



Staffordshire Moorlands Local Plan

Equalities Impact Assessment

September 2020

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Introduction

1 Introduction

1.1 The purpose of this report is to show how the Council has complied with the Public Sector Equality Duty (set out in the Equality Act 2010)⁽¹⁾ in the assessment of Staffordshire Moorland's emerging Local Plan. The broad purpose of the Equality Duty is to integrate consideration of equality and good relations into the day-to-day business of public authorities.

1.2 The Equality Impact Assessment (EqIA) has considered the impact, or likely impact, of the development strategy, policies and proposals outlined in the Local Plan on different equality groups, including women, people from ethnic minorities and those with disabilities. This assessment has taken place throughout the plan production process and the findings at each stage have been summarised, culminating in this final report to accompany the adopted Local Plan.

1.3 An EqIA is a tool to assist public authorities with assessing the impact, or likely impact, of their policies and functions on people who share a relevant protected characteristic. It assists authorities with identifying adverse outcomes and steps that can be taken to mitigate adverse effects. EqIAs help public authorities meet the requirements of their equality duties and to identify active steps to promote equality.

1.4 One of the 12 core planning principles set out in paragraph 17 of the 2012 National Planning Policy Framework (NPPF) is that local planning authorities should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities to meet local needs. It is considered that the EqIA can help inform this process by understanding the needs of different community groups and how planning policies and decisions can affect them.

1.5 The Council's Statement of Community Involvement, adopted in April 2016, details Staffordshire Moorlands District Council policy and guidance on public consultation, with a commitment to promoting equal opportunities.

1.6 This report:

- Identifies the Council's actions under the Equality Duty that will affect or influence the Local Plan;
- Provides baseline information on issues and needs related to each equality group;
- Considers key equality issues of the Local Plan;
- Sets out an appropriate methodology and framework for the EqIA assessment;
- Documents the results of the initial EqIA assessment;
- Documents the results of the appraisal of the Preferred Options Local Plan (July 2017);
- Documents the results of the appraisal of the Local Plan Submission Version (February 2018);
- Documents the results of the appraisal of the Local Plan Submission Version pre-hearing Minor Modifications (June 2018);

1 <https://www.equalityhumanrights.com/en/equality-act-2010/what-equality-act>

- Documents the results of the appraisal of the Local Plan Submission Version post-hearing Main and Additional Modifications (September 2019); and
- Documents the results of the appraisal of the final set of Main Modifications accompanying the Inspector's Report and the final version of Additional Modifications, i.e. those integrated into the final version of the Local Plan for Adoption.

1.7 Please note that this Equality Impact Assessment Report has been prepared alongside the Local Plan Submission Version and subsequent pre-hearing minor modifications and post-hearing main and additional modifications to this document. Its findings have been used to help inform the plan policies and proposals. This document is the final updated version to reflect the content of the Inspector's Report including his set of main modifications and the Council's final additional modifications and will be published alongside the adopted Local Plan.

Stages of Local Plan Preparation

Stage	Timetable	Link to Equality Impact Assessment
Collecting evidence	2014 onwards	The Council adopted its Core Strategy in March 2014. The SA of the Core Strategy included an Equality Impact Assessment of the plan's policies and proposals.
Issues and options	July - September 2015	Consultation on Site Options for the Local Plan.
Preferred options sites and boundaries	April - June 2016	Council adopted a Statement of Community Involvement setting out how the Council will involve local people, businesses and other stakeholders, including a commitment to promoting equal opportunities. Engaging Communities commissioned to speak to people about their experiences and needs in relation to the Council's responsibilities under the Equality Duty.
Preferred options	July 2017	Equality Impact Assessment report published for consultation alongside Preferred Options Local Plan.
Publication	February 2018	Equality Impact Assessment report published for consultation alongside Submission Version Local Plan.
Submission and Examination	June 2018 September 2019	Equality Impact Assessment report update published to assess proposed pre-hearing minor modifications to Submission Version Local Plan. Equality Impact Assessment report update published to assess proposed post-hearing main and additional modifications to Submission Version Local Plan.

Stage	Timetable	Link to Equality Impact Assessment
Adoption	September 2020	Final Equality Impact Assessment Report published on date of Local Plan adoption. This document forms a full record of the Equality Impact Assessment process throughout production of the Staffordshire Moorlands Local Plan including assessment of the content of the Inspector's Report and the Council's final Additional Modifications.

Table 1.1 Stages of Local Plan preparation and links to Equality Impact Assessment

Public Sector Equality Duty

2 Public Sector Equality Duty

2.1 The Equality Act 2010 places duties on the Council; it requires all councils to publish information about their compliance with the Act. Information and guidance about the Act can be found at the Equalities and Human Rights website:

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-guidance>

2.2 The Equality Duty does not impose a legal requirement to conduct an EqIA. However, it is considered that the EqIA is an important tool in demonstrating that the Local Plan decision making process has involved recognition of the three aims of the Equality Duty. These are to:

- Eliminate unlawful discrimination;
- Advance equality of opportunity; and
- Foster good relations.

2.3 The EqIA is a tool for systematically testing out new plans, policies and developments and reviewing services to make sure that actual or potential barriers have been identified and removed and opportunities to promote equality are maximised. The scope of the EqIA follows the scope of the Equality Duty, covering the following protected characteristics: race, disability, gender, gender reassignment, age, sexual orientation, religion or belief, pregnancy and maternity and social deprivation. People with these characteristics are considered under the Act to be "protected groups".

Staffordshire Moorlands District Council and the Equality Duty

2.4 In April 2010 Staffordshire Moorlands published "Bringing People Together" - its joint strategy for community cohesion and inclusion in High Peak and Staffordshire Moorlands. The strategy shows how Staffordshire Moorlands District Council will go about achieving community cohesion and social inclusion for the benefit of all residents.

2.5 The Strategy notes that effective community cohesion leads to stable and well integrated communities with residents who feel that people from different backgrounds get on well together. The strategy is based on the desire to build safer and stronger neighbourhoods and is linked to a shared vision for the alliance between Staffordshire Moorlands and High Peak Borough Council to deliver key services that will improve the quality of people's lives in the two authorities and deliver greater value for money.

2.6 Staffordshire Moorlands Equality and Diversity Policy was approved in January 2015 and sets out how the Council will go about fulfilling its Equality Duty, detailing the expectations for how everyone working for, or involved at, the Council will work to achieve our aims⁽²⁾.

2.7 The Council has published its Equality and Diversity Scheme: Action Plan 2017 with Corporate Equality Objectives: 2018/19. "Equality" refers to treating people fairly. "Diversity" refers to valuing people's differences. The Council considers that getting its approach to equality and diversity right will bring significant benefits for the communities the Council serves, its customers and workforce.

2.8 The equality action plan is reproduced in Appendix 2 of this Report.

2 https://www.staffs Moorlands.gov.uk/media/756/Equalities-Policy-Staffordshire-Moorlands/pdf/Equalities_Policy_Staffordshire_Moorlands.pdf

The Staffordshire Moorlands Local Plan

3 The Staffordshire Moorlands Local Plan

3.1 The Local Plan is the Development Plan for Staffordshire Moorlands and its policies form the basis for planning decisions in the District. It sets out the vision, objectives, spatial strategy and policies for the development of Staffordshire Moorlands for the period up to 2033. This means that the Local Plan covers a range of matters including:

- How many new homes will be required and where they should be located;
- How much employment land is needed and where it should be provided;
- Protecting and improving important open areas and providing new ones;
- Provision of new transport infrastructure including roads, cycle routes and footpaths; and
- How town centres and community facilities in the District could be improved.

3.2 The Local Plan identifies overarching objectives for spatial planning in Staffordshire Moorlands. It will be used by everyone who wants to see how the District will change and what new development is envisaged over the next 15 years. The Local Plan also identifies sites that will accommodate most of the development intended.

3.3 This Report provides an account of the Equality Impact Assessment of the Staffordshire Moorlands Local Plan at key stages throughout the plan production process including the initial stage in 2014 (prior to any consultation), Preferred Options 2017, Submission Version 2018 and subsequent pre-hearing minor modifications (June 2018) and post-hearing main and additional modifications (September 2019) as well as assessment of new modifications accompanying the Inspector's Report (published in July 2020) and the Council's final Additional Modifications schedule. Consequently, the assessment findings at each key stage have been taken into account when considering the wording of plan policies throughout the process.

Methodology

4 Methodology

4.1 Staffordshire Moorlands District Council has undertaken an Equality Impact Assessment of the emerging Local Plan in three stages:

- Stage 1: Initial Equality Impact Assessment.
- Stage 2: Full Equality Impact Assessment.
- Stage 3: Subsequent Screening Assessments to reflect policy wording amendments.

4.2 Baseline data is included at Appendix 1 of this report.

Initial Equality Impact Assessment

4.3 The Initial Equality Impact Assessment was carried out in July 2014 and is recorded in section 10 of this report. The format of the Initial Assessment was the completion of a standard proforma to screen the draft Local Plan at issues and options stage to help identify if there was a risk of any potential differential impact on any of the protected groups from implementing the provisions of the Plan.

4.4 The Initial Equality Impact Assessment concluded that there was potential for the emerging Local Plan to have a differential impact on identified equality groups and a full Impact Assessment would be required.

4.5 One of the key findings of the Initial EqIA was that not enough was known about some protected characteristic groups at a local level, and that further research was necessary before a full EqIA could be undertaken, in order to ensure that no issues were missed.

Full Equality Impact Assessment

4.6 In 2016 Staffordshire Moorlands District Council commissioned consultants Engaging Communities to speak to people about their experiences and needs in relation to the Council's responsibilities under the Equality Duty. The purpose of the research was to reflect the experiences of five protected characteristic groups - race, religion, disability, sexual orientation and gender reassignment- living in and around Staffordshire Moorlands and High Peak.

4.7 Focus groups were used in the first instance to gain insight from members of the protected characteristic groups. It was considered that the advantage of using focus groups was that it provided an opportunity to explore the attitudes, feelings, beliefs, experiences and reactions of participants in ways that are not feasible with other methods.

4.8 In addition to this, semi-structured interviews were carried out with some participants dependent on their preference. The informal atmosphere of a semi-structured interview was considered to encourage openness from participants and also offer the researcher flexibility to adjust the questions and change direction as an interview progressed.

4.9 This was a qualitative research project meaning that there were a small number of participants and the findings, whilst not statistically analysed, have been analysed by themes. There was a focus on five protected characteristic groups: race, religion, disability, sexual orientation and gender reassignment. However there was a reluctance amongst people from two protected characteristic groups in particular (race and religion) to take part in the research and this means that the findings have been more influenced by experiences of people from other characteristic groups.

4.10 Key findings from the research are set out in Table 6.1. Recommendations for future action by the Council were also included in the report. Those with a relevance to planning are as follows:

- Develop a programme of engagement with specific interest groups (e.g. race and religion) in order to engender trust and good relationships before embarking on any further research to establish needs; and
- Give consideration of the types of properties that are being developed in the locality and the make up of household types in those properties.

4.11 The District Council has previously forged links with community groups and people who fall within some of the protected characteristic groups - older people, younger people and those with disabilities. However, many of these groups no longer exist. Looking at the issues raised through the outreach work undertaken as part of the Council's Core Strategy preparation in 2007/8, it is very likely that these are still relevant now, so they have been included in Table 6.1.

Preferred Options 2017

4.12 Using the findings from the Engaging Communities research, and evidence from the EqIA of the Core Strategy, a full Equality Impact Assessment was undertaken in early 2017. This assessment took the issues and needs raised by the protected groups and assessed the Local Plan's preferred option policies and proposals against them to identify the nature of any likely impact. The results of this appraisal contributed to the plan making process by helping to refine the emerging Local Plan in readiness for public consultation held in July 2017. Following this public consultation, the next stage in the process is production of a Submission Version of the Plan to be examined by an independent planning inspector. In order to produce this plan, the results of the public consultation were assessed and amendments were made where appropriate. This included an assessment of changes to Local Plan policies to identify the nature of any likely impacts.

4.13 The assessment tables are included at section 6 of this report. Section 7 details the amendments made as a result of Local Plan consultation in July 2017 alongside an equalities impact screening to determine any likely significant effects and consequently any further changes needed to the plan to address any negative equality impacts. The conclusions are summarised at section 5.

4.14 Chapter 6 and in particular Table 6.1, show the needs and issues identified by the protected groups from research conducted by the Council and the relationship of these issues to the Local Plan. This table also records whether a health impact is likely.

4.15 The needs and issues raised by representatives of protected groups in Table 6.1 were then grouped and summarised into a number of key themes as follows. In order to address the key equality impacts identified, the Local Plan will need to:

- Deliver future housing according to the diversity of local needs, including new homes that are affordable and adaptable as well as extra care housing where needed.
- Provide access to employment opportunities, from all sectors of the economy and located close to where people live.
- Deliver safe and inclusive communities.
- Ensure appropriate levels of community infrastructure, including facilities for health and recreation, that are well located and readily accessible.

4.16 These key equality themes were used as criteria to assess the potential impact of the policies and objectives in the emerging Staffordshire Moorlands Local Plan. The results of the assessment are set out in Table 6.2.

Subsequent Screening Assessments to reflect policy wording amendments.

Submission Version February 2018

4.17 As part of the Local Plan production process, amendments were made to policies as a result of the preferred options consultation and any relevant new evidence. Table 7.1 - 'Submission Version Local Plan' shows the equality impact screening to determine any likely significant effects of these amendments. Following this screening assessment it was concluded that no negative equality impacts had been created from the amendments.

Pre-hearing Minor Modifications to Submission Version June 2018

4.18 Pre-hearing minor modifications to address issues raised by the Inspector were the subject of a further equality screening assessment (refer to Chapter 8). At this stage, the amendments were very minor and the screening assessment concluded that no negative equality impacts had been created.

Post-hearing Main and Additional Modifications to Submission Version September 2019

4.19 Following the hearing sessions a further set of main and additional modifications to the Local Plan were agreed by the Council. The screening of these is shown in Chapter 9. Some positive and negative impacts were identified as a result of the amendments. The three negative points all related to the need to comply with national planning policy.

Adopted Local Plan September 2020

4.20 The Inspector's Report, published in July 2020, sets out the Inspector's views on the Local Plan as a result of his examination. It includes a final main modifications schedule, the wording of which is integrated into the Adopted Local Plan. The Council has also produced a final Additional Modifications Schedule of minor amendments, also incorporated into the final Local Plan. The screening of these is shown in Chapter 10. At this stage the few new amendments introduced are either very minor or of a technical nature and the screening assessment concluded that no significant positive or negative equality impacts have been created as a result of these changes.

Conclusions

5 Conclusions

5.1 The assessment tables set out in Chapter 6 have been used to help identify the main equality impacts arising from the policies and proposals of the Staffordshire Moorlands Local Plan. Overall, the assessment demonstrates that the Local Plan has addressed the key issues raised by different communities:

- Delivering future housing according to the diversity of local needs, including new homes that are affordable and adaptable as well as extra care housing where needed.
- Providing access to employment opportunities, from all sectors of the economy and located close to where people live.
- Delivering safe and inclusive communities.
- Ensuring appropriate levels of community infrastructure, including facilities for health and recreation, that are well located and readily accessible.

Housing Needs

5.2 Access to affordable housing including private rental fees is an issue for all equality groups. The main risks associated with the differential impacts identified include:

- Deterioration of rural communities as people are priced out of the housing market and are forced to move away from the area.
- Ageing of population as young people / first time buyers cannot afford housing in the Local Plan area and are forced to move away.
- Lack of secure and suitable accommodation for gypsies and travellers.
- Shortage of appropriate housing for older and disabled people through inflexible housing stock and a lack of suitably designed dwellings.
- Shortage of housing to meet the needs of disadvantaged communities and risk of further disadvantage by not introducing an appropriate mix of housing types and tenures into those disadvantaged areas.

5.3 These risks have been addressed in the Staffordshire Moorlands Local Plan as follows:

1. The **Spatial Vision** for the Staffordshire Moorlands includes: "emphasis on the promotion of sustainable communities with access to suitable housing and facilities and services". The visions for Biddulph and Cheadle in particular identify housing as a key theme. In Biddulph reference is made to a greater variety of housing types and tenures. In Cheadle a focus on growth in housing provision is included in the vision.
2. Local Plan **objective SO4** "To provide new housing that is affordable, desirable, well-designed and meets the needs of residents of the Moorlands".
3. **Policy SS1** 'Development Principles' includes reference to provision of a 'mix of house types and tenures of quality affordable homes'.

