

Greater Norwich Development Partnership

Diversity Impact Assessment for the Joint Core Strategy Submission Content

Joint Core Strategy for Broadland, Norwich and South Norfolk
Addressing the Judgment of Mr Justice Ouseley in Heard v Broadland District Council,
South Norfolk District Council and Norwich City Council

December 2012

Jobs, homes, prosperity for local people



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1. Introduction

- 1.1 Broadland District Council, Norwich City Council and South Norfolk Council are committed to carrying out Diversity Impact Assessments as a means of integrating diversity objectives within the mainstream activities of the three Councils.
- 1.2 The Joint Core Strategy (JCS) sets the spatial planning framework to deliver regeneration, development and growth within the three districts. The JCS Submission Content forms part of this overall strategy. It will deliver the spatial elements of the Sustainable Community Strategies for the three districts. The overarching aim of the strategy as a whole is to build sustainable communities with the key elements including:
- The opportunity to play an active part in community life and be involved in decision making
 - Healthier and safer places and a high quality environment
 - Access to suitable housing, jobs, facilities and services
 - Opportunities for people to learn at all stages of life
 - The right transport infrastructure so people can travel using varied forms of transport
- 1.3 An initial assessment was carried out in relation to the original submission of the JCS to identify any potential impacts that there may be in regards to the six strands of the diversity agenda that were relevant at the time. This has now been updated to consider the additional three strands which have since been defined

2. Test of Relevance

- 2.1 The first step of the Diversity Impact Assessment is to provide an indication on whether the function has a 'high', 'medium' or 'low' impact against the diversity criteria. This is called the test of relevance. Appendix A contains the full results of the test of relevance.
- 2.2 In summary, the findings remain consistent with the original assessment and suggest that the plan may have a high relevance on race and a medium relevance on age.
- 2.3 With regards to race, this is due to the strategy providing for permanent and transit Gypsy and Traveller sites that will reduce the potential issues associated with unauthorised sites and may tackle a number of disadvantages faced by these communities, particularly relating to low educational achievements and poor health. It will also assist community cohesion by providing properly serviced sites that will not give rise to issues raised by settled community which are generally associated with unauthorised sites. However it has been identified that community cohesion may be an issue in locations where new Gypsy and Traveller sites are proposed. Opportunities will be sought to foster trust between the settled and travelling community and reduce

suspicion and people's negative perception of Gypsy and Travellers which is often a result of issues associated with unauthorised sites. The Gypsy and Travellers will also be encouraged to use mainstream education and health services which will aid integration particularly among the younger generation.

- 2.4 In relation to age, the strategy provides for housing of different scales across a range of settlements. The housing will be of appropriate mix of sizes, types and tenures which will be suitable for people of different ages. The affordability of housing is of concern to many young people and as such the increased provision of affordable housing will help those in housing need. Furthermore an increase in jobs (particularly higher value, knowledge economy jobs) in the area will help retain younger people in the Norfolk area rather than them moving away to seek alternative employment.
- 2.5 All other strands have a low relevance. This is due to the plan being high level and not designed to contain specific detail.

3. Screening

- 3.1 A screening exercise was undertaken in connection with the original JCS policies. This used baseline data and consultation responses to identify whether different groups have different needs in relation to the strategy. This is considered to remain accurate and is outlined below.
- 3.2 At the time of the original submission Civil Partnership/Marriage, Gender Reassignment and Pregnancy/Maternity were not identified as strands of the diversity agenda. Consideration has now been given to whether there is likely to be a significant impact upon these strands. The impact of the Strategy on these strands is considered to be of low relevance. Therefore, further screening has not been carried out.

4. Baseline data

- 4.1 A range of information has also been collected and analysed to provide baseline information about the area and several evidence studies have been undertaken to help identify whether different groups have different needs. The findings are summarised below.
- 4.1.1 In general there is an older population in Broadland and South Norfolk, whereas more younger people aged between 15 and 44 live in Norwich. Migration between the districts is characterised traditionally by couples and older people moving out of the urban areas and into the suburban and rural locations, while younger people or single people of all ages, show a preference for living in the city. Nearly half of the population of Broadland and South Norfolk are over 45, compared to only 35% in Norwich.

- 4.1.2 Broadland and South Norfolk are likely to experience a continue fall in the share of younger people and an increase in the population aged over 45 years old. As the population grows and ages, the need to supply facilities and services and in particular the access to them, especially in the rural area, will become increasingly pressing. An increasingly ageing population and a rising level of people with disabilities will require homes to be built to lifetime homes standards as well as the need to provide specialised accommodation where appropriate including supported housing, care facilities and retirement communities.
- 4.1.3 The retention and attraction of young people through jobs provision and access to the housing market is a key priority. There is a need to expand all sectors of the economy and workforce but in particular to increase the proportion of higher value, knowledge economy jobs. Opportunities for innovation, skills and training need to be expanded in parallel. This would help retain younger people in the Norfolk area rather than them moving away to seek alternative employment.
- 4.1.4 With regards to both housing and employment the needs of the younger and older population differ. Everyone should be able to have access to suitable housing that reflects their needs and there needs to be excellent opportunities for lifelong learning and personal development to contribute to the life of their communities, and to the economy.
- 4.1.5 There is an identified need in the area for Gypsy and Travellers site to reduce the potential issues associated with unauthorised sites and to tackle a number of disadvantages faced by these communities, particularly relating to low educational achievements and poor health. Sites should ideally be in locations which facilitate access to local services and which particularly for transit sites follow the patterns of movement of the community.
- 4.1.6 The proportion of the population for whom English is their second language is increasing. This is likely to have implications for the future provision of services and facilities such as education and community learning.

