy 1 (Spatial Strategy) and Policy 3 (Delivering Housing Choice and Affordability). General market conditions are beyond the control of the planning system. However, all residential developments will be required to contribute towards meeting affordable housing needs. Different affordable housing targets are set for different sub-market areas. Policy 3 seeks to ensure a mix of housing types / size and makes specific provision for meeting the needs of the elderly & disabled.</p>
<p>Affordable / low cost housing is very important for rural communities & settlements with a growing young population, especially to enable young people to be able to stay in their communities</p>	<p>Age (Young)</p>	<p>CS Policy 2 (Delivering New Housing) allows for the distribution of a minimum of 376 residential dwellings to Rural Centres within the district.</p> <p>The provision of affordable housing is considered in CS Policy 3 (Delivering Housing Choice and Affordability). As a measure of the importance of affordable housing issue within the district. All residential developments will be required to contribute towards meeting affordable housing needs.</p>

Medical facilities are particularly important in the development of rural centres	Age (Young / Elderly) Disability	<p>Consultation resulted in the consideration of the hierarchy of settlements in the district and led to a number of alternative options including identifying 'Rural Centres'. Analysis of accessibility to services informed the development of the policy.</p> <p>CSS Policy 1 (Spatial Strategy) identifies 6 Rural Centres as a focus for community uses to serve their catchment areas.</p>
Public transport provision from rural areas to; established centres, medical and leisure facilities, is important. Lack of integrated transport options.	Age Disabled	<p>The analysis of accessibility by public transport informed the presentation of a number of alternative options for the distribution of development and the evolution of the CS Policy 1 (Spatial Strategy).</p> <p>CS Policy 1 (Spatial Strategy) identifies Market Harborough as the main focus for additional development in the district, including medical & leisure facilities, in recognition that it is the sub-regional centre, and most accessible / best served by public transport. CSS Policy 5 (Providing Sustainable Transport) - will maximise the use & efficiency of existing transport facilities. Whilst Policy 17 (Countryside, Rural Centres & Rural Villages) seeks to consolidate the role or Rural centres in serving their rural catchments.</p>
Housing type has an impact on the social structure of villages – more affordable / social housing needed. A sensible balance and mix of housing is needed	Age (Young / Elderly)	<p>CS Policy 3 (Delivering Housing Choice and Affordability). General market conditions are beyond the control of the planning system. However, all residential developments will be required to contribute towards meeting affordable housing needs. Affordable housing to be provided on-site in most cases with provision for when this is not achievable. Different affordable housing targets are set for different sub-market areas. Policy 3 seeks to ensure a mix of housing types / size. CSS Policy 16 enables small housing development within the confines of existing settlements.</p>
Young people / agricultural workers / other key workers are being priced out of the local housing market	Age	As above.
Public services / facilities should keep pace with growing population & development. Lack of sport & recreational facilities.	Age (Young / Elderly) Disabled	<p>The issue directly influenced the proposal of 2 alternative options for delivering 'Community Infrastructure'</p> <p>CS Policy 12 Delivering Development & Supporting Infrastructure presents a schedule of infrastructure needs</p>