4. The Leek, Biddulph, Cheadle and Rural Areas Area Strategies (**Policies SS6 - SS9 inclusive**), all specifically mention affordable housing and house types to meet the needs of their populations.
5. **Policy H3 Affordable Housing:** The provision of affordable housing will be delivered through a number of detailed measures.
6. **Policy H5 Gypsy and Traveller Sites and Sites for Travelling Showpeople:** The Council will review the requirement to provide sites for gypsies and travellers and travelling showpeople through the use of evidence.
7. **Policy H1 New Housing Development:** New housing development should provide for a mix of housing sizes, types and tenure including a proportion of affordable housing, including starter homes, and where appropriate housing for special groups, to meet the needs and aspirations of the current and future population having regard to the Area Strategies. All development will be assessed according to the extent to which it provides for high quality, sustainable housing and to which it meets identified housing needs, having regard to the location of the development, the characteristics of the site and the economics of provision.

In addition:

- Housing for special groups, particularly for older people, should meet a genuine and proven housing need and demand and be of a scale and in a location which is appropriate to its needs.
- Housing proposals of 10 dwellings or more will be required to provide a mix of housing in terms of size, type and tenure on the site. The final mix will be negotiated with the developer based on housing needs as informed by the Strategic Housing Market Assessment and other relevant factors such as available supply and market demand.
- All housing development should be at the most appropriate density compatible with the site and its location, and with the character of the surrounding area.
- Residential development and redevelopment on unidentified (windfall) sites will be permitted within the development boundaries of towns and larger villages and limited infill permitted in smaller villages.
- All new dwellings should aim to provide flexible accommodation which is capable of future adaptation by seeking to achieve adequate internal space for the intended number of occupants in accordance with the Nationally Described Space standard and delivered to meet accessibility standards set out in the Optional Requirement M4(2) of Part M of the Building Regulations.
- All new dwellings must be of sufficient size to provide satisfactory levels of amenity for future occupiers of the dwellings whilst respecting the privacy and amenity of occupiers of existing dwellings.

Employment Opportunities

5.4 The availability of local employment opportunities from all sectors of the economy was identified as a key equality issue. The main risks associated with the differential impacts identified include:

- Decline in the financial security of communities through a lack of employment opportunities and access to work for all groups.
- Further financial deprivation resulting in a negative impact on the well-being of residents - putting pressure on social services - through a lack of accessible employment opportunities in deprived areas.
- Marginalisation of people with accessibility needs if employers fail to comply with equalities regulations that require employment opportunities to be accessible to disabled people.

5.5 These risks have been addressed in the Staffordshire Moorlands Local Plan as follows:

1. Local Plan **objective SO3**. "To develop and diversify in a sustainable manner the District's economy and meet local employment needs in the towns and villages".
2. **Policy SS1 'Development Principles'** includes "maintain the local economy and provide for a modest increase in jobs with an educated, skilled and flexible workforce".
3. The Leek, Biddulph, Cheadle Area Strategies (**Policies SS6 - SS8 inclusive**), all set out measures to create employment growth and increase the diversity of employment opportunities to meet existing and future needs. In the villages (**Policies SS10 - SS12**), measures are set out to meet limited employment needs to maintain the rural economy with emphasis on supporting the development of appropriate ICT and new means of communications to enable homeworking and small businesses reliant on e-technology.
4. **Policy E1 'New Employment Development'**, includes the wording "To ensure that the District's workforce is suitably skilled, the Council will, where appropriate, seek to enter into agreements with developers to contribute towards training programmes and employment support and employment access schemes".

Community Safety

5.6 Community safety is a significant issue for all groups and this highlights the importance of living in inclusive communities for their quality of life.

5.7 The main risks associated with the differential impacts identified include:

- Marginalisation - if communities are not designed to be inclusive.
- Reduced opportunities for social contact, for older and disabled people in particular, as a result of lack of appropriate local services, or the means of accessing those services and facilities.
- Discrimination from lack of ready access to essential community infrastructure such as that for health care.

- Build up of focused areas of disadvantage from the concentration of particular types of housing, e.g. Social rented, resulting in reduced interaction between different sectors of the community.
- Limited social interaction with an associated negative impact upon community cohesion as a consequence of people not feeling safe within their local area.

5.8 These risks have been addressed in the Staffordshire Moorlands Local Plan by:

1. **Spatial Objective SO6:** To maintain and promote sustainable regenerated rural areas and communities with access to employment opportunities, housing and services for all. **Spatial Objective SO10:** To deliver sustainable, inclusive, healthy and safe communities.
2. **Policy SS1 'Development Principles'** includes an expectation from the Council that "the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands in terms of delivering, in partnership with other agencies and services ... a healthy, safe, attractive and well-maintained environment".
3. **Policy C1 'Creating Sustainable Communities':** the Council will support proposals which protect, retain or enhance existing community facilities and only permit new development where the utility, transport and community infrastructure necessary to serve it is either available, or will be made available by the time it is needed. Development proposals will also be required to incorporate design features and layouts that will help to reduce crime and the fear of crime and support inclusive communities.
4. **Policy H1 'New Housing Development':** Housing proposals of 10 dwellings or more will be required to provide a mix of housing in terms of size, type and tenure on the site. The final mix will be negotiated with the developer based on housing needs as informed by the Strategic Housing Market Assessment and other relevant factors such as available supply and market demand.
5. **Policy DC1 'Design Considerations'** requires all new development (amongst other things) to: be well designed and reinforce local distinctiveness by positively contributing to and complementing the special character and heritage of the area and incorporate "designing out crime" initiatives, as well as ensuring, where appropriate, equality of access and use for all sections of the community.

Access to Facilities

5.9 Ensuring appropriate levels of community infrastructure, including facilities for health and recreation, that are well located and readily accessible is a significant issue for all groups.

5.10 The main risks associated with the differential impacts identified include:

- Increased anti-social behaviour amongst younger members of the community without accessible facilities for sport and recreation and other "things to do".

- Discrimination in terms of physical access to buildings for disabled people. All public buildings including retail development needs to be accessible to wheelchair users and those with poor mobility.
- Isolation of rural communities and elderly residents though requirement for increased reliance on use of a private car, if essential services and facilities are not accessible by walking, cycling or by public transport.

5.11 These risks have been addressed in the Staffordshire Moorlands Local Plan by:

1. **Policy SS1 Development Principles** expects development to contribute positively to the social, economic and environmental improvement of the District in partnership with other agencies and services. All proposals for development will be considered in the context of the District-wide spatial strategy. Significant positive effects include the likelihood of improvements to the social and environmental quality of the neighbourhood and improved access to jobs, services and facilities.
2. **Policy SS15 Planning Obligations and Community Infrastructure Levy** provides clarity regarding the Council's approach to developer contributions. The policy could enable the provision of new, or the significant enhancement of existing, community facilities and services and this is likely to make a positive contribution towards community cohesion and the quality of where people work and live.
3. **Policy E1 New Employment Development** will ensure that there is a choice of sustainably located employment sites, attractive to developers and operators and appropriate to market needs.
4. **Policy C1 Creating Sustainable Communities** supports proposals which protect, retain or enhance existing community facilities in towns and villages and includes measures to resist proposals that involve the loss of local facilities. There is a requirement to incorporate the infrastructure required as a result of any scheme or to make provision for financial contributions.
5. **Policy C2 Sport, Recreation and Open Space** provides continued protection from development for existing areas identified for recreational land and buildings including school playing fields and amenity space and supports the provision of new sport, recreation and open space facilities.
6. **Policy DC1 'Design Considerations'** requires all new development to be well designed, ensuring equality of access and use for everyone.
7. **Policy T1 Development and Sustainable Transport** supports development which reduces reliance on the private car for journeys, reduces the need to travel generally and helps to deliver more sustainable settlement patterns.

Assessment of Submission Version Local Plan (published in February 2018)

5.12 Following the screening assessment, it can be concluded that the policy amendments made to produce the Submission Version Local Plan (February 2018) are not considered to create any negative equality impacts. In fact in some cases additional positive benefits have been identified.

5.13 Regarding **the visions for the Staffordshire Moorlands, Leek, Biddulph, Cheadle and the Rural Areas**, insertion of references to sport, physical activity, active travel and consequent improvements to health and well-being increases the positive aspects of this policy for all equality groups as it helps to address health inequalities.

5.14 Policy DC1 - A notable positive change to the Local Plan is the requirement for the addition of high speed broadband infrastructure to new homes and businesses as this increases the positive aspects of this policy for all equality groups in particular as it allows for access to high speed broadband enabling easier access to services online as well as making working from home easier.

5.15 Policy T2 - Broadening the scope of part 5 of the policy to support access routes to public transport particularly increases the positive aspects of this policy for all equality groups as they tend to be more dependent on public transport.

Equalities Impact Assessment of pre-hearing Minor Modifications to Submission Version Local Plan (published in June 2018)

5.16 Following the screening assessment, it can be concluded that the minor modifications proposed to the Submission Version Local Plan (February 2018) are not considered to create any negative equality impacts.

Equalities Impact Assessment of post-hearing Main and Additional Modifications to Submission Version Local Plan (published in September 2019)

5.17 Following the screening assessment, it can be concluded that the majority of the main and additional modifications proposed to the Submission Version Local Plan have no impacts for equality groups. In a number of cases amendments to wording create additional positive benefits.

5.18 However, three possible negative equality impacts have been identified from the main modifications (detailed below) all of which have arisen in response to the need to be compliant with national planning policy. In these circumstances the Council is unable to avoid these amendments in order to achieve a sound plan.

Positive Impacts for Equality Groups

5.19 Some of the policy wording amendments are likely to have a positive impact for protected characteristic groups as follows:

- **New housing** - Potential positive - more contributions towards self build / custom build need by lowering the threshold - could assist with those needing specially adapted properties. Affordable housing is a key issue for protected groups so inclusion of monitoring wording to ensure expected levels are being reached is positive. Strengthening of wording relating to higher density development being more accessible to public transport is positive. Also there are potential positive equality benefits of safeguarding land for future housing development beyond the plan period. Biddulph is so constrained by the Green Belt that if housing (including affordable housing) is needed in the future safeguarding is a positive mechanism to use to help to achieve this.
- Minor equality benefits in requiring sites for **gypsies, travellers and travelling show people** to be soft landscaped in that positively enhancing the environment is more attractive for residents.

- **Community facilities** - Equality benefits from additional wording requiring an alternative facility to be of the same quality that meets the needs of community (as well as the same type) before a facility can be lost. Also the addition of 'or shared' in the context of options for continued use of a community facility is beneficial. Both policy amendments represent an additional test any applicant would have to consider in the context of losing a facility thereby ensuring that all alternatives are explored before facilities are lost.
- **Open space** - Making policy wording clearer allows for improvements to open space / sports and recreational facilities through qualifying new development where needed and would benefit equality groups.
- **Affordable housing** - Equality benefits of falling town affordable housing threshold (from 15 units to 10 units) is likely to result in the provision of more affordable housing as most of the housing in the Moorlands is to be provided in the towns in line with the spatial strategy. This outcome is consistent with the needs and issues raised by representatives of the protected groups. Similarly, the addition of wording to the rural exceptions site policy where market housing to facilitate more affordable housing to benefit the community may be allowed is a positive for the protected groups. Also, affordable housing being tenure blind is a benefit to the protected groups as those residing in affordable homes would be less likely to be singled out in any way.

Negative Impacts for Equality Groups

Three policy wording amendments have been identified as having a possible negative impact on protected groups as follows:

New housing - Possible negative impact of introduction of threshold (of 10 dwellings) for flexible accommodation rather than applying to all dwellings. However, this is in response to the latest Government policy rather than a local decision.

Affordable housing - The rise in the threshold for provision of new affordable housing in villages as a result of new development (from 5 units to 10 units) is likely to have some negative benefits in terms of groups being able to access affordable housing in rural areas especially as most new developments in the villages are less than 10 dwellings so would not attract any affordable housing. This amendment is also in response to the latest Government policy.

Gypsies, travellers and travelling show people - The use of Green Belt land by the gypsy and traveller communities is a national issue. It could be argued that these groups are disadvantaged by national Green Belt policy reflected in the Local Plan.

Assessment of Content of Inspector's Report (integrated into Adopted Local Plan)

Following the screening assessment, it can be concluded that the Inspector's new Main Modifications (i.e. only those which have not been assessed at previous stages) and the content of the Council's latest version of the Additional Modifications Schedule proposed for integration into the Adopted Local Plan have no significant positive or negative impacts for equality groups.

Assessment Tables

6 Assessment Tables

6.1 The table below sets out the needs and issues identified by the protected groups from research conducted by the Council and the relationship of these issues to the Local Plan. This table also records whether a health impact is likely.

Protected Group	Nature of Consultation	Needs / Issues raised	Links with Spatial Planning	Planning Policy - mitigation	Health Impact?
Race (including Gypsies & Travellers, Mixed Ethnic groups, Asian, Black and White Ethnic Groups)	Council commissioned research - 'Respecting All: the experiences of five protected characteristic groups under the equality duty' November 2016	The lack of secure and suitable accommodation is one of the principle inequalities that impact on Traveller's lives and that lack of accommodation has a profound effect on other aspects of their lives such as access to employment, education and health services.	Provision of land and / or appropriate policy for traveller site(s).	Policy H5 covers Gypsy and Traveller Sites and Sites for Travelling Showpeople	Y
Religion (including Christian, Muslim, Buddhist and Hindu)	Council commissioned research - 'Respecting All: the experiences of	Local communities perceived to be insular and not welcoming.	Design of development - creation of cohesive and balanced communities.	Policy DC1 covering design considerations and Policy C1 covering the creation of sustainable communities through support for new facilities and resistance to the loss of existing facilities.	Y
			Design of development - creation of cohesive and balanced communities. Access to community centres and facilities.	Policy C1 covering the creation of sustainable communities through support for new facilities and resistance to the loss of existing facilities.	Y

Protected Group	Nature of Consultation	Needs / Issues raised	Links with Spatial Planning	Planning Policy - mitigation	Health Impact?
	five protected characteristic groups under the equality duty' November 2016	Fear of harassment / hate crime	Design of development - creation of cohesive and balanced communities.	Policy DC1 covering design considerations and Policy C1 covering the creation of sustainable communities through support for new facilities and resistance to the loss of existing facilities.	Y
Disability	Council commissioned research - 'Respecting All: the experiences of five protected characteristic groups under the equality duty' November 2016	Access ⁽¹⁾ to public transport to take part in community life, live independently and seek employment.	Liaison with partners over transport investment priorities and improving public transport linked to new developments	Policy T1 promotes and supports development which reduces reliance on the private car for travel journeys and Policy T2 where the Council will encourage and support measures which promote better accessibility. Policy SS3 supports the provision of employment land.	N
		Lack of suitable housing stock	Design of new developments to incorporate access standards	Policy DC1 'Design Considerations' requires new development to ensure, where appropriate, equality of access and use for all sections of the Community. Policy H1 'New Housing Development' incorporates housing for all.	Y
		Where their home is located is important due	The spatial strategy focuses new	Policy SS3 'Future Provision and Distribution of Development' distributes	Y

Protected Group	Nature of Consultation	Needs / Issues raised	Links with Spatial Planning	Planning Policy - mitigation	Health Impact?
		to the value they get from being close to friends and family and being part of the community	development in the towns and larger villages.	development between the towns and rural areas.	
		Concern about being victims of crime	Design of new developments to promote overlooking and active street frontages	Policy DC1 'Design Considerations' requires new development to create, where appropriate, attractive, functional, accessible and safe public and private environments including 'designing out crime' initiatives and the principles of active design.	Y
		Concern about traffic - heavy, streets used as 'rat runs', poor crossing facilities, vehicles parking on pavements (especially in Leek)	Reducing reliance on private car for travel journeys	Policy T1 promotes and supports development which reduces reliance on the private car for travel journeys. Policy T2 encourages and supports measures which promote better accessibility, create safer roads, reduce the impact of traffic, or facilitate highway improvements.	Y
Sexual Orientation	Council commissioned research - 'Respecting All: the experiences of five protected	Young people have a preference to live in urban areas where it is perceived that there will be an established LGB community.	A majority of new development is focused within the towns.	Policy SS3 'Future Provision and Distribution of Development' focuses a majority of new development in the towns.	N

