

# Appendix 3



**South  
Cambridgeshire  
District Council**

# EQUALITY IMPACT ASSESSMENT

## Full Assessment Form

This form is for use in undertaking a full equality impact assessment of a policy following the findings from an equality screening.

<b>Name of Policy being assessed</b>	<b>Statement of Community Involvement</b>
<b>Service Area</b>	<b>Planning and Economic Development</b>
<b>Lead Officer</b>	<b>Caroline Hunt, Strategy &amp; Economy Manager</b>
<b>Team</b>	<b>Greater Cambridge Shared Planning Policy Team</b>
<b>Completion date of equality screening</b>	<b>14/06/2019</b>
<b>Start date of assessment</b>	<b>28/05/2019</b>
<b>Completion of assessment</b>	<b>14/06/2019</b>

## **A. STATUS AND SCOPE OF THE POLICY BEING ASSESSED**

For the purposes of this assessment, the term 'Policy' refers to a Policy, Strategy, Programme, Procedure, Function or Decision.

### **A1. What are main aims, objectives, purpose and intended outcomes of the Policy?**

The Statement of Community Involvement (SCI) sets out how Cambridge City Council and South Cambridgeshire District Council will engage the public in the planning process. The SCI describes how the public, businesses and interest groups within the local authority areas can get involved in the creation of local planning policy and the planning application process which shapes where we live, work and trade. This is essential to help improve understanding and openness of the planning process.

There is a legal requirement on Local Planning Authorities (LPAs) to undertake public consultation on local plans, neighbourhood plans and planning applications. It is important that this is undertaken in a cost-effective, efficient and proportionate manner. This SCI is an important document as it will establish a minimum standard of consultation and publicity on planning matters for both Cambridge City and South Cambridgeshire District Councils.

The SCI has been split into three sections which cover the following roles and responsibilities of the planning service:

- Planning Policy including the production of planning policy documents including the Local Plan
- Development Management including how the councils consider and publicise planning applications, and
- Neighbourhood Planning setting out how the councils will assist groups who are preparing neighbourhood plans

The Councils are committed to treating everyone fairly and justly, and wants to ensure that everyone gets an opportunity to be involved in the planning process. We recognise that consultation and engagement activities are constantly evolving and this SCI will be revisited at regular intervals to ensure it is fully up-to date and reflects local and national priorities, practices and policies.

### **A2. What is the status of this Policy? (New, existing or under review)**

The Statement of Community Involvement is a new document which sets out how both South Cambridgeshire District and Cambridge City councils will communicate and engage with the community in planning matters related to plan making, development management and neighbourhood planning.

### **A3. What is the timescale and decision-making route for approval of the Policy?**

The SCI has been published for public consultation and the representations received have been considered in finalising the document. Subject to Cabinet approval, the Statement of Community Involvement will be adopted by the Council at Cabinet on 1<sup>st</sup> July 2019. As the

SCI will be a joint document for both councils, it is due to be adopted by Cambridge City Council on 24<sup>th</sup> June 2019.

**A4. Is this policy associated with the Council's strategic Aims, Approaches and Actions (The Three 'A's)? If so, please state the relevance and association to The Three 'A's.**

It is linked to the Council's Aim of putting the heart into Cambridgeshire by:

**Growing local businesses and economies** – Supporting our businesses to be greener by allowing them to engage in the planning system using electronic communications.

**Housing that is truly affordable for everyone to live in** – Working with developers, parish councils and local people to raise the standards of new homes and communities through effective lines of communication.

**Being green to our core** – Making sure the environment is fully considered in all new major transport routes, including tree planting and habitat enhancement to offset developments by consulting with the relevant local and national environmental and biodiversity organisations. Reducing how much waste we generate as a community, increasing recycling and reducing recycling contamination by continuing to consult on planning policy and applications through electronic methods.

**A modern and caring Council** – Using technology to improve access to Council services for businesses and residents so they track the progress of things they report, pay, and apply for online.