		associated with the scale of development proposed for the district. It covers a wide range of public services & facilities and is organised by place.
Loss of services and facilities in rural areas	Age Disability	<p>The issue directly led to the presentation of 3 alternative options (Theme 4 – Settlement Hierarchy & Community CSP 7 – options 4, 5 & 6) for placing rural settlements in the settlement hierarchy.</p> <p>CS Policy 1 (Spatial Strategy) identifies 6 Rural Centres as a focus for services & facilities to serve their rural catchment areas.</p> <p>Consideration is also given in CS Policies 6, 7, 15, 17 to development to support & prevent the loss of existing services in rural areas.</p>
Lack of leisure facilities for young people. The needs of young children and older young people (teens) differ & certain facilities only appeal to certain groups of young people	Age (Young)	<p>The issue contributed to the formation of Theme 3 – Community Infrastructure within the Alternative Options considered for the CS.</p> <p>CS Policy 6 (Improving Town Centres & Retailing) addresses the protection and enhancement of leisure & entertainment as main town centre uses.</p> <p>CS Policy 8 (Protecting & Enhancing our Green Infrastructure) considers its contribution to recreation and includes a specific policy for Open Space, Sport & Recreation Assets.</p> <p>The need for new infrastructure provision to accompany development is detailed in CS Policy 12 and includes consideration of Children & Young People Services, Open Space & Recreation Facilities.</p>
Evening & Sunday public transport services are particularly poor	Age Disability Religion	<p>Public transport services & scheduling are the responsibility of Leicestershire County Council and are outside the remit of planning policy.</p> <p>CS Policy 5 (Providing Sustainable Transport) seeks to focus future development in areas well served by local facilities and provide for improvements.</p>
Lack of play provision for young children and teens	Age (Young)	<p>CS Policy 8 (Protecting & Enhancing our Green Infrastructure) considers its contribution to recreation and includes specific provision within the policy for Open Space, Sport & Recreation Assets.</p> <p>The need for new infrastructure provision to accompany development is detailed in CS Policy 12 and includes consideration of Children & Young People Services, Open Space & Recreation Facilities.</p>
Youth & elderly facilities are too dependant on volunteers	Age (Young / Elderly)	Voluntary run facilities are generally outside the remit of the Core Strategy & Council.

		The need for new infrastructure provision to accompany development is detailed in CS Policy 12 and includes consideration of Community Facilities, the delivery of which will be supported by the core strategy. The utilisation of community facilities & how services within them are provided is outside the remit of the CS.
Access to broadband / online services is important for rural communities and those less mobile	Disabled	CS Policy 17 (Countryside, Rural Centres & Rural Villages) gives support to development proposals that reduce the need to travel from rural areas incl. permanent / mobile shopping provision, dev which helps realise digital connectivity at speeds / reliability comparable with elsewhere in the district.
A lack of public transport, suitable for wheelchair users causes access problems	Disabled	Public transport services & the equipment they use are the responsibility of Leicestershire County Council / Private bus operators and are generally outside the remit of planning policy. CS Policy 5 (Providing Sustainable Transport) makes a commitment to the provision of safe pedestrian & cycling facilities including facilities for people who need mobility assistance, access to public transport information and waiting facilities.
Churches are an important aspect of communities and a central point for community activities	Religion	The role of churches is not specifically considered by the core strategy. CS Policy 11 (Promoting our Built Heritage & Design) makes provision to protect heritage assets, including potentially churches. Churches / church halls are additional to the assessment of provision & Community Facility need that underpins CS Policy 12, due to their denominational nature.

Gypsy & Traveller community aren't treated fairly & aren't represented. The Council should communicate directly with the local Gypsy & Traveller community in identifying needs.	Race	Dedicated stakeholder workshop / one to one meetings held to specifically engage this community. Community representatives invited to respond at each stage of consultation for CS. Consultation input resulted in 5 alternative policy options being proposed for consultation at Alternative Options stage.
Gypsy & Traveller community have similar needs (to settled communities) regarding location & proximity / access to; services, facilities, schools, work patterns, leisure.	Race	Views of G&T community directly resulted in 5 alternative options being consulted on. Further representation resulted in a combination of alternative options being formed into a specific policy CS Policy 4 (Providing for Gypsy & Traveller Needs) provides for the consideration of proximity / access to identified local facilities.
Provision for the G&T community needs to reflect their requirements e.g. separate transit & permanent pitches, size of sites / pitches, inclusion of amenity areas / hard-standing on sites, screening.	Race	CS Policy 4 (Providing for Gypsy & Traveller Needs) makes provision in accordance with G&T Accommodation Assessments and in line with good practice guideline.
Encourage younger people to take part in consultation	Age	Formal & informal consultation via the Citizens Panel and Harborough Youth Forum formed part of the plethora of activities at the Alternative Options stage of developing the CSS. Staffed exhibitions at selected community events e.g. Market Harborough Carnival, HIT Cycling Event sought to raise awareness of the CS amongst families & younger people.
Consideration should be given to the provision of older persons housing in rural settlements, linked in some cases to existing residential care provision	Age (Elderly)	CS Policy 3 (Delivering Housing Choice & Affordability) has no lower threshold for making a contribution to the provision of affordable housing & a presumption in favour of on-site provision. It also seeks to ensure a mix of housing types / size and makes specific provision for meeting the needs of the elderly & disabled. CS Policy 2 (Delivering New Housing) allows for the distribution of a minimum of 376 residential dwellings to Rural Centres within the district.
Whether or not to provide for land for affordable & market housing for the G&T community should be considered by the CS.	Race	Evidence underpinning CS Policy 4 (Providing for Gypsy & Traveller Needs) considered both affordable & market need for this community. The policy applies to both forms of provision and is criteria based. A commitment is made to deliver additional sites through the development control process and Allocations DPD.
The distribution of pitches for the	Race	CS Policy 4 (Providing for Gypsy &