Protected Group	Nature of Consultation	Needs / Issues raised	Links with Spatial Planning	Planning Policy - mitigation	Health Impact?
	characteristic groups under the equality duty' November 2016	Fear of harassment / hate crime	Design of development - creation of cohesive and balanced communities.	Policy DC1 covering design considerations and Policy C1 covering the creation of sustainable communities through support for new facilities and resistance to the loss of existing facilities.	Y
Gender Reassignment	Council commissioned research - 'Respecting All: the experiences of five protected characteristic groups under the equality duty' November 2016	Fear of harassment / hate crime	Design of development - creation of cohesive and balanced communities.	Policy DC1 covering design considerations and Policy C1 covering the creation of sustainable communities through support for new facilities and resistance to the loss of existing facilities.	Y
Older People (who make up over a quarter of the Staffordshire Moorlands population)	Council commissioned research - 'Respecting All: the experiences of five protected	Lack of employment opportunities for those living in the Staffordshire Moorlands	Provision of land for employment	Policy SS14 'Northern Gateway Opportunity Site' promotes employment generating uses on the site. Policy E2 allocates new employment land in the District.	Y
		Lack of suitable accommodation for older	Provision of land for housing including extra care facilities	Policy H1 includes reference to older people and people with specialist housing	Y

Protected Group	Nature of Consultation	Needs / Issues raised	Links with Spatial Planning	Planning Policy - mitigation	Health Impact?
	characteristic groups under the equality duty' November 2016 & Help the Aged 2007 & Older Persons Forum (30/11/07)	people who need more support i.e. extra care Integrated accessible transport Access to essential services e.g. shops, GPs, post offices More smaller affordable homes needed in villages	Liaison with partners over transport investment priorities and improving public transport linked to new developments Location of new developments close to existing facilities Provision of land / policy measures to increase the supply of smaller affordable homes	needs. Policies SS6, SS7 and SS8 also includes references. Policy T1 ensures that major new development is located in areas that are accessible by sustainable travel modes or can be made accessible as part of the proposal. Policy T2 encourages and supports measures which promote better accessibility of transport links. Policy SS1 requires easy access to jobs, shops and transport services by all sections of the Community. Policy SS3 distributes development across the District including villages.Policy SS10 proposes to meet housing needs in villages by increasing the range of available and affordable house types in larger villages. Policy SS11 proposes to enable new housing development which meets a need, including affordable housing in smaller villages.	N Y Y
Younger People (who make up around a fifth of the	Findings from school pupils workshop (31/10/ 07)	More community facilities for older children	Protection of existing facilities and open space and provision of new recreation opportunities	Policy C1 supports proposals which protect, retain or enhance existing community facilities (including multi use and shared schemes) or provide new	Y

Protected Group	Nature of Consultation	Needs / Issues raised	Links with Spatial Planning	Planning Policy - mitigation	Health Impact?
Staffordshire Moorlands population)	& Youth Service (2007)			facilities. Policy C2 promotes the provision of high quality recreational open space by implementing and supporting schemes that will protect and improve the quantity, quality and accessibility of open space and outdoor sports, leisure and children's play facilities throughout the District.	
		New development needs to be well related to public transport	Liaison with partners over transport investment priorities and improving public transport linked to new developments	Policy T1 ensures that major new development is located in areas that are accessible by sustainable travel modes or can be made accessible as part of the proposal.	N
Gender (49.2% of the Staffordshire Moorlands population is male and 50.8% is female)	Staffordshire Moorlands Locality Profile, published by Staffordshire County Council in October 2016	Health - access to medical facilities	Location of new developments close to existing facilities	Policy SS1 requires quality local services, including provision for education, healthcare, leisure, community, cultural and tourist facilities in response to anticipated population change and visitor numbers.	Y

Protected Group	Nature of Consultation	Needs / Issues raised	Links with Spatial Planning	Planning Policy - mitigation	Health Impact?
Poverty (especially Biddulph East and Leek North)	Staffordshire Moorlands Locality Profile, published by Staffordshire County Council in October 2016	Access to employment opportunities	Provision of land for employment, particularly in areas of most need.	Policy SS3 to ensure that sufficient land, appropriately located, is made available for businesses.	Y
		Access to affordable housing options	Provision of land for housing, including affordable homes.	Policy H3 to maximise opportunities for delivery of affordable homes.	Y
		Access to community facilities including health services	Location of new developments close to existing facilities, including health services.	Area strategies (Policies SS6 - SS12 inclusive) to implement the spatial strategy, guiding development to where local services are available and the need for travel is minimised.	Y
Issues raised by people in all equality groups	Council commissioned research - 'Respecting All: the experiences of five protected characteristic groups under the equality duty' November 2016	For those people living in Staffordshire Moorlands there was a sense that employment opportunities were centred more in Stoke-on-Trent and this in itself created barriers in terms of travel and also access to employment support and advice. Reference was made to the job centre in the town having closed down and that there had at one time been a 'peripatetic job centre bus.'	Provision of land for employment	Policy SS3 details future distribution of employment development in the Staffordshire Moorlands. More specifically, Policy SS14 'Northern Gateway Opportunity Site' promotes employment generating uses on this site.	N

Protected Group	Nature of Consultation	Needs / Issues raised	Links with Spatial Planning	Planning Policy - mitigation	Health Impact?
		Access to affordable housing including private rental fees.	Provision of land / policy measures to increase the supply of affordable homes	Policy H1 requires provision of a mix of housing sizes, types and tenure including a proportion of affordable housing. Policy H2 lists the proposed housing allocations in Leek, Biddulph, Cheadle and the rural areas.	Y

Table 6.1 Needs and Issues Identified by Protected Groups and the relationship to the Local Plan

1. Access in the planning policy context is the accessibility of a site to services and facilities NOT access to buildings e.g. By wheelchair - this is covered separately in Building Regulations

6.2 The needs and issues raised by representatives of protected groups - set out in the table above - have been grouped and summarised into a number of key themes as follows. In order to address the key equality impacts identified, the Local Plan should:

1. **Housing** - Deliver future housing according to the diversity of local needs, including new homes that are affordable and adaptable as well as extra care housing where needed.
2. **Employment** - Provide access to employment opportunities, from all sectors of the economy and located close to where people live.
3. **Community Safety** - Deliver safe and inclusive communities.
4. **Access to Facilities** - Ensure appropriate levels of community infrastructure, including facilities for health and recreation, that are well located and readily accessible.

6.3 These key equality themes have been used as criteria to assess the potential impact of the policies and objectives in the emerging Staffordshire Moorlands Local Plan. The results of the assessment are set out in the table below.

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Spatial Vision for Staffordshire Moorlands	Positive for all equality groups	<p>All residents will benefit from the spatial vision; of particular relevance to the key equality themes are:</p> <ul style="list-style-type: none"> ● Emphasis on the promotion of sustainable communities with access to suitable housing and facilities and services; ● Maintenance of the District's economy with a more flexible and pro-active approach to employment development and raising skills and opportunities; ● Meeting specific needs of younger and older people; ● Improving the diversity and quality of the District's natural and historic assets; and ● Improved town centres - welcoming, safe and appealing, quality and range of shops, services and facilities. <p>No references to health or the Green Infrastructure Strategy. These would be beneficial due to ageing population and childhood obesity problem.</p>
Vision for Leek	Positive for all equality groups	<p>All residents will benefit from the vision for Leek, of particular relevance to the key equality themes are:</p> <ul style="list-style-type: none"> ● Leek's role as an increasingly important civic and service centre for its population; ● Improvement of diversity of employment opportunities, facilities and services; and ● Regeneration of underused areas providing new development opportunities. <p>No references to open space or the Green Infrastructure Strategy both of which could help to improve health and more specifically the childhood obesity problem in parts of the town.</p>

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Vision for Biddulph	Positive for all equality groups	<p>All residents will benefit from the vision for Biddulph, of particular relevance to the key equality themes are:</p> <ul style="list-style-type: none"> ● Biddulph's role as a significant service centre for its residents; ● Reducing levels of deprivation in Biddulph East; ● Improved town centre environment; ● Expanded local economy; and ● A greater variety of housing types and tenures. <p>No references to open space or the Green Infrastructure Strategy both of which could help to improve health and more specifically the childhood obesity problem in parts of the town.</p>
Vision for Cheadle	Positive for all equality groups	<p>All residents will benefit from the vision for Cheadle, of particular relevance to the key equality themes are:</p> <ul style="list-style-type: none"> ● Cheadle will become a more sustainable settlement, better able to meet its own needs, enhancing and enlarging its role as a significant service centre for the local population; ● a focus on growth in housing and employment provision with significant complementary investment in the town's social and physical infrastructure; ● Improved town centre environment; ● Expanded local economy; and ● Improved local public and sustainable transport links.

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
		<p>No references to open space or the Green Infrastructure Strategy both of which could help to improve health and more specifically the childhood obesity problem in parts of the town.</p>
Vision for Rural Areas	Positive for all equality groups	<p>All residents will benefit from the vision for the rural areas, of particular relevance to the key equality themes are:</p> <ul style="list-style-type: none"> ● Larger villages to be the rural centres for services, facilities and jobs acting to sustain the rural areas; ● Smaller village communities to have a range of affordable housing opportunities to meet local needs and improved access to community services; ● Diverse local economy to provide a range of job opportunities and support agriculture; and ● Protection of District's heritage and landscape character. <p>No references to open space or the Green Infrastructure Strategy both of which could help to improve health and more specifically the childhood obesity problem in some rural wards.</p>
Aims & Objectives	Positive for all equality groups	<p>All residents will benefit from Strategic Aims and Objectives, of particular relevance to the key equality themes are:</p> <ul style="list-style-type: none"> ● SA2 (meeting the needs of our communities) and SA3 (encouraging a strong, prosperous and diverse economy); ● Most of the Objectives relate in some way to the key equality themes (SO3, SO4, SO5, SO6, SO7, SO10 and SO11).

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Development Approach	Positive for all equality groups	Most of development to take place in larger settlements which will help to support their services and facilities. Also allows for development around the District including development in smaller settlements to meet local needs.
Policy SS1 Development Principles	Positive for all equality groups	<p>This policy expects the development and use of land to contribute positively to the social, economic and environmental improvement of the Staffordshire Moorlands. Of particular relevance to the key equality themes are references to:</p> <ul style="list-style-type: none"> ● A mix of house types and tenures of quality affordable homes; ● Quality local services; ● Easy access to jobs, services and facilities for all sections of the community; ● Increased economic prosperity; ● Healthy and safe environment; and ● Sustainable location of development.
Policy SS2 Presumption in Favour of Sustainable Development	Positive for all equality groups	This policy reflects the presumption in favour of sustainable development set out in national planning policy. Of particular relevance to the key equality themes are that 'development that improves the economic, social and environmental conditions in the area' will be approved.
Policy SS3 Future Provision and Distribution of Development	Positive for Young, Older, and those with disabilities. No differential impacts for other equalities groups.	The policy provides a framework to manage the scale of development within the plan area. New development is proposed to be distributed widely across the District.

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Policy SS4 Strategic Housing Development	Potential Negative Impact Identified	<p>The policy provides for at least 6080 dwellings over the period 2012 to 2031 at an overall average annual development rate of 320 dwellings. A potentially negative impact on delivering future housing according to local needs.</p> <p>The February 2017 update to the Strategic Housing Market Assessment (SHMA) has recommended a range for the District's objectively assessed need of between 235 to 330 new dwellings per year over the plan period. This policy may not fully address the problem of affordable housing need.</p>
Policy SS5 Towns	No differential impacts identified	<p>This policy (along with Policies SS9-SS12 inclusive) identifies the settlement hierarchy and applies the development rates set out in Policy SS3.</p>
Policy SS6 Leek Area Strategy	Positive for all equality groups	<p>The policy seeks to consolidate the growth of Leek by (amongst other things):</p> <ul style="list-style-type: none"> ● meeting the town's housing and community needs (making specific reference to increasing the range of available and affordable house types, especially for first time buyers and older people; and increasing and improving the provision of educational, health and community facilities and enabling further shared use of facilities.), and ● creating employment growth and increasing the diversity of employment opportunities to meet existing and future needs. <p>There are no references to reducing levels of deprivation in Leek North. There are no specific references to delivering safe and inclusive communities or helping to tackle the childhood obesity problem (e.g. Through implementation of the Green Infrastructure Strategy).</p>

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
<p>Policy SS7 Biddulph Area Strategy</p>	<p>Positive for all equality groups</p>	<p>The policy seeks to enhance the role of Biddulph by (amongst other things):</p> <ul style="list-style-type: none"> ● increasing the range of available and affordable house types, (including starter homes) especially for first time buyers, families and older people; including extra care housing; ● Requiring sites within the urban area to be in locations across the town which have good accessibility to services and facilities with encouragement being given to previously developed (brownfield) sites; ● supporting the retention and growth of existing businesses within the town and providing opportunities for new enterprises and businesses by promoting further development; ● increasing the provision of educational, health and community facilities including a new school and new food store and improving public transport connections to the town centre. Also, protecting, increasing and improving the provision and accessibility of open space, sport and recreational facilities. <p>There are no specific references to delivering safe and inclusive communities or helping to tackle the childhood obesity problem (e.g. Through implementation of the Green Infrastructure Strategy).</p>
<p>Policy SS8 Cheadle Area Strategy</p>	<p>Positive for all equality groups</p>	<p>The policy seeks to expand the role of Cheadle by (amongst other things):</p> <ul style="list-style-type: none"> ● increasing the range of available and affordable house types and higher market housing, especially for first time buyers and families; ● supporting the retention and growth of JCB and other existing businesses within the town and improving and intensifying the use of existing employment areas at New Haden/Brookhouses; ● providing additional educational, health and community facilities, including a new primary school to serve north Cheadle;

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
<p>Policy SS9 Rural Areas</p>	<p>Positive for all equality groups</p>	<ul style="list-style-type: none"> ● protecting, increasing and improving the provision and accessibility of open space, sport and recreational facilities; ● improving pedestrian and cycle links across the town and into the countryside and improving public transport links between the town and other main settlements. <p>There are no references to the housing needs of older people in Cheadle when baseline information shows that Cheadle South East has a high proportion of lone pensioner households and the population growth of the District will be skewed towards older people by 2025.</p> <p>There are no specific references to delivering safe and inclusive communities or helping to tackle the childhood obesity problem (e.g. Through implementation of the Green Infrastructure Strategy).</p> <ol style="list-style-type: none"> 1. Housing - Deliver future housing according to the diversity of local needs, including new homes that are affordable and adaptable as well as extra care housing where needed. 2. Employment - Provide access to employment opportunities, from all sectors of the economy and located close to where people live. 3. Community Safety - Deliver safe and inclusive communities. 4. Access to Facilities - Ensure appropriate levels of community infrastructure, including facilities for health and recreation, that are well located and readily accessible. <p>There are specific references to helping to tackle the childhood obesity problem.</p>

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
<p>Policy SS10 Larger Villages Area Strategy</p>	<p>Positive for all equality groups</p>	<p>Policy lists villages categorised as 'larger villages' in the hierarchy and seeks to retain and enhance their roles as rural service centres. They are intended to provide for the bulk of the local housing needs of the rural areas and also for limited employment needs. This would have a positive impact on the key equality theme of delivering future housing according to the diversity of local needs, providing access to employment opportunities, from all sectors of the economy and located close to where people live and ensuring appropriate levels of community infrastructure.</p>
<p>Policy SS11 Smaller Villages Area Strategy</p>	<p>Positive for all equality groups</p>	<p>Policy lists villages categorised as 'smaller villages' in the hierarchy and seeks to protect and enable services and facilities which are essential to sustain rural living including housing which meets a need (including affordable housing) and small scale employment development/ diversification. This would have a positive impact on the key equality theme of delivering future housing according to the diversity of local needs, providing access to employment opportunities, from all sectors of the economy and located close to where people live and ensuring appropriate levels of community infrastructure.</p>
<p>Policy SS12 Other Rural Areas Strategy</p>	<p>Positive for all equality groups</p>	<p>Policy seeks to restrict new development in the open countryside. It allows for meeting local housing needs, local community facility needs and sustaining the rural economy, supports the enhancement and conservation of the countryside and identifies major developed areas for regeneration. Positives - essential need rural housing, rural economy, community facilities, limiting high travel uses not well served by public transport, uses on major developed sites e.g. Extra care on anizio.</p>
<p>Policy SS13 Churnet Valley Strategy</p>	<p>Positive for all equality groups</p>	<p>Policy identifies the Churnet Valley for sustainable tourism and rural regeneration. It seeks to facilitate more visitors to the area, through supporting increased visitor accommodation and attractions as well as enhancing and protecting the landscape character and heritage</p>

