

Community and Equality Impact Assessment

As an authority, we have made a commitment to apply a systematic equalities and diversity screening process to both new policy development or changes to services.

This is to determine whether the proposals are likely to have significant positive, negative or adverse impacts on the different groups in our community.

This process has been developed, together with **full guidance** to support officers in meeting our duties under the:

- Equality Act 2010.
- The Best Value Guidance
- The Public Services (Social Value) 2012 Act

About the service or policy development

Name of service or policy	Meeting the identified need for Gypsy and Traveller pitches
Lead Officer	Alex Philpott, Principal Planning Officer
Contact Details	Alex.philpott@befirst.london

Why is this service or policy development/review needed?

The draft Local Plan is currently at examination and preliminary hearing sessions were conducted in July 2022. A key risk identified by the Planning Inspectors is that the draft Local Plan currently does not allocate sufficient sites to meet the identified need for Gypsy and Traveller pitches up to 2037.

A Gypsy and Traveller Needs Assessment was conducted in 2020 which identified a need of 25 traveller pitches up to 2037. It was intended that this need could be met in full through sites at Choats Road, Collier Row Road and the expansion of the existing site at Eastbrookend Country Park. As the landowners at Choats Road and Collier Row Road have since stated that this land is no longer available, the only site that can contribute to meeting the identified need is the expansion of the existing site at Eastbrookend Country Park, which can deliver 12 of the 25 pitches required.

The Council has since conducted a review of available sites in the Borough to meet the remaining identified need of 13 pitches, which has identified 60 potential sites. Following a robust assessment, only one site at 47 Thames Road is considered to be suitable, available and achievable and could deliver up to 13 pitches in total.

Should the Council endorse both the expansion of the existing site at Eastbrookend Country Park and 47 Thames Road, the draft Local Plan could meet the identified need for traveller pitches in full and meet the requirements of national planning policy and ensure that the needs of a protected group are catered for.

1. Community impact (this can be used to assess impact on staff although a cumulative impact should be considered).

What impacts will this service or policy development have on communities?
 Look at what you know. What does your research tell you?

Please state which data sources you have used for your research in your answer below

Consider:

- National & local data sets
- Complaints
- Consultation and service monitoring information
- Voluntary and Community Organisations
- The Equality Act places a specific duty on people with ‘protected characteristics’. The table below details these groups and helps you to consider the impact on these groups.

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- It is Council policy to consider the impact services and policy developments could have on residents who are socio-economically disadvantaged. There is space to consider the impact below.

The Council recognises the importance of considering equality and diversity issues in all aspects of its work. The Borough has a duty under the Equalities Act 2010 to undertake an Equality Impact Assessment (EqIA) on the Local Plan (LP). The Equalities Act 2010 protects people from discrimination on the basis of certain protected characteristics, namely: age, disability, ethnicity, gender, gender reassignment, marriage & civil partnership, pregnancy & maternity status, religion & belief and sexual orientation. The Council also aims to interrogate disproportionate impact on people on the basis of Socio-economic status.

The purpose of this document is to ensure that all policies are evaluated in terms of their potential impact, both positive and negative, on the Borough's diverse population. Where negative impacts are anticipated, the EqIA can recommend methods to avoid discriminatory or negative consequences of any proposed policy on any particular group.

The 2021 Census identified that 0.1% of the population in Barking and Dagenham are Gypsy or Irish Travellers. Romany Gypsies and Scottish and Irish Travellers are recognised ethnic groups who have needs relevant to their ethnicity and culture, and all the duties on public bodies under the Equality Act 2010, Human Rights Act 1998 and relevant case law apply. Gypsies, Travellers and Roma are among the most disadvantaged people in the country and have poor outcomes in key areas such as health and education.¹ The Council therefore has a legal duty to ensure that where there is an identified need for additional traveller pitches that that need is met in full.

Potential impacts	Positive	Neutral	Negative	What are the positive and negative impacts?	How will benefits be enhanced and negative impacts minimised or eliminated?
Local communities in general		X			
Age	X			Young children and older people have particular needs for new traveller pitches in order to have a settled base for access to healthcare and education.	Delivery of additional traveller sites to meet anticipated future needs would ensure that all age groups, especially young children and older people, have their accommodation needs met and can access education and healthcare.
Disability	X			People with disabilities require their accommodation needs to be met through settled	Meeting our identified future need for traveller pitches will ensure that the needs of people

¹ <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/full-report.html>

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			sites in order for their accessibility needs to be catered for and can have access to essential services.	with disabilities are met and can access essential services.
Gender reassignment		X		
Marriage and civil partnership		X		
Pregnancy and maternity	X		Having a settled traveller site will ensure that those who are pregnant or have young children have access to essential services.	Meeting our identified future need for traveller pitches will ensure that their needs can be met and have access to essential services, ensuring that they have the best start to life.
Race (including Gypsies, Roma and Travellers)	X		Romany Gypsies and Scottish and Irish Travellers are recognised ethnic groups who have needs relevant to their ethnicity and culture, and all the duties on public bodies under the Equality Act 2010, Human Rights Act 1998 and relevant case law apply. Should the Council not put in place adequate service provision for Gypsy and Travellers, there is a risk of failing to provide for all parts of the community and not comply with the Equality Act 2010.	The expansion of the existing traveller site at Eastbrookend Country Park and the delivery of a site at 47 Thames Road have been identified as being suitable, available and achievable for the delivery of traveller pitches. By endorsing the recommended sites and meeting the identified need, the Council will ensure that it is meeting the specific needs of a protected group and would therefore comply with the requirements of the Equality Act 2010, Human Rights Act 1998 and relevant case law.
Religion or belief		X		
Sex		X		
Sexual orientation		X		
Socio-economic Disadvantage	x		Gypsies, Travellers and Roma are among the most disadvantaged people in the country and have poor outcomes in key areas such as health and education.	Meeting our identified need for traveller pitches will ensure that Gypsies and Travellers have access to essential services such as healthcare and education which would improve socio-economic outcomes.