Gypsy & Traveller community should reflect their needs.		Traveller Needs) proposes a criteria based approach to determine the location of future provision within, adjacent to or in close proximity to certain settlements in accordance with the CS settlement hierarchy.
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Sources: (BMG Report 2005, Dialogue Report 2009, Responses to Alternative Options Consultation 2009)

4.6 Conclusions on Consultation Process

A total of 1026 organisations / individuals have participated in the range of consultation activities for the Core Strategy – 56 via Focus Group & Workshops, 104 via Stakeholder Workshops, 392 by responding directly to the Alternative Options Consultation, 250 via attending events for the Alternative Options, and 224 via the Citizens Panel. It is acknowledged that this figure is unlikely to represent unique responses, as there is scope for double counting and no cross referencing between those participating in events and making written responses. Additional individuals participated by subscribing to petitions raised in response to the CS.

Collectively the total level of responses compares favourable with the number of comments received for consultations held for previous planning policy documents. Of the 40 equality & diversity organisations listed at Appendix 2, 8 participated in Stakeholder events, and 4 submitted written responses to the Alternative Options stage of consultation for the Core Strategy. In general the attendance at focus groups & stakeholder workshops for specific groups within the community, including some equality & diversity groups was patchy, though reasonable efforts were made to accommodate specific needs. In contrast attendance at all the dedicated 'Have your Say' consultation events was excellent & exceeded expectations. The number of visitors attending static exhibitions, during staffed session, was generally felt to be low although the number of attendees was not recorded. Issues raised via these sessions were informally recorded & reported by staff and fed into the analysis of comments.

No equalities monitoring data was collected during the consultation process so it is difficult to say whether respondents reflect the diversity of the district's population.

The EIA has highlighted a number of shortcomings in the consultation process, which need to be addressed;

- A failure to record Equality & Diversity Monitoring data, for which a corporate system has been introduced this financial year.
- The inability to easily isolate & analysis the comments of organisation & individuals representing or making comments about or on behalf of equality & diversity groups. This failure to 'tag' such respondents means that some specific issues or points raised could have been overlooked or not fully taken into account.
- Lack of coverage of groups / individuals representing the following equality & diversity groups; Sexual Orientation, Transgender, Gender
- Inviting groups representing equality & diversity groups, to participate in consultation does not mean that they have been effectively engaged. Specific support & follow up approaches to such groups, may improve response rates / degree of engagement.

Each of these points is picked up in section 6 of this report.

5. Equality Impact Assessment of Core Strategy Policies (Stage 4)

The part of the report provides an overview of each individual policy of the Core Strategy. Set out in the form of a matrix (similar to our approach the Sustainability Appraisal that also accompanies the CS) it assesses whether each policy has the potential to have an impact on any of the identified equality groups.