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
<p>Policy SS14 Northern Gateway Opportunity Site</p>	<p>Positive for all equality groups</p>	<p>assets of the area. The policy also supports measures to improve connectivity and accessibility to and within the Churnet Valley by sustainable transport. This would have a positive impact on the key equality theme of employment - increased activity in the tourism industry is likely to lead to an increased number and type of jobs created in rural parts of the District (e.g. part time and full time work). If connectivity is improved to and within the Churnet Valley, this would have a positive impact on the 'access to facilities' theme. The wider community would also share these positive impacts (NB the policy emphasises that any development should be of an appropriate scale with high design standards to enhance the heritage, landscape and biodiversity of the area).</p> <p>Policy identifies a large site at Blythe Bridge for a mixed use development scheme, with the principle use being for employment and employment generating uses and also the possibility of some residential development. This would have a positive impact on the key equality theme of access to employment opportunities and is likely to have a positive impact (subject to further detail) on the access to facilities theme and the delivery of future housing theme. Development of this area with a focus on economic uses will also have a positive impact on the wider community.</p> <p>There are no references to the Green Infrastructure Strategy (with its links to health benefits and helping to tackle the obesity problem).</p>
<p>Policy SS15 Planning Obligations and Community Infrastructure Levy</p>	<p>No differential impacts identified</p>	<p>Policy provides guidance on developer contributions. No differential impacts were identified.</p>

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Policy SD1 Sustainable Use of Resources	Positive in particular for those on low incomes	Policy relates to strategies for mitigation and adaption to climate change. Improvements to energy efficiency will benefit everyone, but in particular there will be a positive impact for those on low incomes.
Policy SD2 Renewable/Low-Carbon Energy	No differential impacts identified	Policy relates to the consideration of renewable or low-carbon energy schemes. No differential impacts were identified.
Policy SD3 Sustainability Measures in Development	Positive in particular for those on low incomes	Policy relates to sustainability measures in new development. Improvements to energy efficiency in new developments will benefit everyone, but in particular there will be a positive impact for those on low incomes.
Policy SD4 Pollution	No differential impacts identified	Policy seeks to protect people and the environment from unsafe, unhealthy and polluted environments. Will help to deliver safe and inclusive communities.
Policy SD5 Flood Risk	No differential impacts identified	Policy seeks to manage flood risk. This should benefit all residents.
Policy E1	Positive for all equality groups	Policy seeks to deliver new business and industrial developments in sustainable locations that contribute towards the creation and retention of a wide range of jobs and training opportunities. This makes a positive contribution to addressing the key equality theme of

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
New Employment Development		providing access to local employment opportunities. Reference is made to the Council seeking agreements for contributions to employment support and employment access schemes which may have a particularly positive impact for young people, disabled people, women and those on low incomes.
Policy E2 Employment Allocations	Positive for all equality groups	Policy identifies new land to allocate for economic purposes, enabling the development of future business and industrial premises. Land is identified in each of the 3 main towns, Leek, Cheadle and Biddulph. The policy makes a positive contribution to addressing the key equality theme of providing access to local employment opportunities.
Policy E3 Existing Employment Areas	No differential impacts identified	Policy controls the circumstances under which the change of use of employment to non-employment uses will be permitted. This should benefit all residents.
Policy E4 Tourism & Cultural Development	No differential impacts identified	Policy seeks to control the location of new tourist developments in the Staffordshire Moorlands together with any impacts on the District's landscape, biodiversity and heritage. No differential impacts were identified.
Policy E5 Rural Economy	No differential impacts identified	Policy seeks to ensure that new development in the open countryside and in the Green Belt will be carefully controlled. Reference is made to prioritising the re-use of rural buildings for commercial enterprise.

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Policy H1 New Housing Development	Positive for all equality groups	<p>Policy seeks to ensure that new housing development meets the identified housing needs of the local population. It makes reference to building a mix of housing sizes, types and tenure including affordable housing / starter homes and housing for special groups e.g. older people. It also refers to self-build housing plots. The policy also stipulates that all new dwellings should aim to provide flexible accommodation which is capable of future adaptation. Any housing sites not allocated in the Local Plan are required to have reasonable access by foot, cycle or public transport to existing services and community facilities. This has positive impacts on both the 'housing' and 'access to facilities' key equality themes as well as the community as a whole.</p> <p>The policy wording could be made clearer to show that disabled people including wheelchair users will be catered for.</p>
Policy H2 Housing Allocations	Positive for all equality groups	Policy identifies suitable sites to meet the District's housing target set out in Policy SS3. This policy will have a positive impact on the key equality theme of 'housing' in particular delivering housing according to local needs.
Policy H3 Affordable Housing	Positive for all equality groups	Policy seeks to maximise the delivery of affordable housing in the District. This policy will have a positive impact on the key equality theme of 'housing' in particular delivering housing according to local needs as well as to the community as a whole.
Policy H4 Rural Housing	Positive for all equality groups	Policy enables affordable housing on rural sites that would not normally be released for housing development as well as housing for essential local needs, replacement dwellings, extensions, conversions and limited infilling. This will have a positive impact on the key equality theme of delivering future housing according to the diversity of local needs.

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
<p>Policy H5 Gypsy & Traveller Sites and Sites for Travelling Show People</p>	<p>Positive for minority ethnic groups</p>	<p>The Council proposes to make provision for gypsies, travellers and travelling show people to be accommodated where evidence demonstrates a requirement. The list of criteria for selection of sites includes accessibility to community facilities. This will have positive impacts on the key equality theme of delivering safe and inclusive communities.</p>
<p>Policy TCR1 Development in the Town Centres</p>	<p>Positive for all equality groups</p>	<p>Policy seeks to protect and enhance the vitality and viability of the three town centres in the District by allowing appropriate retail, leisure, culture and business development. The policy refers to ensuring good access to the town centres by those using public transport, cycling or walking (key equality theme 'access to facilities'). The policy also reflects the importance of good design by committing to setting out design principles to improve and enhance the distinctive heritage of the town centres including minimising the risk of crime (to be implemented through the Council's forthcoming Design Guide SPD) which relates to key equality theme of delivering safe and inclusive communities.</p> <p>The policy wording could be made clearer to show that disabled people including wheelchair users will taken into consideration in the design of spaces in town centres.</p>
<p>Policy TCR2 Primary Shopping Frontages</p>	<p>No differential impacts identified</p>	<p>Policy identifies town centre boundaries and core retail frontages in each of the 3 towns that should be maintained to support the vitality and viability of the town centres. No differential impacts were identified.</p>
<p>Policy TCR3 Retailing and other Town Centre uses Outside Town Centres</p>	<p>Positive for all equality groups</p>	<p>Policy limits out of town centre development of town centre uses and ensures that the impact of larger schemes is assessed as part of the planning application process to protect the vitality and viability of town centres. Focusing retail development in town centres rather than sporadically makes access easier for all members of the community (key</p>

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Policy DC1 Design Considerations	Positive for all equality groups	equality theme 'access to facilities'). The policy states that where development in the town centre is not possible sites outside Leek, Biddulph and Cheadle in highly accessible locations that are well connected to the town centre will be considered. Policy seeks to ensure that all development is well designed and contributes positively to a sense of place. Reference is made to creation of safe public and private environments in accordance with 'designing out crime' initiatives and the principles of active design. Reference is also made to ensuring equality of access and use for all sections of the community.
Policy DC2 The Historic Environment	No differential impacts identified	Policy seeks to safeguard and enhance the built and historic environment and ensure that developments contribute positively to its character. Will help to deliver well-being and a good quality of life through contributing to a high quality built environment. This should benefit all residents.
Policy DC3 Landscape & Settlement Setting	No differential impacts identified	Policy seeks to protect and enhance the landscape character of the Plan Area and the setting of settlements. Will help to deliver well-being and a good quality of life through contributing to a high quality natural environment. This should benefit all residents.
Policy DC4 Local Green Space	Positive for all equality groups	The policy seeks to identify and protect Local Green Space of value to the local community from inappropriate development. Positive impacts in relation to health and well being for all members of the community.

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
<p>Policy C1 Creating Sustainable Communities</p>	<p>Positive for all equality groups</p>	<p>This policy seeks to support proposals which protect, retain or enhance existing community facilities or provide new ones as well as resisting proposals including the loss of community facilities (subject to criteria). It also requires the timely provision of new infrastructure to support new developments and allows for the relocation of uses which are not compatible with their surroundings in terms of negative amenity. Of particular relevance to the equality themes, the policy expresses a preference for new facilities to be located within defined built up areas where they are most accessible. The policy also requires development proposals to incorporate high quality locally distinctive design features and layouts that will reduce crime and the fear of crime and support inclusive communities, particularly in terms of accessibility and functionality in line with the Council's Design SPD (key equality theme of delivering safe and inclusive communities).</p>
<p>Policy C2 Sport, Recreation and Open Space</p>	<p>Positive for all equality groups particularly younger people</p>	<p>This policy seeks to protect and enhance existing open spaces, sport and recreational buildings and land including playing fields in order to ensure their continued contribution to the health and well-being of local communities. This will have positive impacts on the key equality themes of ensuring good access to a range of community facilities, including for health and recreation and of delivering safe and inclusive communities.</p>
<p>Policy C3 Green Infrastructure</p>	<p>Positive for all equality groups</p>	<p>Policy sets out, through partnership working to develop, protect and enhance the networks of Biodiversity and Green Infrastructure. Will help to ensure opportunities for the key equality theme of access to facilities (including health), benefiting all residents.</p>
<p>Policy NE1 Biodiversity & Geological Resources</p>	<p>No differential impacts identified</p>	<p>Policy seeks to conserve and enhance biodiversity and geological resources of the plan area. This may have a positive impact on well-being and quality of life through contributing to a high quality natural environment. This should benefit all residents.</p>

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Policy T1 Development & Sustainable Transport	Positive for all equality groups	The policy seeks to manage development such that the need to travel is minimised. Policy refers to ensuring that major development is located in areas that are accessible by sustainable travel modes or can be made accessible as part of the proposal and requires travel plans for major schemes. This will have positive impacts for the key equality theme relating to access to facilities as well as for members of the community as a whole.
Policy T2 Other Sustainable Transport Measures	Positive for all equality groups	This policy encourages and supports measures which promote better accessibility, create safer roads, reduce the impact of traffic, or facilitate highway improvements. Of particular relevance, the policy supports physical improvements to public transport links and safeguards all existing disused railway lines, supporting their re-use for recreational purposes. The policy also refers to the Council working with its partners to promote the improvement/expansion of existing bus services and the provision of innovative sustainable transport services in the District, particularly those serving rural areas. Additionally, the policy supports and promotes the development of a network of safe walking, horse riding and cycling routes (including the National Cycle Network), connecting to transport interchanges, linking communities and recreational/tourist areas. This will have positive impacts for the key equality theme relating to access to facilities as well as for members of the community as a whole.

Table 6.2 Assessment of Equality Impacts

Recommendations

- 6.4** The following recommendations are made for improving the policies proposed for inclusion in the Local Plan preferred options July 2017.
- 1. Spatial Vision** - Make a reference to health and the Green Infrastructure Strategy. These would be beneficial due to ageing population and childhood obesity problem.
 - 2. Vision for Leek** - Make a reference to open space and the Green Infrastructure Strategy both of which could help to improve health and more specifically the childhood obesity problem in parts of the town.

3. **Vision for Biddulph** - Make a reference to open space and the Green Infrastructure Strategy both of which could help to improve health and more specifically the childhood obesity problem in parts of the town.
4. **Vision for Cheadle** - Make a reference to open space and the Green Infrastructure Strategy both of which could help to improve health and more specifically the childhood obesity problem in parts of the town.
5. **Vision for Rural Areas** - Make a reference to open space and the Green Infrastructure Strategy both of which could help to improve health and more specifically the childhood obesity problem in some rural wards.
6. **Policy SS4 'Strategic Housing Development'** - Ensure that housing requirement is set to address objectively assessed need.
7. **Policy SS6 'Leek Area Strategy'** - Include a reference to reducing levels of deprivation in Leek North, delivering safe and inclusive communities and helping to tackle the childhood obesity problem (e.g. Through implementation of the Green Infrastructure Strategy).
8. **Policy SS7 'Biddulph Area Strategy'** - Make reference to delivering safe and inclusive communities and helping to tackle the childhood obesity problem (e.g. Through implementation of the Green Infrastructure Strategy).
9. **Policy SS8 'Cheadle Area Strategy'** - Include reference to the housing needs of older people in Cheadle to reflect baseline information. Include reference to delivering safe and inclusive communities and helping to tackle the childhood obesity problem (e.g. Through implementation of the Green Infrastructure Strategy).
10. **Policy SS14 'Northern Gateway Opportunity Site'** - Include reference to the Green Infrastructure Strategy (with its links to health benefits and helping to tackle the obesity problem) within this policy or the relevant site specific policy.
11. **Policy H1 'New Housing Development'** - The policy wording could be made clearer to show that disabled people including wheelchair users will be catered for.
12. **Policy TCR1 'Development in the Town Centres'** - The policy wording could be made clearer to show that disabled people including wheelchair users will taken into consideration in the design of spaces in town centres.

Screening of Staffordshire Moorlands Local Plan Submission Version
February 2018

7 Screening of Staffordshire Moorlands Local Plan Submission Version February 2018

Consultation on Equalities Impact Assessment of Preferred Options Local Plan

7.1 Following the Equalities Impact Assessment of the Preferred Options Local Plan, the recommendations made (refer to paragraph 6.4 of this document) were incorporated into the plan prior to the public consultation. The Equalities Impact Assessment of the Preferred Options Local Plan was published in July 2017 as a separate document alongside the Preferred Options Local Plan for consultation. The consultation period commenced on Monday 31st July 2017 and ended at 5pm on Friday 22nd September 2017.

7.2 Consultation arrangements included:

- Over 4,000 emails and 8,000 postcards sent to consultees on the Staffordshire Moorlands Consultation Database.
- A dedicated webpage on the Staffordshire Moorlands website.
- Promotion of the Local Plan consultation and drop in sessions through social media.
- Press notices and releases in local papers.
- Postcards delivered to all residents within SMDC – 48,000 and all businesses in SMDC – 3,000.
- Site notice at each proposed site allocation within the Local Plan.
- Consultation material available in key public locations.

7.3 No responses to the Equalities Impact Assessment of the Preferred Options Local Plan were received.

Equalities Impact Assessment of Submission Version Local Plan (published in February 2018)

7.4 The table below shows the amendments made to the Local Plan policies as a result of consultation as well as the latest evidence. These amendments have all been subject to an equalities impact screening to determine any likely significant effects and consequently any further changes needed to the plan to address any negative equality impacts.

