

## Equality Impact Assessment / Equality Analysis

<b>Title of service or policy</b>	Gypsy, Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD) – Issues and Options consultation paper
<b>Name of directorate and service</b>	Planning Policy
<b>Name and role of officers completing the EIA</b>	Meghan Rossiter, Senior Planning Officer
<b>Date of assessment</b>	September 2011

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EqIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council’s and NHS Bath and North East Somerset’s websites.

<b>1. Identify the aims of the policy or service and how it is implemented.</b>		
	<b>Key questions</b>	<b>Answers / Notes</b>
<b>1.1</b>	<p>Briefly describe purpose of the service/policy including</p> <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	<p>The document seeks to ultimately allocate land for the development of Gypsy and Traveller sites. There are several stages to the process before final adoption of the document. As set out in the consultation document, these will be Issues and Options, an Options consultation, a Pre-Submission consultation, then the formal process of submission to the Secretary of State for consideration by a Planning Inspector at an Examination in Public.</p> <p>This Equalities Impact Assessment is on the Issues and Options stage, at which the site selection criteria and methodology are considered and a Call for Sites exercise is carried out. The Issues and Options consultation paper does not allocate land. The actions raised through this Assessment will inform each stage of the document. Each successive document will then be reassessed, with an updated Equalities Impact Assessment being produced.</p> <p>Once the Development Plan Document (DPD) is adopted it will be implemented by Development Management, the private sector, public service providers and individual households. The current Issues and Options stage is the first stage towards the final adopted version and as such will not itself be directly implemented.</p> <p>The intended outcome of the DPD is to allocate land which can then be the subject of planning applications for development as authorised Gypsy and Traveller sites.</p>

		The outcomes of this include reducing inequalities, increasing access to health and educational services, improving social interaction between communities, positive mental health, prevention of overcrowding in accommodation and improving access to employment.
<b>1.2</b>	Provide brief details of the scope of the policy or service being reviewed, for example: <ul style="list-style-type: none"> <li>• Is it a new service/policy or review of an existing one?</li> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul>	<p>The DPD is a new document that extends the development management policy CP11 of the Draft Core Strategy which sets out the criteria against which development proposals for Gypsy and Traveller sites will be assessed, to allocate specific sites for development. The allocation of sites is a national requirement set out in the Housing Act (2004), Circular 01/2006 and the draft Planning for Traveller Sites Planning Policy Statement.</p> <p>As stated in 1.1 there are several more consultation stages planned prior to the DPD being adopted. As also stated in 1.1 this gives significant scope for review which will inform each stage of the document.</p>
<b>1.3</b>	Do the aims of this policy link to or conflict with any other policies of the Council?	The DPD follows on from Core Policy 11 in the Council's Draft Core Strategy which directly references this document. It is also linked to B&NES Corporate Equality Commitment by having regard to its stated commitment for equality.

## 2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them

- Recommendations of **external inspections** or audit reports

The sources of evidence used to inform the Development Plan Document (DPD) includes the West of England Gypsy and Traveller Accommodation Assessment (2007) and the biannual Caravan Count (CLG, 2011). This information is publicly accessible. Significant local consultation was conducted in the production of the Accommodation Assessment and provides the basis for the Council's understanding of accommodation, health, educational and employment needs.

A Health Needs Assessment is due to be researched and produced by the Bath and North East Somerset Primary Care Trust which will also be used to inform future drafts of the Site Allocations DPD.

Further background information from other sources, including voluntary organisations, has been used to inform this DPD.

	<b>Key questions</b>	<b>Data, research and information that you can refer to</b>
<b>2.1</b>	What is the equalities profile of the team delivering the service/policy?	The Planning Policy team comprises people of different ethnicities, sex, age and religion. No member of the team is a member of the travelling communities.
<b>2.2</b>	What equalities training have staff received?	The full Planning Policy team received corporate equalities training and EqlA training in 2008. The team have made themselves aware of the changes in equalities law since that time. The Senior Planning Officer dealing with the development of the DPD has had specific travelling communities training in 2011.
<b>2.3</b>	What is the equalities profile of service users?	We have information about the user profile from the 2007 Gypsy and Traveller Accommodation Assessment (GTAA). Any information gathered through the consultation process of the DPD will inform future policy. The Planning Policy Team are consulting on the need to update the background information through the Issues and Options paper consultation which will also inform future policy.
<b>2.4</b>	What other data do you have in terms of service users or staff? (E.g. results of customer satisfaction surveys, consultation findings). Are there any gaps?	We have some limited equalities data from Equality Mapping and the 'Population of Bath and North East Somerset' for data on those that live in the District. Further information at progressive stages of consultation will inform future drafts of the DPD and this Equalities Impact Assessment.
<b>2.5</b>	What engagement or consultation has been undertaken as part of this EIA	<a href="#">Input into this EqlA has been received from a Corporate Equalities and Diversity Officer. This input has resulted in changes being made to improve the quality of</a>