Symbol	Likely Impact
+	Likely positive effect
0	Neutral / no effect
-	Likely negative effect
+/-	Uncertain effect

Table 3 – Assessment of Core Strategy Policies

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion / Belief	Sexual Orientation	Trans-gender	
Policy 1 – Spatial Strategy. This policy sets out the essential overarching strategy covering settlements and the distribution of future development across the district.	0	+	+	0	0	0	0	<p>The provision of new housing, employment, retail, leisure and community facilities and the protection & enhancement of green infrastructure assets should have a positive impact on the whole district and its residents.</p> <p>Focusing the majority of future development on Market Harborough and whilst enabling existing settlements, that have a range of services & facilities and are well connected and accessible, to develop will particularly help those who live in rural areas, have restricted mobility or rely on public transport.</p>
Policy 2 – Delivering New Housing. The policy set out the strategy for meeting the housing needs of the district's population. The scale of housing growth for different settlements across the district is detailed. It outlines broad principles for where & what type of land will be given priority, for what type / mix of development and how this will be managed.	0	+	+	0	0	0	0	<p>The policy seeks to ensure that there is a broad range of housing types in a range of sustainable locations to meet the needs residents. The principle means of accommodating housing growth is in a Strategic development Area (SDA) at Market Harborough – which is linked & will be integral to the town whilst providing new services, facilities and infrastructure.</p> <p>By allowing for mix of housing & limited housing growth in Rural</p>

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion / Belief	Sexual Orientation	Trans-gender	
								Centres and identified sustainable rural villages, it seeks to have a positive benefit on people who wish to remain in rural areas, particularly the young and elderly.
Policy 3 – Delivering Housing Choice & Affordability Sets out how new homes will meet the requirement of all members of the community. It seeks to provide a real choice for everyone by increasing the supply of affordable homes through all new housing development.	0	+	+	0	0	+/-	+/-	By implementing percentage thresholds for the provision of affordable housing units in sub-market areas across the district the policy seeks to increase the supply of affordable homes across the district. The policy seeks to provide a mix of housing tenures, and to integrate affordable & market housing to create mixed & sustainable communities. The young and old tend to have a higher need for affordable housing. Provision suitable for the needs of older persons and persons with disabilities is required by the policy.
Policy 4 – Providing for Gypsy, Traveller and Travelling Showpeople Needs. The policy seeks to meet the housing needs of Gypsies, Travellers and Travelling Showpeople. It sets out the considerations for determining locations for new sites and extensions to existing sites.	+	0	0	0	0	0	0	The policy will help to provide living accommodation for this community. Requiring sites to be within, adjoining or in close proximity to existing settlement and within reasonable distance of local services: schools, shops, GP should help to reduce the exclusion often felt by this ethnic group. Making provision for sites, to meet

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion / Belief	Sexual Orientation	Trans-gender	
								identified need, and allowing existing sites to extend will help to reduce the impact of unauthorised sites.
Policy 5 – Providing Sustainable Transport. The aim of the policy is to continue to direct most development into areas which already have capacity to offer transport choices for local journeys and to make best use of existing infrastructure.	0	+	+	0	0	0	0	The policy seeks to locate development in areas well served by local services to reduce the need to travel, where access to public transport & alternatives means of travel (foot / cycle) are convenient. Improvements to transport infrastructure (car / alternative modes) will be sought via development enabling & mitigating measures co-ordinated for wider strategic benefit. It should result in a positive impact for those groups who rely more on public transport such as the young, elderly and disabled.
Policy 6 – Improving Town Centres & Retailing. The policy seeks to maintain & enhance Market Harborough Lutterworth town centres and Broughton Astley as a district centre. New shopping, leisure and entertainment uses will be focused in the S&BA of these centres. Retail & service provision in local & neighbourhood centres will be protected.	0	+	+	0	0	0	0	Market Harborough & Lutterworth are the most accessible locations in the district, serving the retail & town centre needs of the wider rural area. Focusing development in these town centres should mean facilities are concentrated and accessible to a greater proportion of residents, particularly the young, elderly and those with mobility issues or limited transport opportunities. Improving retail and service provision in Broughton Astley & protecting local