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
<p>Visions</p>	<ul style="list-style-type: none"> ● Add the following text to the end of 4th paragraph: <u>The implementation of a Playing Pitch and Built Facilities Strategy will seek to provide and enhance formal sports facilities (indoor and outdoor).</u> (Sport England) ● Amend the 5th paragraph to read: The needs of all sectors... " could helpfully be amended to read "through provision of recreational, <u>sport</u> and community facilities". (Sport England) ● Add sentence to end of 5th paragraph: <u>Encouragement of physical activity and active travel throughout the District and across all age groups will improve health and wellbeing.</u> ● Add '<u>sport</u>' into the visions for Leek, Biddulph, Cheadle and the Rural Areas. (Sport England) ● Add '<u>whilst providing recreational opportunities and improvements to health and wellbeing</u>' into the visions for Leek, Biddulph, Cheadle and the Rural Areas. ● Add additional wording to the end of paragraph 4: 'The wealth of biological and geological resources will continue to be protected, conserved and enhanced where appropriate and net gains and improvements to biodiversity will be made.' <p>Make reference to heritage within all the visions.</p>	<p>No</p> <p>(insertion of references to sport, physical activity, active travel and consequent improvements to health and well-being increases the positive aspects of this policy for all equality groups as it helps to address health inequalities).</p>
<p>Aims and objectives</p>	<p>Agree to amend SO7 as follows: 'To support protect, provide and enhance the tourism, cultural, sport and recreation.....' (Sport England)</p>	<p>No</p>
<p>SS1 - Development Principles</p>	<ul style="list-style-type: none"> ● Amend text to include specific reference to the Peak District National Park in recognition of its significance for the District. ● Amend bullet point to refer to refer to creating opportunities to support activity and health through good design. 	<p>No</p>
<p>SS1a - Presumption in Favour of Sustainable Development</p>	<p>No changes proposed.</p>	<p>No</p>
<p>SS2 - Settlement Hierarchy</p>	<p>No changes proposed.</p>	<p>No</p>

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
SS3 - Future Provision and Distribution of Development	Amend text to confirm that the development requirements are expressed as a minimum.	No
SS4 - Strategic Housing & Employment Land Supply	<ul style="list-style-type: none"> ● Update the 'New Allocations' figures for Leek/Biddulph/ Rural Areas to reflect new housing capacity at: <ol style="list-style-type: none"> 1. The Mount Leek (DSL2) 2. Land north of Macclesfield Road, Leek (LE102) 3. Tunstall Rd Biddulph (DSB3) 4. Land at corner of Brookfield Avenue / Stoney Lane, Endon (EN128) ● Amend SS4 text to clarify that the housing requirements given for Neighbourhood Plan areas do not always necessitate the allocation of development sites. Instead, particularly where the housing requirement is low, general conformity with the strategic policies of the Local Plan could be demonstrated through the provision of policies in the Neighbourhood Plan that would facilitate the provision of the housing requirement through windfall. ● Amend policy to clarify that neighbourhood plan requirements are net figures and provide additional information in respect of employment land provision within neighbourhood areas as requested. ● Include reference in the supporting text to the Blythe Vale employment allocation being in additional to the District's requirement (Stafford BC) ● Add residual employment land requirements table, as per residual housing requirements table 	No
SS5 - Leek Area Strategy	Point 4, bullet 4 - include reference to active design as requested (Sport England)	No

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
	<ul style="list-style-type: none"> Make specific reference to heritage assets in point 4 (Historic England) Amend Part 2 bullet (3) to “<i>Supporting the development of the employment site allocations (as identified on the Leek and Leekbrook Policies Maps)</i>” in response to Wainhomes rep querying why Leekbrook is categorised as a smaller village. 	
SS6 - Biddulph Area Strategy	<ul style="list-style-type: none"> Point 4, bullet 4 - include reference to active design as requested (Sport England) Make specific reference to heritage assets in point 4 (Historic England) 	No
SS7 - Cheadle Area Strategy	<ul style="list-style-type: none"> Amend typographical error - Reference to Policy SDC2 should be deleted and replaced by Policy DSC3 Make specific reference to historic environment and heritage assets Make specific reference to historic environment and heritage assets 	No
SS8 - Larger Villages Strategy	<ul style="list-style-type: none"> Make specific reference to historic environment and heritage assets 	No
SS9 - Smaller Villages Strategy	<ul style="list-style-type: none"> Make specific reference to historic environment and heritage assets SS9 (bullet 2) text to be amended to clarify that development does not have to meet a specific identified “need”. 	No
SS10 – Other Rural Areas Strategy	<ul style="list-style-type: none"> Amend policy to refer to need for proposals to have regard to the canal and conservation (Canal and Rivers Trust) Amend Part 1 bullet to: “Allowing rural exceptions housing (in accordance with Policies H1 and H3)” – consequential amendment to reflect affordable housing policy. The term ‘Local Need’ will be removed from Part 1 bullet point 5 to be consistent with other changes to this policy where this term has been removed. The revised bullet point would read: “<i>Allowing community facilities where that need cannot be met in a settlement within the hierarchy. In such cases the development should be in a sustainable location close to an existing serviced settlement.</i>” (Rushton Parish Council) Insert H1 part 5 d) regarding extensions in the rural area. 	No
SS11 - Churnet Valley Strategy	<ul style="list-style-type: none"> With reference to heritage assets, re-word first sentence beginning “any development should be...” to provide clarity of intention. (Historic England) 	No

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
SS12 - Planning Obligations & CIL	No changes proposed	No
SD1 - Sustainable Use of Resources	<p>With agreement from Natural England, adding a bullet which:</p> <ul style="list-style-type: none"> ● states that areas of lower quality agricultural land should be used for development in preference to Best Most Versatile agric land ● states that development should also aim to minimise “soil disturbance” and to retain ecological connectivity as far as possible 	No
SD2 - Renewable / Low-Carbon Energy	No changes proposed	No
SD3 - Sustainability Measures in Development	No changes proposed	No
SD4 - Pollution	<p>Following feedback from EA, UU, STW + LLFA, policy expanded to:</p> <ul style="list-style-type: none"> ● title references “water quality” not just pollution ● require developers to have regard to the actions and objectives of all relevant Catchment Flood Management Plans in striving to protect and improve the quality of relevant water bodies [i.e. the <u>Water Framework Directive</u>] ● require development within <u>Groundwater Source Protection Zones (SPZs)</u> to demonstrate how site layout has sought to mitigate potential pollution to public water supply. A quantitative and qualitative risk assessment and groundwater protection mitigation strategy may be required. 	No
SD5 - Flood Risk	<p>Following feedback from EA, UU, STW +LLFA, policy substantially amended (expanded) to:</p> <ul style="list-style-type: none"> ● require for any site, the developer to demonstrate how the site layout locates the most vulnerable parts of the development in the areas of lowest flood risk 	No

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
	<ul style="list-style-type: none"> Where a watercourse is present on a development site, applicants will be expected to take opportunities to <u>undertake river restoration</u> and enhance natural river corridors (WFD); and the Council will encourage and promote implementation of natural flood risk management measures The culverting of any watercourse will not normally be permitted, and development should wherever possible <u>remove any existing culverts</u> In all cases applicants to demonstrate how their proposals manage surface water run-off sustainably (according to hierarchy). Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes On larger sites involving phased development and/or involving multiple landowners the Council will encourage coordinated, holistic drainage strategies across the whole site over time In all cases the Council will work with developers stakeholders and landowners to encourage and promote implementation of natural flood management measures which will contribute to flood risk reduction 	
E1 - New Employment Development	<ul style="list-style-type: none"> Existing reference to giving priority to commercial re-use of rural buildings over residential use, to be removed, to more closely align with NPPF; but retain support for commercial conversion Amendment to clarify that policy in relation to new development outside development boundaries, means new-build development (i.e. as building conversions have separate reference in policy) 	No
E2 - Employment Allocations	<p>Following Wainhomes rep etc:</p> <ul style="list-style-type: none"> Employment allocation LEEK EM2 to also be included in table 8.1 'Leek (including Leekbrook)' Also identify proposed mixed use allocation Waterhouses WA004 by inserting new table 8.4 for rural areas, and make consequential amendments to policy text 	No

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
	<ul style="list-style-type: none"> ● Clarification of WA004 employment area site size in table 8.4 ● Amend WA004 site description to "land at Waterhouses Enterprise Centre" ● Be consistent throughout policy in identifying sites as 'mixed use' <p>Amend the size of the employment part of BD117 from 4.74 to 4.99 to reflect larger site size.</p>	
E3 - Existing Employment Areas, Premises and Allocations	No changes proposed	No
E4 - Tourism and Cultural Development	<p>Policy significantly re-written to:</p> <ul style="list-style-type: none"> ● Remove requirement to demonstrate tourism need, or benefits to economy ● Put "cultural" development on the same par with tourist development ● Removal of limitation for new-build tourism to be conversions only 	No
H1 - New Housing	<ul style="list-style-type: none"> ● Part 3a) Add reference to the SHMA or successor document (Agent/s) ● Part 3a) Remove reference that it should 'meet a genuine and proven housing need and demand'. (SCC and Agent) ● Part 3d) Add that this will determined on case-by-case basis (Agent/s) ● Part 4b) Add 'and character' (DM Meeting) ● Part 4b) Amend 'add' to 'extend' (DM Meeting) ● Part 4c) Delete bullet 1 as this is covered elsewhere in Plan (Agent) ● Part 4c) Delete bullet 2 – as above (Internal change) ● Part 4c) Move bullet 3 regarding Green Belt to the end of the Policy (Agent/s) ● Part 5d) Extensions – moved to Policy SS10 (DM Meeting) ● Part 5e) Conversions – remove 'non-residential' (Agent/s) ● Part 5f) Addition of 'previously developed land' bullet (Agent/s) ● Part 5g) Addition of 'subdivision' bullet (Agent/s) 	No

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
	<ul style="list-style-type: none"> Policy H1 to be amended to provide in principle support for the sub-division of rural dwellings provided they are not in isolated locations. (Gez Willard) Move reference to Green Belt to end of Policy (Agent/s) Refer to 'green/active travel' (Sport England) 	
H2 - Housing Allocations	<ul style="list-style-type: none"> In the case of allocations comprised of multiple SHLAA sites, add housing capacity for each SHLAA site. Policy DSB1 row in table to list "BDNEW" site, and also specify that the area on the east of the bypass (BD104, BD016) is also included in allocation Update the 'The number of dwellings' column figures for Leek/Biddulph/ Rural Areas tables to reflect new housing capacity at: <p>The Mount Leek (DSL2) [increase in LE140 &LE128 yields]</p> <p>Land north of Macclesfield Road, Leek (LE102)</p> <p>Tunstall Rd Biddulph (DSB3)</p> <p>Land at corner of Brookfield Avenue / Stoney Lane, Endon (EN128).</p> <ul style="list-style-type: none"> Amend WA004 site description in rural table to "land at Waterhouses Enterprise Centre" Amend Werrington site policy in rural table to 'DSR 4' (not DSR 2) 	No
H3 - Affordable Housing	No amendments proposed	No
H4 - Gypsy and Traveller Sites and Sites for Travelling Showpeople	<p>Following reps by NFGLG and Historic England, amend policy:</p> <ul style="list-style-type: none"> Remove "in order to meet the identified needs of the District" from first para, because the criteria would be used to assess applications irrespective of whether "need" has been identified (to accord with PPTS); 	No

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
	<ul style="list-style-type: none"> Split the bullet for natural- and heritage considerations into two, as the NPPF tests are different: the word “significantly” added to natural bullet to explain that natural value must not be “<u>significantly</u> harmed”; and a new bullet for heritage explaining that heritage harm would need to be justified against NPPF policy 	
TCR1 - Development in the Town Centres	No amendments proposed	No
TCR2 - Primary Shopping Frontages	No amendments proposed	No
TCR3 - Retailing and other town centre uses outside town centres	No amendments proposed	No
DC1 - Design Considerations	<ul style="list-style-type: none"> Point 3 – Replace ‘Active Design’ with capital letters as it is the name of a specific piece of guidance. (Sport England) Amend Point 3 to read ‘create attractive, active, functional :...’ (Sport England) Amend Point 5 to read ‘creation of healthy active environments’. (Sport England) Add ‘height’ into part 2 of the policy (Historic England) New bullet 11 – (New residential and commercial development should) “<i>be served by high speed broadband (>30mbps) unless it can be demonstrated through consultation with Next Generation Access Network providers that this would not be possible, practical or economically viable. In all circumstances during construction of the site sufficient and suitable ducting should be provided within the site and to the property to facilitate ease of installation at a future date.</i>” (Staffordshire County Council) 	<p>No</p> <p>(Requirement for the addition of high speed broadband infrastructure to new homes and businesses increases the positive aspects of this policy for all equality groups in particular as it allows for access to high speed broadband enabling easier</p>

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
<p>DC2 - The Historic Environment</p>	<p>All the amendments below made to address comments from Historic England:</p> <ul style="list-style-type: none"> ● Delete first paragraph and replace with the following wording: <i>“The Council will conserve and where possible enhance heritage assets in a manner appropriate to their significance. This will take into account the desirability of maintaining and enhancing their significance and will ensure that development proposals contribute positively to the character of the built and historic environment.”</i> ● Include new second paragraph to read: <i>“Particular protection will be given to designated heritage assets and their settings using NPPF policy”</i>. ● Include a new third paragraph to read: <i>“Applications directly or indirectly affecting non-designated heritage assets will be informed by the scale of any harm or loss and the significance of the heritage asset.”</i> ● Include a re-written fourth paragraph to read: <i>“All applications affecting designated heritage assets and applications likely to lead to significant harm on non-designated heritage assets will require the submission of a heritage statement. Where development affects archaeology, both designated and undesignated, the Council requires reference to the Historic Environment Record and (as appropriate) desk based assessment, field surveys and trench evaluation by a qualified professional.”</i> ● Include a new fifth paragraph to read: <i>“Where the loss of significance is unavoidable, recording should take place and this should be added to the Historic Environment Record, held by Staffordshire County Council.”</i> 	<p>access to services online as well as making working from home easier).</p> <p>No</p>

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
	<ul style="list-style-type: none"> ● Include a new sixth paragraph to read:” Development proposals which would result in the reuse of buildings at risk in line with NPPF policy will be welcomed by the Council. ● Number the paragraphs to the policy for easy reference (for consistency and ease of use) 	
DC3 - Landscape & Settlement Setting	<ul style="list-style-type: none"> ● New bullet 4 “Supporting identification and implementation of natural flood management measures that will contribute towards delivering a reduction in local and catchment-wide flood risk and impacts of climate change and other multiple benefits”. (Environment Agency) <p>(NB existing bullet 4 retained - becomes 5; and 5 becomes 6).</p>	No
DC4 - Local Green Space	No amendments proposed	No
C1 - Community Facilities	Add bullet which supports proposals encouraging use of electrical battery powered vehicles. (Resident/Agent)	No
C2 - Sport, Recreation and Open Space	<ul style="list-style-type: none"> ● Reference Indoor Sports. (Sport England) ● Reference updated Open Space Study, Playing Pitch Strategy and Indoor Sports Facility Assessment. (Sport England) ● Take out reference to minimum standards (Sport England) ● Add part 1c) to reflect wording of NPPF i.e. any loss of provision would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. (Sport England) ● Part 3 add reference to the ‘ creation of artificial grass pitches’. (Sport England) ● Part 3 add ‘do not have an unacceptable impact on existing neighbours’. (Sport England) ● Add sentence to state that ‘The Council will encourage securing community access to schools to maximise the use of existing sports provision outside of the school day and the co-location of community infrastructure wherever possible.’ (Sport England) 	No
C3 - Green Infrastructure	No amendments proposed	No
NE1 - Biodiversity & Geological Resources	Natural England rep suggested amended 5th bullet to more closely align with NPPF. Following internal discussion of Natural England wording, and taking on board all comments, 1 st para. and 5 th bullet amended as follows:	No

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
<p>Biodiversity and Geological Resources</p> <p><i>The biodiversity and geological resources of the District and neighbouring areas will be conserved and enhanced by positive management and strict control of development (and having regard to Council <u>relevant ecological evidence</u>) by:</i></p> <ul style="list-style-type: none"> 5. <i>Ensuring all development seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative. Where any mitigation and compensation measures are required, they should be appropriately scheduled and managed according to the nature, size and scale of the development so as to minimise impacts that may disturb protected or important habitats and species.</i> And other consequential amendments to policy <p>The above amendments:</p> <ul style="list-style-type: none"> remove reference to geodiversity gain; amend 'Council evidence' to 'evidence' makes allowance for scheme scale (ie might be impractical to expect biodiversity gain/mitigation/compensation in very small schemes) use of 'appropriate', 'suitable' as caveats the last sentence responds to the issue of whether on-site compensation should be planted first, and to prevent its damage during development. 		
<p>NE2 - Trees, Woodlands & Hedgerows</p>	<p>Following internal comments; Policy to be amended:</p>	<p>No</p>

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
	<ul style="list-style-type: none"> ● Changing the protection of “mature” trees, to “healthy” ones, as young trees should be protected too ● Replacement of 2:1 tree replacement concept with a more generalised “increase canopy cover” requirement ● Insertion of “<i>Where it is not possible to secure this new or replacement tree planting within the site, the Council will work with applicants to ascertain if a suitable site(s) can be found off-site for replacement planting in the locality</i>” regarding replacement of lost tree cover. 	
T1 - Development and Sustainable Transport	<p>Following SCC Highways response:</p> <ul style="list-style-type: none"> ● Reference to “Local Transport Plan” changed to “Integrated Transport Strategy” in 1st para ● Add new bullet under development requirements to reference contributions for junction improvements, traffic management and highway infrastructure ● Under part (4) facilitating walking and cycling, additional text that applicants should also consider how their schemes can enhance the existing path network in line with the <u>Staffordshire County Council Rights of Way Improvement Plan</u> and also give consideration to the protection of <u>non-definitive</u> public footpath routes, not just definitive routes. <p>[SCC also request reference to “school transport provision” under development reqts for public transport]</p>	No
T2 - Other Sustainable Transport Measures	<p>Following SCC Highways response:</p> <ul style="list-style-type: none"> ● Reference to “Local Transport Plan” removed ● Part 1 (new road schemes) removed [as it promotes unidentified new roads and strategic infrastructure improvements that are not supported by evidence and hence are not required to deliver the Local Plan] 	No (Broadening the scope of part 5 of the policy to support

Policy	Change Proposed	Equalities Impact Screening - Likely Significant Negative Effects?
	<ul style="list-style-type: none"> to broaden scope of Part (5) support for access routes 'to 'public transport' rather than just interchanges. 	<p>access routes to public transport particularly increases the positive aspects of this policy for all equality groups as they tend to be more dependent on public transport).</p>

Table 7.1 Equalities Screening of Submission Version Local Plan

Policy NE2 - Trees, Woodland and Hedgerows

7.5 This policy was a late addition to the Preferred Options Local Plan so was not originally assessed. The table below contains an assessment of the policy as worded in the Preferred Options Local Plan (2017). The table above shows an assessment of the changes made to the policy in the Submission Version Local Plan (2018).