5. Consultation process

- 5.1 Extensive consultation was carried out through the process of producing the plan with particular effort being made to ensure that the plan reflected the views of as many interest groups as possible including some traditionally 'hard to reach' groups- the elderly, children, disabled community, ethnic minority and faith groups. Issues raised by stakeholders are as follows:
- The need for a range of city centre service functions, beyond retailing was recognised, including facilities for education, training, health and young people.

- For leisure developments respondents supported a strategy that would provide a wider range of facilities for all age groups rather than just focusing primarily on young people.
- In relation to Gypsies and Travellers, responses showed support for transit sites close to the A11 and A47 routes through the area. Respondents also favoured (by a small margin) the provision of more smaller sites, rather than large sites for travellers, but opposed provision of sites within the growth areas.
- Ensure that there is sufficient capacity in schools.
- Health provision for the growing elderly population.
- Better graduate opportunities and more employment opportunities in service sector jobs.
- Homes should be more suitable for old people and there is a need for more family houses with gardens.
- Young people raise the issues of:
 - the need for more affordable housing
 - insufficient jobs in the area
 - cost, reliability, poor level of bus service in the area
 - the need for more varied leisure opportunities at an affordable price
 - the need for more green spaces.
- Friends, Family and Travellers raise the issues of:
 - The limit on site size is arbitrary
 - Site search for residential sites should not be contained by main routes
 - The policy makes no mention of the separate and distinct needs of New Travellers in particular

6. Actions

- 6.1 This Joint Core Strategy is the top level strategy of the Local Development Framework and is not designed to contain a precise level of detail. As such it is not possible to carry out a full impact assessment and assess the impact on all equality strands. More detailed policies and proposals will follow in Local Development Documents as part of the Local Development Framework e.g. Site Allocations, Area Action Plan and Development Management Policies. These documents will be subject to equality impact assessments but in many instances it will not be until the action stage e.g. masterplan or planning application stage that a full impact assessment will be required. This initial impact assessment will be used to inform these plan and proposals from the early stages to ensure all the above issues are taken into consideration at the appropriate stage.
- 6.2 The potential adverse impacts which this screening exercise has flagged up and which must be taken into consideration at the more detailed policies and proposals stage are as follows:

- New sites for Gypsy and Travellers must be provided in appropriate locations with everyone having the opportunity to have an input. Their location must be justified and should not be a result of NIMBYism (Not In My Back Yard attitude). Community cohesion may be an issue in locations where sites are proposed as it is part of our duty to promote good relations and foster trust between the settled and travelling communities.
- The needs of the younger and older generations differ and it is our responsibility to ensure that everyone can access suitable housing, employment, education and services that reflects their needs.

7. Concluding remarks

- 7.1 The evidence does not suggest that this Joint Core Strategy could potentially adversely affect people due to age, disability, gender, race, religion/belief, sexual orientation, civil partnership/marriage, gender reassignment or pregnancy/maternity. This strategy 'sets the scene' for future policies and proposals which will all be subject to a Diversity Impact Assessment at the action stage.

Appendix A – Diversity Impact Assessment

Name of policy or function: Joint Core Strategy for Broadland, Norwich and South Norfolk Submission Content

Date relevance test conducted: 11/12/12

Is the policy or function:
(Please tick as appropriate)

New ✓

Revised

Existing

Can the delivery of this policy or function help the council deliver the following equality duties?	Equality Strands																										
	Race			Gender			Disability			Age			Sexual Orientation			Religion / Belief			Civil Partnership / Marriage			Gender Re-assignment			Pregnancy / Maternity		
1. Promoting equality of opportunity	H			L			L			M			L			L			L			L			L		
2. Eliminating discrimination	H			L			L			L			L			L			L			L			L		
3. Preventing harassment	H			L			L			L			L			L			L			L			L		
4. Promoting good relations	H			L			L			L			L			L			L			L			L		
5. Encouraging participation in public life	L			L			L			L			L			L			L			L			L		
No. of relevant elements per strand	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L
	4	0	1	0	0	5	0	0	5	0	1	4	0	0	5	0	0	5	0	0	5	0	0	5	0	0	5
Total:	H 4									M 1									L 34								

Priority level:

High relevance: The policy or function is relevant to **4 or 5** elements of the general equality duty.

Action required: Complete a full diversity impact assessment during **year 1**.

Medium relevance: The policy or function is relevant to **2 or 3** elements of the general equality duty.

Action required: Complete an initial screening and/or a full impact assessment by **year 2**.

Low relevance: The policy or function is relevant to **0 or 1** elements of the general equality duty.

Action required: Complete an initial screening by **year 3**.

For more information or if you
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format or language, please phone:

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Diversity Impact Assessment

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