**A5. Who are the intended beneficiaries/stakeholders of the policy or function? How many people are affected and from what sections of the community?**

The SCI sets out how the public will have an opportunity to engage in the planning process in Greater Cambridge. The SCI describes how the public, businesses, interest groups and individuals within the local authority areas can get involved in the creation of local planning policy and the planning application process aiming at shaping where we live, work and trade. Therefore the SCI has the potential to affect a large and wide ranging proportion of the community, including:

- Residents across Greater Cambridge
- Local Parish Councils and designated Neighbourhood Forums
- District and City Council Members
- Cambridgeshire County Council
- Adjacent Local Authorities
- Cambridgeshire and Peterborough Combined Authority
- Delivery partners, including land owners, developers, infrastructure providers, transport providers
- Community organisations
- Statutory, general and wider consultation bodies
- Local businesses

**A6. Are external partners involved in delivering this policy? If so, what are their roles, and level of involvement/influence?**

No

**B. EVIDENCE, DATA AND CONSULTATION**

It is important to consider all information that is available in determining whether the Policy could have a differential impact. Please include examples of monitoring information, research or consultation reports.

**B1. What monitoring or other information do you have about relevant target groups, which will show the impact of the Policy?**

The SCI is concerned with the processes for enabling everyone to get involved in the planning process.

The Authority Monitoring Report will include data on any consultations that have been undertaken during the relevant monitoring period, and will use the following indicators:

- Number of people participating in consultation
- Number of people using the councils' online website to make representations

**B2. Have you compared the data you have with the equality profile of the local population? What does it show?**

The Council's [Equalities Scheme](#) shows South Cambridgeshire is a rural area with a population which is expected to grow at faster than the national average. A growing elderly population, greater mobility, immigration and other social trends are making changes to the population. These changes will accelerate as a result of the population growth facing the district in the next ten years or so, leading to a far more diverse society than previously. The following is a snapshot of the people of South Cambridgeshire:

- At present approximately 19% of the South Cambs population falls within the 65+ age group and this is expected to grow to approx. 22% in 2031.
- In 2011 approx. 14% declared a disability whereby day-to-day activities are limited a little or a lot.
- The 2011 Census data shows that in South Cambridgeshire 87.3% of the population were White British (which has fallen in the last ten years from 93.2%) and 6% declared themselves as White Irish, White Gypsy/Irish Traveller and White Other.

The SCI is expected to have neutral impacts on several protected characteristics; including age, disability, religion and rurality (see D below).

**B3. Have you identified any improvements or other changes that could be made from monitoring the data?**

Monitoring processes will enable the council to identify trends in public consultation for both planning policy documents and planning applications, enabling the councils to identify future measures that may be necessary to address any reduction in consultation responses or lack of engagement with particular parts of the Greater Cambridge community.

**B4. Have you consulted or involved external stakeholders about the policy or function? If so, what were their views?**

Whilst there is no mandatory requirement for consultation on a draft SCI, Cabinet in January 2019 agreed that the draft SCI should be published to seek the views of the wider community on the draft document. The public consultation period commenced on Monday 11 February and concluded on Monday 25 March 2019. The consultation period was carried out in accordance with the requirements for Supplementary Planning Documents (see Table 2 of the SCI attached at Appendix 1). There were a total of 12 representations received during the consultation period and they have been considered when preparing the SCI. The representations are considered in further detail in the Consultation Statement. In summary, a single amendment is proposed to the SCI on the basis of the representations received, which is to include direct links to the webpages for viewing or commenting on planning applications for both Councils.

**B5. Have you undertaken any consultation with staff to assess their perception of any impacts of the policy or function? If so,**

**what has been learnt from them?**

The preparation of the Statement of Community Involvement has been a cross departmental process and has involved meetings and regular input from officers in Planning Policy, Development Management (including enforcement) and Planning Business Support. The document has also been informed by Cambridge City Council's Equality & Anti-Poverty Officer.

**B6. Please provide information about any other consultation, research, or involvement undertaken in relation to this impact assessment.**

None

Based on the evidence and information you have gathered, and any consultations you have carried out, you should:

- Identify any **opportunities to advance equality of opportunity or foster good relations** for people with different protected characteristics (Section C) and;
- **Assess the likely differential impact** – positive or negative - of the policy on people with protected characteristics (Section D).

It is important to **identify whether the Policy could affect some groups of people differently** (a 'differential impact'). It is particularly important to consider whether the policy would *discriminate against or disadvantage people* on the grounds of any of the protected characteristics, or whether there are *any opportunities to better promote equality or good relations* between different groups of people through modifying the Policy.