Local Plan Reference	Nature of Likely Impact	Summary of Equality Impact
Policy NE2 Trees, Woodland and Hedgerows	No differential impacts identified	Policy seeks to protect existing trees, woodland and hedgerows from loss or deterioration. This may have a positive impact on well-being and quality of life through contributing to a high quality natural environment. This should benefit all residents.

Table 7.2

Conclusion

7.6 Following the screening assessment, it can be concluded that the policy amendments made to produce the Submission Version Local Plan (February 2018) are not considered to create any negative equality impacts. In fact in some cases additional positive benefits have been identified.

7.7 Regarding **the visions for the Staffordshire Moorlands, Leek, Biddulph, Cheadle and the Rural Areas**, insertion of references to sport, physical activity, active travel and consequent improvements to health and well-being increases the positive aspects of this policy for all equality groups as it helps to address health inequalities.

7.8 Policy DC1 - A notable positive change to the Local Plan is the requirement for the addition of high speed broadband infrastructure to new homes and businesses as this increases the positive aspects of this policy for all equality groups in particular as it allows for access to high speed broadband enabling easier access to services online as well as making working from home easier.

7.9 Policy T2 - Broadening the scope of part 5 of the policy to support access routes to public transport particularly increases the positive aspects of this policy for all equality groups as they tend to be more dependent on public transport.

Screening of Staffordshire Moorlands Local Plan Submission Version
pre-hearing Minor Modifications June 2018

8 Screening of Staffordshire Moorlands Local Plan Submission Version pre-hearing Minor Modifications June 2018

Equalities Impact Assessment of Submission Version Local Plan Minor Modifications (published in June 2018)

8.1 The Submission Version Local Plan was published and made available for receipt of formal representations over the period 27th February to 11th April 2018. In total 559 representations (including 8 late representations) were received from 200 respondents. Having considered the representations and latest evidence, the Council considers that the Local Plan is a sound document and that no significant changes are appropriate or necessary.

8.2 However, in order to improve the legibility of the Local Plan and update its content a number of additional modifications have been suggested for recommendation to the Inspector. Following approval of these minor, additional modifications alongside the Local Plan and its supporting documentation at Council Assembly on 13th June 2018, these documents will be submitted to the Secretary of State for consideration by the Inspector appointed to conduct the examination.

8.3 The list of additional policy modifications has been reviewed as part of the ongoing Equality Impact Assessment process.

8.4 There are 5 policy modifications proposed, all of which relate to very minor points of clarification which it is considered would have no negative effect on any equality groups:

- SS1a - correct policy numbering;
- SD3 - deletion of the word "micro";
- H1 - clarification of SHMA or successor document;
- NE1 - update reference from "European" to "International" sites, to take account of any future Ramsar sites;
- DSB1 - addition of the words "where applicable".

Conclusion

8.5 Following the screening assessment, it can be concluded that the minor modifications proposed to the Submission Version Local Plan (February 2018) are not considered to create any negative equality impacts.

Screening of Staffordshire Moorlands Local Plan Submission Version
post-hearing main and additional modifications September 2019

9 Screening of Staffordshire Moorlands Local Plan Submission Version post-hearing main and additional modifications September 2019

9.1 The table below shows modifications made to the Local Plan policies as a result of the hearings process. There are two types of modifications made to the plan at this stage - 'main modifications' are those affecting the meaning of the content of the plan and 'additional (i.e. minor) modifications' cover instances such as typographical errors and factual updates.

9.2 Few additional modifications have been included in the equality screening table below as most clearly would have no impact on the equality groups. All the main modifications and relevant additional modifications have been subject to an equality impact screening to determine any likely significant effects and consequently any further changes needed to address any negative equality impacts. Note that the 'likely significant positive/negative effects' column reflects the modifications proposed at this stage only. Any previous negative effects in relation to the policy wording were considered as part of previous screenings in 2018.

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
Visions	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
Aims & Objectives	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS1 Development Principles	<p>Amendment to bullet 1 as follows:</p> <ul style="list-style-type: none"> A mix of types and tenures of quality, affordable homes, including starter homes, to meet the needs and aspirations of the existing and future communities. (technical amendment to reflect the latest affordable housing definition) 	<ul style="list-style-type: none"> No
SS1a - Presumption in favour of Sustainable Development	<ul style="list-style-type: none"> Delete Policy (repetition of national policy) 	<ul style="list-style-type: none"> No
SS2 - Settlement Hierarchy	<ul style="list-style-type: none"> Under the heading 'Rural Area Smaller Villages' – add the wording "<u>Where relevant, green belt policy will also apply.</u>" Under the heading 'Other Rural Areas' – add the underlined wording: "<u>this comprises of the open countryside where development is normally unacceptable and green belt where further development is generally inappropriate</u>". (both points of clarity in relation to national Green Belt policy) 	<ul style="list-style-type: none"> No
SS3 - Future Provision and Distribution of Development	<ul style="list-style-type: none"> Minor amendments to clarify the wording. 	<ul style="list-style-type: none"> No

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
	<ul style="list-style-type: none"> Changing the plan period dates from 2012-2031 to 2014 -2033. Consequential changes to wording to reflect new base date for housing and employment land. 	
SS4 - Strategic Housing and Employment Land Supply	<ul style="list-style-type: none"> Updates to housing and employment land figures to reflect amended plan period, deletion of a housing site (BDNEW) and increased housing capacity at Wharf Road and Tunstall Road in Biddulph. Clarification that net housing requirements for Neighbourhood Plans are expressed as a minimum. Additional wording to reference publication of a Housing Implementation Strategy. Point of clarification in relation to monitoring. 	<ul style="list-style-type: none"> No
SS5 - Leek Area Strategy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS6 - Biddulph Area Strategy	<p>Amendment of Part 1 bullet 1 as follows:</p> <ul style="list-style-type: none"> Increasing the range of available and affordable house types, (including starter homes) especially for first time buyers, families and older people, including extra 	<ul style="list-style-type: none"> Potential positive equality benefits of safeguarding land for future housing development beyond the plan period. Biddulph is so constrained by the Green Belt that if housing is needed in the future safeguarding is a positive

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
	<ul style="list-style-type: none"> care housing. (Clarification to reflect latest affordable housing definition). New Part 6 to policy - inclusion of safeguarded land at Gillow Heath between the urban area and the Green Belt to meet Biddulph's longer term development needs. The land is not allocated for development at the present time. Planning permission for its development will only be granted following a Local Plan Review. 	<ul style="list-style-type: none"> mechanism to use to help to achieve this.
SS7 - Cheadle Area Strategy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS8 - Larger Villages Strategy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS9 - Smaller Villages Strategy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS10 - Other Rural Areas Strategy	<ul style="list-style-type: none"> Amendment made to policy wording to reflect Inspector's request for Bolton Copperworks and Anzio Camp to have their own new separate site policies. 	<ul style="list-style-type: none"> No
SS11 - Churnet Valley Strategy	<ul style="list-style-type: none"> Deletion of last sentence due to repetition: "Development shall be in accordance with the Churnet Valley Masterplan". 	<ul style="list-style-type: none"> No
SS12 - Planning Obligations and CIL	<ul style="list-style-type: none"> Addition of new wording for clarity: 	<ul style="list-style-type: none"> No

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
	<p>Planning obligations will only be sought where they meet all of the following tests:</p> <ul style="list-style-type: none"> a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. 	
SD1 - Sustainable use of Resources	<ul style="list-style-type: none"> • No changes proposed. 	<ul style="list-style-type: none"> • No
SD2 - Renewable / Low-Carbon Energy	<ul style="list-style-type: none"> • No changes proposed. 	<ul style="list-style-type: none"> • No
SD3 - Sustainability measures in Development	<ul style="list-style-type: none"> • Amendments to second sentence of bullet 1 for clarity to read: "In the case of larger developments such as housing estates the Council will support measures such as 'communal' micro-renewables, or District Heating installations". 	<ul style="list-style-type: none"> • No
SD4 - Pollution	<ul style="list-style-type: none"> • Minor grammatical correction only. Typo 'of' instead of 'for'. 	<ul style="list-style-type: none"> • No

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
SD5 - Flood Risk	<ul style="list-style-type: none"> Moving flood management policy wording from another policy to the Flood Risk policy for clarity; Technical additions to support natural flood management measures; Other minor points of clarification. 	<ul style="list-style-type: none"> No
E1 - New Employment Development	<ul style="list-style-type: none"> Minor technical / clarification points relating to deletion of unnecessary references and acknowledgement of wider policies. 	<ul style="list-style-type: none"> No
E2 - Employment Allocations	<ul style="list-style-type: none"> Mods relating to deletion of unnecessary references, an employment allocation (ADD09 at Leekbrook) and the adjustment of the site boundary of another employment allocation (Tunstall Road, Biddulph). 	<ul style="list-style-type: none"> No
E3 - Existing Employment Areas, Premises and Allocations	<ul style="list-style-type: none"> Technical amendments to wording for clarity. 	<ul style="list-style-type: none"> No
E4 - Tourism and Cultural Development	<ul style="list-style-type: none"> Technical amendments to wording for clarity. 	<ul style="list-style-type: none"> No
H1 - New Housing	<ul style="list-style-type: none"> Lowering of threshold for making a contribution towards self-build / custom-build need to 10 dwellings (rather than 15 dwellings). 	<ul style="list-style-type: none"> Potential positive - more contributions towards self build / custom build need by lowering the threshold - could assist with those needing specially adapted properties.

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
	<ul style="list-style-type: none"> • Addition of text regarding monitoring of windfalls and affordable housing to ensure that it is meeting expected levels. • Amendments to part 3b) (housing mix) to include: a size threshold (in addition to a dwellings threshold); to allow for viability or other circumstances; and to allow housing needs to be informed by a successor document to the SHMA. • Amendments to part 3c) to strengthen the wording in relation to high density developments being appropriate in locations which are more accessible by public transport. • Amendment to part 3d) to introduce a threshold of 10 dwellings (or 0.5ha) at which housing developments should aim to provide flexible accommodation capable of future adaptation to meet accessibility standards. Previously this covered all new dwellings. • Amendment to part 4c) to reword the impact of development on the countryside to provide more clarity. • Amendment to part 5d) - replacement of 'and' with 'or' in relation to rural building conversions to residential where the building is suitable and worthy for conversion or where such development 	<ul style="list-style-type: none"> • Affordable housing is a key issue for protected groups so inclusion of monitoring wording to ensure expected levels are being reached is positive. • Strengthening of wording relating to higher density development being more accessible to public transport is positive. • Possible negative impact of introduction of threshold (of 10 dwellings) for flexible accommodation rather than applying to all dwellings.

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
H2 - Housing Allocations	<p>would represent the optimal viable use of a heritage asset / enabling development.</p> <ul style="list-style-type: none"> Amendment of Biddulph housing figures to reflect deleted site BDNEW and increased masterplan capacity at Wharf Road / Tunstall Road. Amendment of other site figures as a consequence of an update to the housing figures to 31/03/2019 at the request of the Inspector. 	<ul style="list-style-type: none"> No
H3 - Affordable Housing	<ul style="list-style-type: none"> Amendment of part 1 wording to ensure consistency with the new NPPF resulting in the same thresholds for affordable housing in the towns and villages - consequently the village threshold has risen from 5 dwellings to 10 dwellings and the town threshold has fallen from 15 dwellings to 10 dwellings. Removal of the term 'starter homes' from part 2 to reflect latest affordable housing definition. Addition of the wording "residential schemes that are of an appropriate scale for the spatial strategy" to part 3 as opposed to "small schemes for 100% affordable housing" (in or on the edge of villages) for clarity. 	<ul style="list-style-type: none"> Equality benefits of falling town affordable housing threshold is likely to result in the provision of more affordable housing as most of the housing in the Moorlands is to be provided in the towns in line with the spatial strategy. This outcome is consistent with the needs and issues raised by representatives of the protected groups. The rise in the threshold in villages is likely to have some negative benefits in terms of groups being able to access affordable housing in rural areas especially as most new developments in the villages are less than 10 dwellings so would not attract any affordable housing.

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
	<ul style="list-style-type: none"> Additional wording to rural exceptions sites policy to be consistent with the Glossary and 2012 NPPF para 54. "small numbers of market homes may be allowed at the Council's discretion where it would facilitate the provision of significant additional affordable housing to meet the needs of the local community" Addition of text suggested by Inspector (part 4) "affordable housing should be designed as an integral part of developments and be 'tenure blind' in relation to other properties within the site" 	<ul style="list-style-type: none"> Addition of wording to rural exceptions site policy where market housing to facilitate more affordable housing to benefit the community may be allowed is a positive for the protected groups. Affordable housing being tenure blind is a benefit to the protected groups as those residing in affordable homes would be less likely to be singled out in any way.
<p>H4 - Gypsy and Traveller Sites and Sites for Travelling Show People</p>	<ul style="list-style-type: none"> Additional wording included in the policy to clarify the District's residual traveller pitch requirements for the plan period. Additional wording for clarity. Introduction of new wording to require sites to be 'soft' landscaped to positively enhance the environment and increase the site's openness rather than 'hard' landscaped. Clarification of wording to say that development of gypsy and traveller or travelling show people accommodation in the Green Belt will not be allowed unless there are very special circumstances in line with national policy. 	<ul style="list-style-type: none"> Minor equality benefits in requiring sites to be soft landscaped - positively enhancing the environment is more attractive for residents. The use of Green Belt land by the gypsy and traveller communities is a national issue. It could be argued that these groups are disadvantaged by national Green Belt policy.

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
TCR1 - Development in the Town Centres	<ul style="list-style-type: none"> Removal of unnecessary technical references. 	<ul style="list-style-type: none"> No
TCR2 - Primary Shopping Frontages	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
TCR3 - Retailing and other Town Centre uses outside Town Centres	<ul style="list-style-type: none"> Adjustment of wording to achieve clarity and consistency with national planning policy. New wording added - Retail proposals on sites "<i>outside town centres and not in accordance with an up-to-date Local Plan</i>" to make it clear when a sequential assessment will be required. 	<ul style="list-style-type: none"> No
DC1 - Design Considerations	<ul style="list-style-type: none"> Adjustment of wording to use a more neutral term to 'overbearing development'. This is amended to 'visual impact'. 	<ul style="list-style-type: none"> No
DC2 - The Historic Environment	<ul style="list-style-type: none"> New wording to emphasise the Council's pro-active approach to Buildings at Risk. 	<ul style="list-style-type: none"> No
DC3 - Landscape and Settlement Setting	<ul style="list-style-type: none"> Amendment of wording about impact of development on the character of the countryside to make it clearer; Use of more positive wording 'conserve' or 'enhance' biodiversity qualities rather than 'maintain'; 	<ul style="list-style-type: none"> No

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
	<ul style="list-style-type: none"> Re-location of wording to flood risk policy; and Adjustment of wording relating to Peak District National Park as the Local Plan does not cover land within it. 	
DC4 - Local Green Space	<ul style="list-style-type: none"> Adjustment of wording to reflect that development proposals within a Local Green Space will be assessed against national Green Belt policy as opposed to setting out specific criteria within this policy which may be inconsistent with national policy. 	<ul style="list-style-type: none"> No
C1 - Community Facilities	<ul style="list-style-type: none"> Removal of wording already covered in other plan policies. Re: criteria relating to loss of community facilities, addition of wording so that the first criteria reads: "an alternative facility of the same type <i>and quality that meets the needs of the community</i> is available in the locality or can be provided in an accessible location in the same locality". Addition of words "or shared" in the context of options for continued use of a community facility. 	<ul style="list-style-type: none"> Equality benefits from additional wording requiring an alternative facility to be of the same quality that meets the needs of community (as well as the same type) before a facility can be lost. Also the addition of 'or shared' in the context of options for continued use of a community facility is beneficial. Both policy amendments represent an additional test any applicant would have to consider in the context of losing a facility thereby ensuring that all alternatives are explored before facilities are lost.