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion / Belief	Sexual Orientation	Trans-gender	
								/ neighbourhood centres should help reduce the need to travel between locations for everyday shopping needs.
Policy 7 – Enabling Employment & Business Development The aim of the policy is meet employment needs, foster business growth and maintain high levels of employment in the district.	0	+	+	0	0	0	0	The protection of employment provision in Market Harborough, Key and Rural Centres will be of benefit to the wider community and help reduce the need for journeys between home & work. Limited new provision in Market Harborough, at a location that is accessible by a range of transport modes, will help those who rely more on public transport (young, elderly those on low incomes) to access employment.
Policy 8 – Protecting & Enhancing Our Green Infrastructure. The policy seeks to secure a high quality, accessible and multi-functional green infrastructure network across both the rural and urban areas of the district, which contributes to healthy lifestyles and a rich & diverse natural environment.	0	0	+	0	0	0	0	The green infrastructure network is a multi-functional asset which is important in enhancing quality of life for all people who live, work and visit the district. In particular it allows recreation space and play space particularly for children, young people and the elderly and contributes to healthy lifestyles. New development will not compromise, but contribute to new provision and to enhancing links between green assets. Bio-diversity & geo-diversity assets will be protected,

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion / Belief	Sexual Orientation	Trans-gender	
								managed and enhanced.
Policy 9 – Addressing Climate Change. The policy seeks to reduced energy demand and maximise the use of renewable energy resources.	0	+	+	0	0	0	0	New development is directed towards the most sustainable locations, and development is required to mitigate and adapt to climate change. Best practise is encouraged in design, construction and the use of renewable & low carbon energy sources. Better energy efficiency in buildings & their construction and the use f renewable energy sources should help to reduce the running costs of homes and non-residential buildings. This is likely to have greatest positive impact on those groups suffering fuel poverty, often the elderly & those on low incomes.
Policy 10 – Addressing Flood Risk The aim of the policy is to restrict new development to areas of lowest flood risk, and manage & mitigate against any increase in the level of flooding experienced in the district.	0	0	0	0	0	0	0	New development will be directed towards areas of lowest flood risk within the district. The policy should result in wide benefit for those who live, work and visit the district. It is unlikely to have any significant impact on any specific section of the community.
Policy 11 – Promoting Our Built Heritage & Design The policy aims secure the highest standards of design for new development, which respects the	0	0	0	0	0	0	0	The policy should result in wide benefit for those who live, work and visit the district. It is unlikely to have any significant impact on any specific section of the community.

Policy	Equality Groups							Explanatory Notes
	Race	Disability	Age	Gender	Religion / Belief	Sexual Orientation	Trans-gender	
context in which it takes place, to create attractive places. Heritage assets will be protected, conserved and enhanced incl. buildings, parks & gardens, conservation areas, scheduled monuments, nationally important archaeological remains and landscapes. Improved access to buildings & place of heritage for people & visitors will be encouraged.								
Policy 12 – Delivering Development & Supporting Infrastructure The policy seeks to ensure that the impact of all forms of development are mitigated or that necessary infrastructure to accompany development is provided, through Developer Contributions.	0	0	0	0	0	0	0	All people who live, work and visit the district will benefit from the infrastructure that is secured to support new forms of development. It is unlikely to have any significant impact on any specific section of the community.
Policy 13 – 17 Policies for Places (Market Harborough, Leicester Urban Fringe, Lutterworth, Broughton Astley, Countryside / Rural Centres & Rural Villages) These policies explain what the district-wide spatial strategy & delivery policies mean for individual places within the district.								The impact of these policies on the district and the people who live, work and visit the district is as for Policies 1-12.

6. Summary & Conclusions of Equality Impact Assessment (Stage 5)

The EqIA has examined whether the Core Strategy policies and the consultation process used to develop it has had any adverse or beneficial impacts on or discriminated against any of the seven equality & diversity groups.