	and with whom? What were the results?	information and to ensure full consideration of potential impacts.
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	<p>Our Statement of Community Involvement which explains how the local community can get involved in the preparation of the LDF sets out our target groups. These are Gypsies and Travellers, young people, faith, ethnic and language groups, disabled people, people living in rural areas, small business owners and residents. We will carry out extensive consultation with these groups particularly Gypsies and Travellers and we will continue to seek opportunities for future engagement with equalities groups.</p> <p>Our focus at this stage of the consultation will be engaging with Gypsies and Travellers as the most impacted on and hard to reach group. Additional help and guidance will need to be given to equalities groups. We will seek responses in verbal and written form to ensure literacy is not a barrier to becoming engaged.</p> <p>The impact on the local settled community has also been taken into account in ensuring sufficient scope for public engagement and in the detail of the DPD. For example noise and visual impact issues take into account neighbouring communities to future proposed sites.</p> <p>Legislation has introduced ‘maternity and pregnancy’ and ‘marriage and civil partnership’ as equalities groups; a future action is to consider how to involve representatives of these communities.</p>
<b>3. Assessment of impact: ‘Equality analysis’</b>		
	Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy: <ul style="list-style-type: none"> <li>• Meets any particular needs of equalities groups or helps promote equality in some way.</li> <li>• Could have a negative or adverse impact for any of the equalities groups</li> </ul>	
	<b>Examples of what the service has done to promote</b>	<b>Examples of actual or potential negative or</b>

		<b>equality</b>	<b>adverse impact and what steps have been or could be taken to address this</b>
<b>3.1</b>	<b>Gender</b> – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?)	<p>The DPD aims for accommodation developments to meet the needs of the travelling communities; the mix (different pitch sizes and tenures) should align with the needs of the communities. This will have a positive impact on both genders, allowing for changing household sizes and needs such as through divorce, remarriage and the accommodation of children.</p> <p>The aim of the document to provide permanent and transit sites will enable certainty of accommodation to travelling households. The use of a recognised postal address will positively impact on access to employment, education and health facilities in particular. Access to health facilities for pregnant women and maternity care will positively impact on the travelling communities who often have great difficulty in accessing health facilities.</p>	<p>There is the potential for adverse impacts if the DPD is not adopted through non delivery of the many positive impacts identified in this assessment.</p> <p>The continued absence of authorised permanent and transit Gypsy and Traveller pitches in B&amp;NES will fail to plan for the needs of all genders in accessing stable accommodation, employment and health and educational facilities. Poor access to health facilities in particular is likely to result from the failure to provide sites and may negatively impact on antenatal care and other health issues.</p>
<b>3.2</b>	<b>Transgender</b> – identify the impact/potential impact of the policy on transgender people	Access to stable accommodation, health and education facilities, and employment will enable equality of opportunity, including for transgender members of the travelling communities.	Non delivery of this DPD is likely to continue negatively impacting on the travelling community, including transgender people, through non delivery of land allocations for accommodation.
<b>3.3</b>	<b>Disability</b> - identify the impact/potential impact of the policy on disabled people (ensure	The site selection methodology and scoring matrix set out in the DPD use a sequential test approach that acknowledges the issues of access to local services and facilities. This will have a positive impact on directing development to the most sustainable locations which will impact positively for those disabled people who are unable to drive and that rely on public or community transport.	Non delivery of this DPD is likely to continue negatively impacting on members of the travelling community with disabilities who may otherwise not be able to access facilities, in particular health services.

	consideration of a range of impairments including both physical and mental impairments)	<p>Enabling ease of access to a range of facilities, including health, will also benefit those with special needs.</p> <p>The DPD should enable the creation of fully accessible sites which will promote equality of access.</p>	
		<b>Examples of what the service has done to promote equality</b>	<b>Examples of potential negative or adverse impact and what steps have been or could be taken to address this</b>
<b>3.4</b>	<b>Age</b> – identify the impact/potential impact of the policy on different age groups	<p>The DPD will direct development to the most sustainable locations. Locating development in close proximity to local services and facilities will have a positive impact in particular on the young in accessing education, and on the elderly in ensuring access to public transport and local services, including health facilities. More stable access to health and social care facilities for the elderly will improve community care assessment which is a particular area of concern.</p>	<p>As bullying of school age Gypsy and Traveller children is a common experience this can result in reluctance to attend school. Lack of access to stable education may exacerbate this problem and lead to problems with school-based and lifelong learning and training for employment. Consultation with the B&amp;NES Education and Learning team will seek to address these impacts.</p>
<b>3.5</b>	<b>Race</b> – identify the impact/potential impact on different black and minority ethnic groups	<p>The development of the DPD seeks to promote better race relations between the travelling community and the settled community. Engagement with the travelling community seeks to improve trust and a partnership approach to ensure policy is not 'imposed' but formed through open and co-operative working.</p> <p>Each of the issues raised in the consultation document seek to engage the travelling community in indicating their preference(s) for site provision. This will have a positive impact on meeting individual needs.</p> <p>The intention to provide permanent and transit sites promotes cultural equality as the provision of transit sites</p>	<p>There is a possible risk of no suitable sites coming forward for allocation as Gypsy and Traveller sites. The consequences of this would be continued uncertainty and poor living conditions for the travelling community, the need for enforcement against unauthorised sites by local planning authorities and police, and increased tension between the travelling and settled communities. This would disproportionately negatively impact on Gypsies and Travellers.</p> <p>There is a concern that the travelling communities are not able to participate</p>