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
C2 - Sport, Recreation and Open Space	<ul style="list-style-type: none"> • Amendments to the wording to provide clarity and consistency with national policy. • Inclusion of dwelling threshold to which policy applies within policy wording (10 dwellings / 0.5ha or more). Consequently, provision of or a contribution towards provision of open space, sports and recreation facilities would apply to all qualifying developments. Previously a threshold was not stated in the policy. 	<ul style="list-style-type: none"> • Making policy wording clearer allows for improvements to open space / sports and recreational facilities through qualifying new development where needed and would benefit equality groups.
C3 - Green Infrastructure	<ul style="list-style-type: none"> • No changes proposed. 	<ul style="list-style-type: none"> • No
NE1 - Biodiversity and Geological Resources	<ul style="list-style-type: none"> • Additional wording to clarify the requirement to have regard to the Council's ecological surveys following removal of this requirement from each site policy. • Minor amendment for clarity ('European' to 'International'). 	<ul style="list-style-type: none"> • No (text has just been moved to this policy from another policy so is not additional to the plan).
NE2 - Trees, Woodlands and Hedgerows	<ul style="list-style-type: none"> • No changes proposed. 	<ul style="list-style-type: none"> • No
T1 - Development and Sustainable Transport	<ul style="list-style-type: none"> • No changes proposed. 	<ul style="list-style-type: none"> • No

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive/Negative Effects?
T2 - Other Sustainable Transport Measures	<ul style="list-style-type: none"> Addition of text relating to supporting development proposals which encourage electrical battery powered vehicles which was previously included in Policy C1. 	<ul style="list-style-type: none"> No (text has just been moved to this policy from another policy so is not additional to the plan).

Table 9.1 Equality Screening of Post-Hearing Main and Additional Modifications

Conclusion

9.3 At this stage in the Local Plan production process, the types of amendments made are generally technical or points of clarification rather than major strategy changes. Consequently most are not considered to have a significant positive or negative effect on protected groups.

Positive Impacts for Equality Groups

9.4 A few of the policy wording amendments are likely to have a positive impact for protected characteristic groups as follows:

- **New housing** - Potential positive - more contributions towards self build / custom build need by lowering the threshold - could assist with those needing specially adapted properties. Affordable housing is a key issue for protected groups so inclusion of monitoring wording to ensure expected levels are being reached is positive. Strengthening of wording relating to higher density development being more accessible to public transport is positive. Also there are potential positive equality benefits of safeguarding land for future housing development beyond the plan period. Biddulph is so constrained by the Green Belt that if housing (including affordable housing) is needed in the future safeguarding is a positive mechanism to use to help to achieve this.
- Minor equality benefits in requiring sites for **gypsies, travellers and travelling show people** to be soft landscaped in that positively enhancing the environment is more attractive for residents.
- **Community facilities** - Equality benefits from additional wording requiring an alternative facility to be of the same quality that meets the needs of community (as well as the same type) before a facility can be lost. Also the addition of 'or shared' in the context of options for continued use of a community facility is beneficial. Both policy amendments represent an additional test any applicant would have to consider in the context of losing a facility thereby ensuring that all alternatives are explored before facilities are lost.
- **Open space** - Making policy wording clearer allows for improvements to open space / sports and recreational facilities through qualifying new development where needed and would benefit equality groups.
- **Affordable housing** - Equality benefits of falling town affordable housing threshold (from 15 units to 10 units) is likely to result in the provision of more affordable housing as most of the housing in the Moorlands is to be provided in the towns in line with the spatial strategy. This outcome is consistent with the needs and issues raised by representatives of the protected groups. Similarly, the addition of wording to the rural exceptions site policy where market housing to facilitate more affordable housing to benefit the community may be allowed is a positive for the protected groups. Also, affordable housing being tenure blind is a benefit to the protected groups as those residing in affordable homes would be less likely to be singled out in any way.

Negative Impacts for Equality Groups

Three policy wording amendments have been identified as having a possible negative impact on protected groups as follows:

New housing - Possible negative impact of introduction of threshold (of 10 dwellings) for flexible accommodation rather than applying to all dwellings. However, this is in response to the latest Government policy rather than a local decision.

Affordable housing - The rise in the threshold for provision of new affordable housing in villages as a result of new development (from 5 units to 10 units) is likely to have some negative benefits in terms of groups being able to access affordable housing in rural areas especially as most new developments in the villages are less than 10 dwellings so would not attract any affordable housing. This amendment is also in response to the latest Government policy.

Gypsies, travellers and travelling show people - The use of Green Belt land by the gypsy and traveller communities is a national issue. It could be argued that these groups are disadvantaged by national Green Belt policy reflected in the Local Plan.

Screening of Staffordshire Moorlands Local Plan with Changes
Recommended in Inspector's Report

10 Screening of Staffordshire Moorlands Local Plan with Changes Recommended in Inspector's Report

10.1 The table below shows new modifications made to the Submission Version Local Plan (February 2018) policies by the Inspector. These have all been incorporated into the adopted Local Plan. Please note that some modifications included on the Inspector's schedule have been suggested by the Council in previous iterations of the main modifications schedule as part of the examination process so have previously been assessed for impact on equalities. Only those modifications which have not previously been assessed are included in the table below.

10.2 There are two types of modifications made to the plan at this stage - 'main modifications' are those affecting the meaning of the content of the plan. These are made by the Inspector. Additional (i.e. minor) modifications cover instances such as typographical errors and factual updates. These are in a separate list produced by the Council.

10.3 No additional modifications have been included in the equality screening table below as relevant ones have previously been assessed. The new main modifications have been subject to an equality impact screening to determine any likely significant effects.

Policy	Change Proposed	Equality Impact Screening - Likely Significant Positive / Negative Effects?
Visions	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
Aims & Objectives	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS1 - Development Principles	<ul style="list-style-type: none"> No further amendments. 	<ul style="list-style-type: none"> No
SS1a - Presumption in Favour of Sustainable Development	<ul style="list-style-type: none"> To be deleted (as previously assessed) 	<ul style="list-style-type: none"> No
SS2 - Settlement Hierarchy	<ul style="list-style-type: none"> No further amendments. 	<ul style="list-style-type: none"> No
SS3 - Future Provision and Distribution of Development	<ul style="list-style-type: none"> Amendment of second paragraph to read: "The Council will review <u>monitor</u> the annual development rate <u>and manage supply</u> to ensure that future provision will continue to adequately meet identified needs and reflect development potential." 	<ul style="list-style-type: none"> No

SS4 - Strategic Housing and Employment Land Supply	<ul style="list-style-type: none"> Update to neighbourhood plan requirements to reflect new plan period and addition of two new Neighbourhood Planning Areas since policy originally written. 	<ul style="list-style-type: none"> No
SS5 - Leek Area Strategy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS6 - Biddulph Area Strategy	<ul style="list-style-type: none"> Minor grammatical corrections. NB - the new part 6 of the policy referred to in the previous screening of Sept 2019 post-hearing main and additional mods has not been included in the final version of the plan as the Inspector decided to omit it. 	<ul style="list-style-type: none"> No
SS7 - Cheadle Area Strategy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS8 - Larger Villages Area Strategy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS9 - Smaller Villages Area Strategy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SS10 - Other Rural Areas Strategy	<ul style="list-style-type: none"> Minor grammatical correction. 	<ul style="list-style-type: none"> No
SS11 - Churnet Valley Strategy	<ul style="list-style-type: none"> No further amendments. 	<ul style="list-style-type: none"> No
SS12 - Planning Obligations and Community Infrastructure Levy	<ul style="list-style-type: none"> Minor grammatical amendment. 	<ul style="list-style-type: none"> No
SD1 - Sustainable Use of Resources	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SD2 - Renewable / Low Carbon Energy	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
SD3 - Sustainability Measures in Development	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No

Equalities Impact Assessment of Staffordshire Moorlands Local Plan

SD4 - Pollution and Water Quality	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
SD5 - Flood Risk	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
E1 - New Employment Development	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
E2 - Employment Allocations	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
E3 - Existing Employment Areas, Premises and Allocations	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
E4 - Tourism and Cultural Development	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
H1 - New Housing Development	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
H2 - Housing Allocations	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
H3 - Affordable Housing	<ul style="list-style-type: none"> The removal of the reference to 'starter homes', referred to in the previous screening of Sept 2019 post-hearing main and additional mods has not been included in the final version of the plan as the Inspector decided it was not necessary after all. 	<ul style="list-style-type: none"> No
H4 - Gypsy and Traveller Sites and Sites for Travelling Showpeople	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
TCR1 - Development in the Town Centres	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
TCR2 - Primary Shopping Frontages	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
TCR3 - Retailing and other Town Centre uses outside Town Centres	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No

DC1 - Design Considerations	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
DC2 - The Historic Environment	<ul style="list-style-type: none"> Change of terminology from 'buildings at risk' to 'heritage assets at risk' to reflect national guidance. 	<ul style="list-style-type: none"> No
DC3 - Landscape and Settlement Setting	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
DC4 - Local Green Space	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
C1 - Creating Sustainable Communities	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
C2 - Sport, Recreation and Open Space	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
C3 - Green Infrastructure	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
NE1 - Biodiversity and Geological Resources	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No
NE2 - Trees, Woodland and Hedgerows	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
T1 - Development and Sustainable Transport	<ul style="list-style-type: none"> No changes proposed. 	<ul style="list-style-type: none"> No
T2 - Other Sustainable Transport Measures	<ul style="list-style-type: none"> No further changes proposed. 	<ul style="list-style-type: none"> No

Table 10.1 Equality Screening of Inspector's new Main Modifications to Local Plan

Conclusion

10.4 At this final stage in the Local Plan production process, the types of new amendments made to the policies above are generally technical or points of clarification rather than major strategy changes. There are hardly any new amendments which have not been previously assessed at this stage because of the way the examination process works, with previous versions of the modifications schedules having already been published. None of the new amendments listed above are considered to have any significant positive or negative effects on protected groups.

Findings of Initial EqIA

11 Findings of Initial EqIA

Findings of Initial EqIA

11.1 This standard Staffordshire Moorlands Pro-forma for an Initial Equality Impact Assessment records the appraisal undertaken of the emerging Staffordshire Moorlands Local Plan at its early issues and options stage.

Assessment Description

Title of policy, practice, service or function being assessed	Options for Site Allocations for the Staffordshire Moorlands Local Plan
Officers conducting assessment	Regeneration Officer (Planning Policy)
Start Date for Assessment	10th July 2014
Date of assessment	10th July 2014
Reason for Assessment	<p>The Staffordshire Moorlands Local Plan is a statutory Council document which will include local policies to determine planning applications and allocate sites for future development up to 2031. The Plan is at a very early stage of production and no development options have yet been published. It is at this time that the Sustainability Appraisal (SA) Scoping Report is being produced to set out a framework for assessing the sustainability of the plan. The impact on equality is also considered at this time. The assessment at this stage will help to inform how equalities can be taken into account as part of the Local Plan production process.</p> <p>Note that this assessment covers the site allocations part of the Local Plan only.</p>
Equalities Lead Officer	Democratic & Community Services Manager

Table 11.1 Assessment Description

Assessment Overview

Assessment Detail	Assessment Response
Purpose, aims and objectives of the policy, practice, service or function under impact assessment.	To set out the Council's sites for future development covering the period to 2031.

Assessment Detail	Assessment Response
<p>Are there any other organisations involved in its implementation?</p>	<p>Yes (in terms of implementing development proposals in the plan) - the private sector - primarily the development industry, housing associations, other public sector bodies like the County Council, the health authority.</p>
<p>Main customer groups (beneficiaries) / stakeholders</p>	<p><u>Customer Groups:</u></p> <ul style="list-style-type: none"> ● Residents ● Local businesses & employees ● Visitors to the District ● Development industry & associated agents ● Parish & Town Councils ● Organisations representing different racial, ethnic, national, religious and disabled persons groups ● Anyone looking to make a planning application in the District. <p><u>Other stakeholders:</u></p> <ul style="list-style-type: none"> ● Elected District Councillors ● Central Government ● National bodies such as utility companies, Natural England, English Heritage & the Environment Agency ● All neighbouring Councils
<p>Which other District Council departments are affected by the policy, practice, service or function? Do any of the objectives directly support or hinder another activity?</p>	<ul style="list-style-type: none"> ● The Development Management Team who will be required to assess planning applications taking into account the contents of this document. ● The Property section as the plan is likely to include allocations relating to Council owned land and the policies also apply to such land. ● Legal Services insofar as their role in planning appeals. ● Regulatory Services - insofar as their planning enforcement role. ● Leisure / Countryside - links with sports pitches, natural environment designations and TPOs. <p>The plan will support the role of all of the above Council departments. It is not considered that the plan will hinder such activities.</p>
<p>Assessing relevance to the public sector Equality Duty</p>	<p>The Staffordshire Moorlands Local Plan (site allocations) is primarily relevant to the second aim of the general Equality Duty, though there is also a link with the third aim.</p>

Assessment Detail	Assessment Response
<p>The general Equality Duty has three aims which require the District Council to have due regard to the need to:</p> <ul style="list-style-type: none"> ● eliminate unlawful discrimination (both direct or indirect), harassment and victimisation; ● advance equality of opportunity between all persons i.e. removing or minimising disadvantages suffered by protected groups; taking steps to meet the needs of people from protected groups where these are different from the needs of other people and encouraging people from protected groups to participate in public life or other activities where participation is disproportionately low; ● foster good relations between all persons i.e. tackling prejudice and promoting understanding between people from different groups. <p>Which aims of the Equality Duty is the policy, practice, service or function relevant to?</p>	
<p>What evidence is already available or needed to help establish the impact of the policy, practice, service or function on protected groups? (Include consideration of relevant data and research available locally and nationally; monitoring information; performance information; previous consultation and engagement e.g. residents' surveys, satisfaction surveys, focus groups; access to services data; complements and complaints; previous equality assessments. When considering gaps, think about</p>	<p><u>Local Demographic data</u></p> <p>Collected from Government – census data from 2011 Census (Source: National statistics website)</p> <p>What it tells you - The characteristics of the local population at District, ward and parish level - age structure, male / female split, proportion of the population with disabilities, ethnicity, marital status and religion etc.</p> <p><u>Gaps:</u> There is a lack of knowledge about a number of the protected characteristic groups at a local level. In particular, gender reassignment, pregnancy and maternity and sexual orientation where there is no data giving the proportion of people who fall into</p>

Assessment Detail	Assessment Response
<p>any additional monitoring arrangements needed and the need for further consultation).</p>	<p>these groups in the Staffordshire Moorlands. Pregnancy and maternity in particular is difficult to collect as it will change frequently.</p> <p>Although local data is available for age, disability, marriage, race, religion and sex, this merely covers how many people fit into each category and which parish / ward they live in.</p> <p><u>Equality Impact Assessment of Core Strategy (2014)</u></p> <p>Collected from: September 2007 – Initial Sustainability Appraisal; September 2008 – Preferred Options Sustainability Appraisal, May 2009 – Submission Version Sustainability Appraisal, August 2012 – Revised Submission Sustainability Appraisal - Council officers assessment undertaken as part of Sustainability Appraisal throughout Core Strategy production process. (Source: SMDC)</p> <p>What it tells you - Core Strategy spatial objectives have no negative impacts on equality. Impacts are either neutral or positive. The policies in the Local Plan will be based on those in the adopted Core Strategy.</p> <p><u>Indices of Multiple Deprivation</u></p> <p>Collected from: 2010 (published March 2011). (Source: National Statistics)</p> <p>What it tells you - Areas of deprivation across the area across different themes including income deprivation affecting children and older people.</p> <p><u>Equality Impact Assessment of Churnet Valley Masterplan (2014)</u></p> <p>Collected from: July 2013 – Council officer assessment undertaken as part of Sustainability Appraisal. (Source: SMDC)</p> <p>What it tells you - None of the Emerging Principles were identified as having negative impacts on equality. Impacts were identified as being either positive or neutral. There will be a specific Local Plan policy on the Churnet Valley.</p> <p><u>Equality Impact Assessment of the Statement of Community Involvement (2014)</u></p>