6.1 Core Strategy Consultation Process

The EqIA has shown that the Council has taken reasonable measures, to be as inclusive as possible and engage equality & diversity groups, when consulting the public during the preparation of the Core Strategy. Consultation comments have directly influenced the content of policies as detailed in Table 3 (section 5 of this report). However more could be done to seek, monitor and track the impact of comments made by equality & diversity groups in future EIA's for other LDF DPD's. The following action points are necessary to address the shortcoming identified by this EqIA;

- i. Review LDF Database and, in liaison with the Equality & Diversity Officer, identify & add contacts representing the following equality groups; Gender, Sexual Orientation, Transgender.
- ii. Incorporate the collection of equality & diversity monitoring data, into LDF consultation process through the use of the HDC corporate Equality Monitoring Form. Submit data into central database.
- iii. Tag organisations that represent or have an interest in Equality & Diversity issues, within the UNIFORM system to enable their comments to be easily collated and analysed. Tag individuals, who complete the optional Equality Monitoring Form, within the UNIFORM system to enable their comments to be easily collated and analysed,
- iv. Review our approach to community engagement in the planning making process, and where necessary update the LDF SCI, to ensure coverage of EIA requirements and adherence to best practise guidance.

Points i – iii above will be implemented prior to the statutory consultation period for the pre-submission Core Strategy scheduled to take place in October / November 2010. It is acknowledged that implementing point ii (the collection of Equality Monitoring data) will not necessarily, or immediately, lead to the increased participation of people from the seven equalities groups in plan making. However over time it will enable us to assess how representative respondents are compared to the wider population and diversity profile of the district, and if necessary inform further changes to the means & methods of engagement used. In time this will allow for continuous improvement and result in better processes and improved inclusiveness.

6.2 Core Spatial Strategy Policies

The assessment has shown that the policies of the Core Strategy will generally benefit all people who live, work and visit the district. The strategic nature of the core strategy has a bearing on this overall outcome. Many policies are identified as having a neutral impact, whilst certain policies will have a positive impact for particular equality & diversity groups specifically; race, age, disability. No measures are felt to be required to mitigate the impact that any of the policies may have. However monitoring the implementation of the policies regularly, through the preparation of the Annual Monitoring Report (AMR) a statutory LDF document, will be necessary to measure whether and how well they deliver on their aims and whether changes are required.

During the course of preparing the EqIA it was recognised that more reference could be made to equality & diversity issues in the introductory and explanatory text for policies. Minor editorial changes have been made to ensure that equality & diversity matters are better acknowledged and integrated within the core strategy.

Equality and diversity is not traditionally a mainstream part of the planning specialism. The policy team recognise the need to continually improve knowledge & understanding in this area. The team will continue to liaise with the Equality & Diversity officer, participate in training activities in support of the equalities agenda, and undertake EqlA's to effect a gradual cultural change and embed equalities within the plan making.

Consultation Events & Activities for the Core Strategy

Date	Time	Event / Activity	Venue
8 th & 25 th Sept 2005	2 hrs each	2 Focus Groups – Public sector & Planning professionals	Market Harbourough (Angel Hotel / Council Offices)
3 rd Sept 2005	1 day	Residents Workshop	Council Offices, Market Harbourough
28 th Sept 2005	45 mins each	In-depth Interviews – Gypsy & Traveller Community	Traveller sites, Market Harbourough
23 rd Sept 2005	1 hr	Focus Group - farmers	NFU Offices
7 th Sept 2005	1 hr	In depth Interview – Disabled resident & Carer	Respondents Home
6 th Oct 2005	2hrs	Workshop – HDC Elected members	Council Office, Market Harbourough
20 th Jan 2009	11am – 1.30pm	Infrastructure Stakeholder Workshop	HDC Offices
20 th Jan 2009	2.30-5pm	Gypsy / Travellers – Stakeholder Workshop	HDC Offices
22 nd Jan 2009	11am – 1.30pm	Affordable Housing – Stakeholder Workshop	HDC Offices
22 nd Jan 2009	2.30-5pm	Environment & Green Infrastructure Stakeholder Workshop	HDC Offices
29 th Jan 2009	6-8.30pm	Rural West Stakeholder Workshop	Belgrave Hall, North Kilworth
4 th Feb 2009	6-8.30pm	Rural East Stakeholder Workshop	Medbourne Old School Village Hall, Medbourne
10 th Feb 2009	6-8.30pm	Rural East Stakeholder Workshop	Coplow centre, Billesdon
25 th Feb 2009	6-8.30pm	Broughton Astley – Stakeholder Workshop	Thomas Estly Community College
28 th Feb 2009	10.30 -1pm	Lutterworth Stakeholder Workshop	Lutterworth Town Hall, Lutterworth
28 th Feb 2009	2.30 – 5pm	Market Harbourough Stakeholder Workshop	HDC Offices
9 th June 2009	7 – 9 pm	Harbourough Have Your Say Meeting	Council Chamber, Market Harbourough
11 th June 2009	5 – 7 pm	Staffed Exhibition	Lutterworth Library
12 th June 2009	9.30am – 12pm	Staffed Exhibition	Bushby Service Shop
13 th June 2009	1 – 5 pm	Staffed Exhibition	Market Harbourough Carnival
16 th June 2009	7 – 9 pm	Lutterworth Have Your Say Meeting	Swiftway Centre, Lutterworth
17 th June 2009	7.30 – 9.30 pm	Broughton Astley Have Your Say Meeting	Village Hall, Broughton Astley
20 th June 2009	10am – 12.30	Staffed Exhibition	Great Glen Library
20 th June 2009		Distribution of consultation material	HIT Cycling event, Market Harbourough
22 nd June 2009	5 – 7 pm	Staffed Exhibition	Fleckney Library