Use the table below to summarise the findings of the information and evidence you have gathered. This might include statistical data, external research, or feedback from formal or informal consultations with staff or residents. Consider the information as it relates to the range of protected characteristics (listed in the left hand column) before proceeding to Section D.

If there is no information available about the impact (or potential impact) of the Policy on people with a particular protected characteristic, you should note this in the table.

## C. OPPORTUNITIES TO ADVANCE EQUALITY OF OPPORTUNITY OR FOSTER GOOD RELATIONS

**You do not need to fill in every single box.** The questions are there as a guide, and are prompts to help you consider the way that a policy or decision will impact on people with different protected characteristics before proceeding to Section D.

Protected Characteristics	What does the information or evidence we have gathered tell us about the impact of this Policy on different groups of people?			
	Does the evidence suggest that people with different protected characteristics have different needs or experiences in relation to this Policy?	Could any aspect of the Policy amount to discrimination (either direct or indirect) against people on the grounds of a protected characteristic?	In what ways does this Policy promote <b>opportunities to advance equality of opportunity</b> or <b>foster good relations</b> between people with different characteristics (e.g. male and female; different racial groups)?	From the evidence you have gathered, what opportunities might there be to better promote <b>opportunities to advance equality of opportunity</b> or <b>foster good relations</b> between different groups of people through <b>modifying the Policy</b> in some way?
<b>Age</b>	Yes	No	The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.	None
<b>Disability</b>	Yes	No	The SCI sets out how all members of the community can participate in the planning process across	None

			both South Cambridgeshire and Cambridge City.	
<b>Gender Reassignment</b>	No	No	The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.	None
<b>Marriage and Civil Partnerships</b>	No	No	The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.	None
<b>Pregnancy and Maternity</b>	Yes	No	The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.	None
<b>Race</b>	No	No	The SCI sets out how all members of the community can participate in the planning process across both South	None

			Cambridgeshire and Cambridge City.	
<b>Religion/Belief</b>	No	No	The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.	None
<b>Sex</b>	No	No	The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.	None
<b>Sexual Orientation</b>	No	No	The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and Cambridge City.	None
<b>Others e.g. Rurality; caring responsibility; working pattern etc.</b>	Yes	No	The SCI sets out how all members of the community can participate in the planning process across both South Cambridgeshire and	None

			Cambridge City.	
--	--	--	-----------------	--

<b>D. DIFFERENTIAL IMPACT OF THE POLICY</b>		
Assess the potential differential impact on each of the following protected characteristics. The impact could be negative, positive or neutral. <b>If you assess a negative impact for any of the groups then you will need to assess whether that impact is low, medium or high.</b>		
<b>DESCRIPTION OF IMPACT</b>	<b>Nature of Impact</b> (Positive, Neutral, Adverse)	<b>Extent of Impact</b> (Low, Medium, High)
<b>AGE:</b> Identify the potential impact of the policy or function on different age groups.		
It is anecdotally recognised that it can sometimes be more difficult to engage with younger age groups, and where possible and appropriate relevant organisations and individuals will be identified to reach as wide an age range as possible. This could include external organisations such as ChYPPS (Children and Young People's Participation Service, Cambridge City Council). Evidence suggests that some older people and those from lower income households are also less likely to have access to the internet. The Council has a Digital Inclusion Strategy in order to support people who are excluded from using the internet gain access and skills they need to use it.	Neutral	
<b>DISABILITY:</b> Identify the potential impact of the policy or function on disabled people.		
The SCI identifies a range of external groups and organisations that may be consulted on planning matters, whilst the Greater Cambridge Shared Planning service has a Disability Panel operating within Cambridge City helping to feedback on impacts new developments have on people with a range of disabilities.  The consultation document can be made available on request in large copy print, audio cassette or Braille and officers are willing to meet individuals and talk issues through. This approach would also apply, as necessary, to subsequent consultation documents that are prepared in the plan making process. In respect of planning applications, information can be made available in a range of formats if required.	Neutral	