Assessment Detail	Assessment Response
	<p>Collected from: Undertaken in 2014 by a Council officer by completion of this matrix. (Source: SMDC)</p> <p>What it tells you - No negative impacts on protected groups were identified in the assessment. Impacts were mainly positive due to the nature of this document (i.e. how the Council will consult with the whole community on planning issues). A specific equalities section was included within the document.</p>
<p>Does the policy, practice, service or function have a positive or negative impact on people of a particular age such as children, young people, older people?</p> <p>Describe how and which</p>	<p><u>Positive Effects:</u></p> <p><i>Children</i> - The levels of development proposed will result in the need for new schools / extensions to schools in some parts of the District and specific sites are likely to be allocated in the plan to meet this need and ensure that children are able to go to a school close to where they live.</p> <p><i>Young people</i> – Generally has a positive impact as potential sites for housing and employment have been located in sustainable locations accessible by a choice of means of transport and are mainly focused around the towns. However, maintaining the viability of rural settlements is also a priority so sites are proposed in a large number of villages for housing which will give young people an opportunity to live within the area where they were raised. Also, a proportion of new housing will be affordable.</p> <p><i>Older people</i> – Housing will be located in sustainable locations close to services and facilities. Particular types of housing for older people - extra care schemes - may be specifically allocated in the plan but even if they are not, sites will be allocated which are suitable for such purposes and will help to meet the high demand for such accommodation in the towns.</p>
<p>Does the policy, practice, service or function have a positive or negative impact on people with disabilities including people with physical disabilities, sensory impairments, limiting long-term illnesses, learning disabilities or mental health difficulties?</p>	<p><u>Positive Effects:</u></p> <p>In terms of people with disabilities – generally positive as sites will be provided for new housing to meet demands within the District and this includes demand from those with disabilities. Housing and employment allocations will be in sustainable locations close to facilities and on public transport routes to ensure they are accessible to all. There</p>

Assessment Detail	Assessment Response
Describe how and which	will be an increased supply of new homes incorporating standards such as 'Building for Life' i.e. adaptable to suit all types of occupants, which can be more problematic with older housing stock.
Does the policy, practice, service or function have a positive or negative impact on any racial / minority ethnic groups ? Describe how and which	Considered to be the same as for the population as a whole i.e. meeting need for homes, new employment sites resulting in job opportunities, sites being located sustainably to allow access for all members of the community.
Does the policy, practice, service or function have a positive or negative impact on women or men including those living in particular communities? Describe how and which	Considered to be the same as for the population as a whole i.e. meeting need for homes, new employment sites resulting in job opportunities, sites being located sustainably to allow access for all members of the community.
Does the policy, practice, service or function have a positive or negative impact on pregnant women or people on maternity or paternity leave ? Please also consider any impacts on breastfeeding mothers . Describe how and which	Considered to be the same as for the population as a whole i.e. meeting need for homes, new employment sites resulting in job opportunities, sites being located sustainably to allow access for all members of the community.
Does the policy, practice, service or function have a positive or negative impact because of a person's marital status including civil partnership ? Describe how and which	Considered to be the same as for the population as a whole i.e. meeting need for homes, new employment sites resulting in job opportunities, sites being located sustainably to allow access for all members of the community.
Does the policy, practice, service or function have a positive or negative impact on people with a particular sexual orientation ? Describe how and which	Considered to be the same as for the population as a whole i.e. meeting need for homes, new employment sites resulting in job opportunities, sites being located sustainably to allow access for all members of the community.
Does the policy, practice, service or function have a positive or negative impact on people with particular religion or belief ? Describe how and which	Considered to be the same as for the population as a whole i.e. meeting need for homes, new employment sites resulting in job opportunities, sites being located sustainably to allow access for all members of the community.

Assessment Detail	Assessment Response
<p>Does the policy, practice, service or function have a positive or negative impact on trans people or people planning to or going through gender reassignment?</p> <p>Describe how and which</p>	<p>Considered to be the same as for the population as a whole i.e. meeting need for homes, new employment sites resulting in job opportunities, sites being located sustainably to allow access for all members of the community.</p>
<p>Does the policy, practice, service or function have a positive or negative impact on access for people in rural areas?</p> <p>Describe how and which</p>	<p>Generally positive as the allocations for housing will be spread extensively across the rural area giving people the opportunity to access new housing in their local area. Employment sites are proposed for allocation in a number of villages in the District providing access to land for small business opportunities and employment. New sites are being allocated in sustainable locations so that future occupants can access village facilities by a choice of means of transport.</p>
<p>Does the policy, practice, service or function have a positive or negative impact on other groups e.g. those experiencing deprivation or health inequalities?</p> <p>Describe how and which</p>	<p>Deprivation in this District tends to be in the towns and this is where the bulk of housing and employment development is proposed to take place which will give new employment opportunities and is likely to boost the economy of these areas. Also the only retail allocation will also be town based and consequently accessible to a deprived area. The sites selected for allocation will be spread throughout the towns including some within or adjoining deprived areas thereby helping to boost these areas and vary the social mix.</p> <p>Health inequalities – Again, most of the new development will take place in the towns in sustainable locations giving those with health problems the opportunity to be close to services and facilities.</p>
<p>If your policy, practice, service or function is partly or wholly provided by external organisations/agencies, please list any arrangements to ensure that they promote equality and diversity (Include this in your improvement plan)</p>	<p>N/A</p>
<p>Does your assessment show that a policy, practice, service or function may amount to potential adverse</p>	<p>No.</p>

Assessment Detail	Assessment Response
<p>impact between different protected groups? If yes please explain how the improvement plan is going to tackle this issue</p>	
<p>If an existing policy, practice, service or function, has it achieved its intended outcomes for the customer groups / stakeholders identified? If not, are there any equalities issues for protected groups?</p>	<p>N/A</p>
<p>If a new policy, practice, service or function, what factors <u>could</u> affect its intended outcomes from being achieved and are there any equalities issues for protected groups?</p>	<p>The overall intention of the new document will be to allocate sites for future development. As this is a statutory process where rigorous consultation and public examination takes place before the document can be adopted as Council policy, it is very unlikely that its overall intended outcomes (i.e. meeting the District's future housing needs) would not be achieved. Also, this document must undergo consultation in line with its Statement of Community Involvement which has been the subject of a separate Equalities Impact Assessment and has a specific equalities section which commits to engaging with hard to reach groups so that they are able to have their views considered as part of the process.</p> <p>Only positive impacts have been identified in the assessment above. There are no obvious negative impacts of the policy for protected groups based on the information the author had on the date the assessment was undertaken.</p>
<p>Can you think of any intentional or unintentional factors that could contribute to negative or differential impact?</p>	<p>No</p>
<p>Summarise the key issues resulting from this initial equality impact assessment and any measures identified to minimise or remove any adverse impact and promote equality of opportunity?</p>	<p>The key issue arising from this EIA is the limited local knowledge about protected characteristic groups on issues they have relating to planning and the built environment and other Council functions. Consequently, assessing the impact of any Council policy on these groups can be difficult.</p> <p>Actions:</p>

Assessment Detail	Assessment Response
	<ul style="list-style-type: none"> • Find out more about protected characteristic groups at a local level. Conduct general research to gather baseline information about protected groups at a local level. Need to fill in the gaps in knowledge in terms of: <ol style="list-style-type: none"> 1. proportions and distribution of each group within the District; and 2. particular issues and areas of difficulty each group has in relation to Council services. <p>Need adequate consultation so that protected groups are given the opportunity to become involved in the site allocations process. This is likely to involve outreach work.</p>
<p>From the information gathered above, does the policy, practice, service or function discriminate (either directly or indirectly) against any protected groups? Explain why?</p>	<p>No</p>
<p>Do you think this policy, practice, service or function should proceed to full EIA? Explain why</p>	<p>Yes, there is potential for the emerging Local Plan to have a differential impact on identified equality groups and it is important to ensure that this does not happen.</p>

Table 11.2 Assessment Overview

Appendix 1: Baseline Information

12 Appendix 1: Baseline Information

12.1 The Staffordshire Moorlands Locality Profile, published by Staffordshire County Council in October 2016 is a very useful reference for baseline information about the equality groups and equality issues.

Population

12.2 Around 97,900 people live in Staffordshire Moorlands. Based on the 2015 mid-year population estimates, the Staffordshire Moorlands population is made up as follows:

Age	%
under 5	4.6%
under 16	16.2%
16-64	59.9%
65+	23.9%
85+	2.7%

Table 12.1 Staffordshire Moorlands Age Profile

12.3 There are relatively fewer children aged under 16 and working age people (16-64) compared to England and more people aged 65 and over. The population is projected to have a small increase overall by 2025 but a much larger growth in people aged 65 and over (17%) and aged 85 and over (46%).

12.4 The proportion of Staffordshire Moorlands residents living in rural areas is 30.4%.

12.5 There are areas in Staffordshire Moorlands where families and communities face multiple issues such as unemployment or low incomes, low qualifications, poor housing, social isolation, ill-health (physical and/or mental) and poor quality of life. These wards are: Leek North, Biddulph East, Cheadle North East, Leek East, Caverswall, Cheadle South East and Churnet.

Race

12.6 The proportion of Staffordshire Moorlands residents from minority ethnic groups is 2.5% (2,400 people). This is the lowest of any Staffordshire Council area and significantly lower than the West Midlands (20.8%) and England (20.2%).

Ethnic Group	Number of People	%
White (including English, Welsh, Scottish, Northern Irish, Irish and other)	95,790	98.7%
White Gypsy or Irish Traveller ⁽¹⁾	35	0%
Mixed / Multiple Ethnic Groups	602	0.6%

Ethnic Group	Number of People	%
Asian / Asian British	502	0.5%
Black / African / Caribbean / Black British	120	0.2%
Other Ethnic Group	57	0%

Table 12.2 Ethnic Groups from 2011 Census

1. Romany gypsies and Irish travellers are recognised in law as distinct ethnic groups and legally protected from discrimination under the Equalities Act 2010

12.7 According to the 2011 Census, 99.1% of people living in Staffordshire Moorlands speak English. The other top languages spoken are Polish (0.3%).

Religion

12.8 The religious make up of Staffordshire Moorlands is 72.8% Christian, 19.3% No religion, 0.2% Muslim, 0.2% Buddhist, 0.1% Hindu. 6,575 people did not state a religion. (Source: 2011 Census)

Disability

12.9 According to the 2011 Census, 9.9% of Moorlands residents said their daily activities were limited a lot by a long term health problem or disability. This is slightly higher than the West Midlands figure of 9.1% and higher still than the figure for England as a whole at 8.3%. 11% of residents said that their daily activities were limited a little by a long term health problem or disability. This compares to 9.9% in the West Midlands and 9.3% in England.

12.10 Based on data from the 2011 Census, more residents in Staffordshire Moorlands provide unpaid care compared to the England average. This equates to around 12,600 people. In particular, 15% (3,100 people) of residents aged 65 and over provide unpaid care which is higher than the England average of 14%. When compared to CIPFA district comparators, Staffordshire Moorlands had some of the highest rates of residents providing unpaid care.

Sexual Orientation

12.11 Sexual orientation is whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes. The 2010/11 Integrated Household Survey estimates 1.5% of the UK population aged 18 and over are gay, lesbian or bisexual. The GP patient survey also asks about sexual orientation. From respondents who replied to the question on sexual orientation, just over 1.5% of Staffordshire and Stoke-on-Trent's population are gay, lesbian or bisexual compared with 1.9% across England. Whilst there will be a visible community of lesbian, gay and bisexual people in Staffordshire and Stoke-on-Trent, there will also be a significant invisible community. (Source: Staffordshire including the Moorlands & Stoke-on-Trent Partnership NHS Trust – 'Equality & Inclusion Data Analysis Report' March 2013).

Gender Reassignment

12.12 There is no clear consensus on how to define and enumerate the Trans population. However, it is likely that transsexual people represent only a small proportion of those who might be considered trans, estimates for the UK ranging between 1,550 and 5,000 (EHR). There is increasing recognition of the rights of transsexual and transgender service users and employees, with the Gender Recognition Act granting legal recognition of a changed gender for transsexual people.

12.13 Gender reassignment is the process of transitioning from one sex to another. Protection is provided where someone has proposed, started or completed a process to change their sex. In the UK, it is estimated that one in 4,000 people are receiving medical help for gender dysphoria. This equates to around 275 people in Staffordshire and Stoke-on-Trent.

12.14 However, there may be many more people with the condition who have yet to seek help. On average, men are diagnosed with gender dysphoria, five times more often than women. (Source: Staffordshire including the Moorlands & Stoke-on-Trent Partnership NHS Trust – ‘Equality & Inclusion Data Analysis Report’ March 2013). There is no locally specific data available for the Staffordshire Moorlands at the time of writing.

Older People

12.15 The rate of increase in the number of older people in Staffordshire Moorlands is faster than the England average equating to 1,300 additional residents aged 85 and over by 2025.

12.16 Life expectancy has increased but the number of years spent in good health has not. More older people than average have a limiting long term illness and this contributes to the number of years people spend in poor health towards the end of life. Men and women spend 15 and 18 years in poor health respectively.

12.17 There are more single pensioner households than average in the Staffordshire Moorlands.

12.18 Ten wards have higher proportions of households with lone pensioners: Alton, Bagnall & Stanley, Biddulph North, Biddulph South, Brown Edge and Endon, Cellarhead, Cheadle South East, Churnet, Leek East and Leek North.

Younger People

12.19 Health is a significant issue amongst children. Around 25% of children aged four to five in Staffordshire Moorlands have excess weight (overweight or obese) with rates being higher than average. Prevalence is higher in seven wards: Biddulph East, Biddulph South, Caverswall, Cheadle North East, Cheadle South East, Churnet and Leek North. Around 32% of children aged 10-11 (Year 6) have excess weight with rates being higher than average. Prevalence is particularly high in three wards: Cheadle South East, Leek North and Manifold. When compared to CIPFA district comparators, for both Reception and Year 6 children, Staffordshire Moorlands had some of the highest rates.

Gender

12.20 The Staffordshire Moorlands population has a fairly even male / female split. In 2011, 49.2% of the Staffordshire Moorlands population was male and 50.8% was female.

12.21 Overall life expectancy at birth in Staffordshire Moorlands is 80 years for men and 83 years for women, both similar to the national averages. When compared to CIPFA district comparators, life expectancy for women in Staffordshire Moorlands performs poorly.

12.22 Men and women living in the most deprived areas of Staffordshire Moorlands live three years and four years less than those living in less deprived areas.

12.23 Healthy life expectancy in Staffordshire Moorlands is 64 years for men and 65 years for women which is longer than average. Women in Staffordshire Moorlands spend more of their lives in poor health than men (18 years compared to 15). In addition, healthy life expectancy for men remains below retirement age which has significant long-term implications, for example, while men are expected to work later into their 60s many will not be healthy enough to do so.

Poverty

12.24 There are three lower super output areas (LSOAs) that fall within the most deprived national quintile in Staffordshire Moorlands, making up around 5% of the total population (4,500 people). These areas fall within Biddulph East and Leek North.

Health

12.25 A significant number of residents have excess weight, eat unhealthily and are inactive.

12.26 There is a higher proportion of residents in Staffordshire Moorlands with a limiting long-term illness compared to the national average, particularly amongst those aged 65 and over. When compared to CIPFA district comparators, Staffordshire Moorlands had some of the highest rates.

12.27 The number of people on depression, diabetes, dementia and hypertension registers in Staffordshire Moorlands is higher than the national average

Appendix 2: Equality Action Plan

13 Appendix 2: Equality Action Plan

13.1 The table below records Staffordshire Moorlands District Council and High Peak Borough Council's Corporate Equality Objectives 2018/19.

Equality Objectives	Action
Knowing our communities	
To understand who lives in our communities and their needs.	Update the Community Profile (a resource which describes the makeup of our borough/district by protected characteristics) and promote its use to service managers. See also consultation (below)
Place shaping, leadership and commitment	
To clearly state our equality priorities and ensure that we have systems in place to achieve them.	Ensure that measures are included in service plans as they are revised and brought together as an overall plan.
Community engagement and satisfaction	
To ensure that we include those with 'protected characteristics' in our consultation and engagement processes.	Update the consultation forward plans.
Responsive services and Customer care	
To ensure that equality performance actions are included in relevant service plans and monitored.	Incorporate consideration of equality impacts as part of the Modern Gov. committee management process. Train managers to understand the equality impact assessment process.
A modern and diverse workforce	
To ensure that our workforce reflects as far as possible the makeup of the community we serve and has the necessary skills	Pilot the use of a staff profile questionnaire (collecting information in relation to protected characteristics) and promote to staff. Provide equality training for staff.

Table 13.1 Equality & Diversity Scheme: Action Plan 2018-2019