		<p>will enable the travelling way of life without recourse to illegal encampments or developments. The use of a recognised postal address at authorised sites will positively impact on access to employment, education and health facilities in particular.</p> <p>The site selection methodology and scoring matrix utilise a sequential test approach. This will have a positive impact on directing development to the most sustainable locations which will impact positively on health and well-being.</p> <p>To promote equality the document also seeks to foster good race relations between the travelling and settled communities.</p>	<p>effectively. Failure to sufficiently engage with the local travelling community may lead to disenfranchisement with the plan making process. A method of ensuring engagement may be to ask Gypsy and Traveller community representatives to hold or co-host consultation events themselves.</p> <p>It is anticipated however that these risks will be limited given the active approach to be taken in engaging with the travelling community and across the B&amp;NES area to reach those with land interests.</p>
		<b>Examples of what the service has done to promote equality</b>	<b>Examples of potential negative or adverse impact and what steps have been or could be taken to address this</b>
<b>3.6</b>	<b>Sexual orientation</b> - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people	Access to stable accommodation, health and education facilities, and employment will enable equality of opportunity of people of all sexual orientations.	Non delivery of this DPD is likely to continue negatively impacting on the travelling community, including people of all sexual orientations, through non delivery of land allocations for accommodation.
<b>3.7</b>	<b>Religion/belief</b> – identify the impact/potential impact of the policy on	Allocating sites for authorised residential use enables stability of access to local services and facilities, including places of religious worship. This has a positive impact on religion / belief through opportunities to extend community networks and aid community integration..	The uncertainty of unauthorised sites can reduce households' access to places of faith, as well as reducing mental health and ability to carry out normal cultural practices.

	people of different religious/faith groups and also upon those with no religion.		Provision of transit sites will also enable the travelling way of life which is a key aim of the DPD.
<b>3.8</b>	<b>Socio-economically disadvantaged</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	<p>The allocation of land for the provision of permanent and transit pitches through this DPD will positively impact on the travelling community who are often socio-economically disadvantaged as arising from poor access to stable accommodation.</p> <p>By directing development to the most sustainable locations the DPD will impact positively on health, well-being and equality of opportunity in access to employment and education, improving socio-economic opportunity.</p>	There is a possible risk of no suitable sites coming forward for allocation as Gypsy and Traveller sites. The consequences of this would be continued uncertainty and poor living conditions for the travelling community, the need for enforcement against unauthorised sites by local planning authorities and police, and increased tension between the travelling and settled communities. This would negatively impact on Gypsies and Travellers by reinforcing existing socio-economic disadvantages.
		<b>Examples of what the service has done to promote equality</b>	<b>Examples of potential negative or adverse impact and what steps have been or could be taken to address this</b>
<b>3.9</b>	<b>Rural communities</b> – identify the impact /	The likely location of sites at or adjacent to rural settlements and the proposed use of a rural exception site policy will positively impact on rural communities by directing development to the most sustainable locations.	Non delivery of the DPD may result in sites coming forward outside the development plan process at less sustainable locations than desired. This would negatively impact on both

	<p>potential impact on people living in rural communities</p>	<p>Where locations are identified close to rural services and facilities this will support the viability of those services.</p> <p>The public consultation process will seek to demystify issues surrounding Gypsy and Traveller site provision and improve race relations. This will likely positively impact on settled rural communities by improving understanding of the need for accommodation in rural locations.</p>	<p>the travelling and settled communities in rural areas. The DPD will support the intentions of the B&amp;NES Draft Core Strategy policy CP11 which seeks to direct development to the most sustainable locations.</p>
--	---	--	---

## 4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
The equalities profile of service users information is not comprehensive and is now 4 years old.	Further evidence should be gathered through the consultation process.	Additional data.	Meghan Rossiter	January 2012
Planning Policy team equalities training.	Ongoing advice to officers to be provided and kept up to date.	Team briefing in advance of public consultation.	Team Leader	January 2012
Need to liaise with relevant agencies for education, health and social care.	Consultation with the B&NES Education and Learning, Health and Social Care teams.	Consultation conducted and responses used to inform future drafts of the DPD.	Meghan Rossiter	January 2012
Need to engage with travelling communities to promote ownership of the document.	Direct contact with all travelling community groups in B&NES and potential engagement of community representatives at future events.	Contact with all travelling community groups in B&NES.  Representatives of the travelling communities engaging with consultations and appearing at / facilitating events.	Meghan Rossiter	January 2012

This Equalities Impact Assessment will need to be updated at each stage of the document's progress.	Review the Equalities Impact Assessment against the Options stage DPD.	Refreshed Equalities Impact Assessment.	Meghan Rossiter	January - May 2012
---	--	---	-----------------	--------------------

## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

**Signed off by:**

(Divisional Director or nominated senior officer)

**Date:**