<b>GENDER REASSIGNMENT:</b> Identify the potential impact of the policy or function on people that have changed gender identity.		
No equality impacts have been identified at this stage that is specific to this equality group.	Neutral	
<b>MARRIAGE AND CIVIL PARTNERSHIPS:</b> Identify the potential impact of the policy or function on people who are married or in a civil partnership.		
No equality impacts have been identified at this stage that is specific to this equality group.	Neutral	
<b>PREGNANCY AND MATERNITY:</b> Identify the potential impact of the policy or function on pregnant or maternal mothers and those women who wish to breastfeed.		
Where people are required to care for children, it may be difficult for them to engage in consultation events and meetings. A number of the planning policy consultation events take place within and outside of usual working hours to try and ensure residents and businesses are able to engage in the process. Planning applications are available for public inspection online and can be accessed at any time of the day.  No equality impacts have been identified at this stage that is specific to this equality group.	Neutral	
<b>RACE:</b> Identify the potential impact of the policy or function on different ethnic groups, including national origins, colour and nationality.		
No equality impacts have been identified at this stage that is specific to this equality group.	Neutral	
<b>RELIGION/BELIEF:</b> Identify the potential impact the policy or function on different religious/faith groups.		
No equality impacts have been identified at this stage that is specific to this equality group.	Neutral	
<b>SEX:</b> Identify the potential impact of the policy or function on men and women.		
No equality impacts have been identified at this stage that is specific to this equality group.	Neutral	
<b>SEXUAL ORIENTATION:</b> Identify the potential impact of the policy or function on lesbian, gay men, bisexual or heterosexual people.		
No equality impacts have been identified at this stage that is specific to this equality group.	Neutral	

group.		
<b>OTHER CHARACTERISTIC SPECIFIC TO SOUTH CAMBRIDGESHIRE – RURALITY:</b> Identify the potential impact of the policy or function on people who are rurally isolated.		
<p>It can be difficult to contact some low income groups if they have limited access to the internet and transport, and the SCI sets out that where additional mechanisms are required to improve levels of engagement on planning matters that bespoke methods may be used. This will be considered in detail taking into account the subject matters and geographic scope of each new stage of plan making, and in respect of planning applications.</p> <p>Evidence suggests that some older people are also less likely to have access to the internet. The Council as a Digital Inclusion Strategy in order to support people who are excluded from using the internet gain access and skills they need to use it.</p> <p>Rural access to high speed internet is also an issue within the district and part of the council's Business Plan is to work with partners to improve broadband and mobile phone coverage across the district. To assist with viewing planning documents online, the councils' will generally split large documents, such as a Design and Access Statement, when they exceed 50 pages or 10MB in file size to assist users with downloading and viewing large files.</p>	Neutral	

## E. ACTION PLAN

You should now be able to identify whether the Council needs to take any action to eliminate discrimination, disadvantage or unfair impact, or to make changes to more effectively promote equality, diversity or good relations. Alternatively, you might have identified that you cannot fully assess the impact of the policy on different groups until you have more information, data or other evidence.

Actions that you might identify at this stage could include:

Changes to the policy itself

Collecting and analysing data not currently available

Consulting further with staff, residents and customers in order to find out more about how the policy or decision will affect people

Undertaking surveys or other research.

Action/change required	Responsibility	Timescale	Resources required	What issue/problem will this action address?
Monitoring of the number of consultation responses to both planning applications and planning policy documents	Greater Cambridge Shared Planning Policy Team	Authority Annual Monitoring Report to be endorsed by Members, usually in December each year.	From within existing resources within the Greater Cambridge Shared Planning Policy Team	

## F. RECOMMENDATION

You should now recommend whether the Council should adopt, modify, pilot or reject the policy (please indicate your proposed recommendation from the options below).

<b>Adopt the policy in its originally proposed format (no issues identified)</b>	<b>X</b>
<b>Modify the policy to address any negative impact or to better exploit any potential to promote equality, diversity and good relations</b>	

<b>Continue with the policy despite identifying issues (note: justification must be provided)</b>	
<b>Reject the policy entirely, due to the findings of the EqIA</b>	
<b>Pilot the policy and re-evaluate the equality impact after the pilot period</b>	
<b>Modify the policy to meet separate statutory changes, not linked to equality/diversity</b>	
<b>Please briefly set out your reasons for this recommendation.</b>	

<b>SIGN OFF: The officers below confirm that this full assessment has been completed in accordance with the Council's guidance</b>		
<b>Signature of Lead Officer</b>	C Hunt	<b>Date: 19/06/2019</b>
<b>Signature of Head of Service or Director</b>	S Kelly	<b>Date: 19/06/2019</b>

Please retain the original form in your service area and return an electronic copy of the completed form to the Policy and Performance Team for publication.