Date	Time	Event / Activity	Venue
23 rd June 2009	7 – 9 pm	Rural Have Your Say Meeting	Council Chamber, Market Harborough
25 th June 2009	5 – 7 pm	Staffed Exhibition	Broughton Astley Library
26 th June 2009	9.30am – 12.30pm	Staffed Exhibition	Market Harborough Library
29 th June 2009		Housing Partnership Workshop	Council Chamber, Market Harborough
1 st July 2009	2 – 5pm	Staffed Exhibition	Kibworth Library
2 nd July 2009	5 – 7 pm	Staffed Exhibition	Bushby Service Shop
8 th July 2009	7 – 9 pm	Staffed Exhibition	The Coplow Centre, Billesdon
13 th July	eve	Harborough Youth Council	Council Offices, Market Harborough
15 th July 2009	7 – 9 pm	Market Harborough Have Your Say Meeting	Council Chamber, Market Harborough
5-27 July 2009		Citizen Panel Survey	n/a
8 June – 20 July 2009		Alternative Options 6 wk Consultation Period	n/a

List of Equality & Diversity Groups Consulted

Race	Leicestershire County Council – M Baggley (G&T Liaison Officer)
	Commission for Racial Equality – Leicester & Leics Office
	Commission for Racial Equality – Birmingham Office
	The Gypsy Council (UK & Euro Office)
	Travellers Education Service
	Travellers Law Reform Project c/o London G&T Unit
	Derbyshire Gypsy Liaison Group
	Showman's Guild of GB
Disability	Disability Rights Commission c/o Harborough Access Group
	Harborough Access Group
	Disabled Persons Transport Advice Committee
	Voluntary Action South Leics (VASL)
	Lutt & BA Volunteer Centre
Age	Enable Youth c/o VASL
	LCC Social Services
	Voluntary Action South Leics (VASL)
	Harborough Youth Council
	Age Concern Leicester
	Age Concern Lutterworth & District
	Help the Aged (Leicester)
	Lutt & BA Volunteer Centre
Religion / Belief	Diocesan Board of Finance
	Board of Social Responsibility
	Harborough U3A
	Churches Together
Sexual Orientation	To be added at submission CSS consultation
Transgender	To be added at submission CSS consultation
Gender	To be added at submission CSS consultation
Other	7 Locks Housing
	Derwent Living
	NCHA
	Riverside Housing Assoc
	Waterloo Housing Group
	Leicester Housing Assoc
	East Midlands Housing Assoc
	Jobcentre Plus
	Equal Opportunities Commission
	Citizens Advice Bureau
	HM Prison Service
	L & Leics PCT
	Harborough Community Safety Partnership
	Rural Community Council
	LCC Rural Officer