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Any community issues identified for this location?		X			
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2. Consultation.

Provide details of what steps you have taken or plan to take to consult the whole community or specific groups affected by the service or policy development e.g. on-line consultation, focus groups, consultation with representative groups.

If you have already undertaken some consultation, please include:

- Any potential problems or issues raised by the consultation
- What actions will be taken to mitigate these concerns

Local Plan Consultation Strategy

In accordance with Regulations 18 & 19 of The Town Planning and Country Planning (Local Planning) (England) Regulations 2012, the new Local Plan will undergo several rounds of public consultations prior to submission.

The first of these was conducted between 14 October 2015 and 29 Jan 2016, in accordance with Regulation 18, which consulted on possible Issues and Options to guide the first stage of plan making at a strategic level.

A second Regulation 18 consultation was conducted between 29 November 2019 and 29 February 2020 to further inform the plan making process at a detailed, policy-focused level.

Following this, a further consultation was conducted between 5 October 2020 and 29 November 2020, in accordance with Regulation 19, giving respondents the opportunity to review the Test of Soundness and the Legal Compliance of the final draft of the Local Plan prior to submission to the Planning Inspectorate.

After consideration of the responses received from the Regulation 19 consultation a second round of consultation in accordance with Regulation 19 was conducted between 11 October 2021 and 28 November 2021, giving respondents a further opportunity to review the Test of Soundness and the Legal Compliance of the final draft of the Local Plan prior to submission to the Planning Inspector.

Issues and Options Consultation Summary Between October 2015 and January 2016

The following methodology was used to ensure that people could share views through their preferred method. This included:

- **Hardcopies:** All consultation documents were available to view at libraries, GP surgeries and community centres across the Borough, as well as the Town Hall.
- **Website:** A Local Plan consultation webpage was hosted on the LBD Council website, providing documents supporting the consultation and a link to the online consultation system.
- **Questionnaires:** Two questionnaires (a short survey and a longer questionnaire) were published

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- **Emails & letters:** Sent to the Chamber of Commerce, Barking and Dagenham Council for Voluntary Services, Faith Forum, Elderly Forum, Creative Barking and Dagenham, Residents Urban Design Forum, Bold and Dynamic distribution list (the Council's magazine), Borough head teachers.
- **Marketing & Publicity materials:** (including but not limited to) posters, business cards, e-newsletter, promotional consultation video
- **Consultation events:** Early awareness event at LBBD's One Borough Community Day; a pop-up consultation event at Barking Asda; drop-in sessions at community centres in the Borough.
- **Consultation meetings:** Meetings were held with a range of stakeholders, including: LBBD Members, Barking Town Team, Tenants and Residents Associations, The Leaseholders' Association, The Disability Forum, The Youth Forum, The Chamber of Commerce, Barking and Dagenham Tenants' Federation, and The Faith Forum. The Regulation 18 (1) consultation report will be published on the Council's web site prior to further consultation on the Draft Local Plan.

Regulation 18 Consultation Between November 2019 and February 2020

A second round of consultation on the Draft Local Plan took place from November 2019 to February 2020. The aim of this consultation was to feedback on the policies and potential site allocations in the Draft Local Plan. Similar Methods to those used in the Regulation 18 (1) consultation were used in order to reach as many stakeholders as possible. The consultation strategy included:

- **Website:** consultation webpage with links to consultation system where the public will be invited to provide structured feedback in the form of a questionnaire
- **Email:** An extensive database of statutory consultees, stakeholders and interested parties, were invited by email to respond
- **Publicity & Social Media:** A targeted social media strategy to inform the community about the policies in the Draft Local Plan and engage the public with providing feedback. A press release was published, e-newsletter, and additional announcements on the Council's social media platforms.
- **Workshop with internal service providers: Face-to-face engagement:** Engagement with LBBD service providers to discuss infrastructure needs and planning.

Regulation 19 Consultation Strategy

The Regulation 19 Consultation took place in Autumn 2020. Owing to the closure of libraries and Council offices (due to the presence of the COVID-19 pandemic) the consultation has a focus on outreach via digital platforms. These methods included:

- **Email/Letter:** Notifying interested parties by email and letter
- **Social Media and Local Publicity:** Advertising consultation materials on social media (e.g. Facebook, Twitter) and local press
- **Telephone:** Making phone calls to a number of interested parties (e.g. active community groups)

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If you have already undertaken some consultation, please include:

- Any potential problems or issues raised by the consultation
- What actions will be taken to mitigate these concerns

- **Website:** Using an information hub to present our consultation documents, for instance, interactive story maps for showing proposed site allocations and planning policies. Respondents will be strongly encouraged to send their responses via digital means over physical documents due to the closure of Council buildings.

Second Regulation 19 Consultation Between October 2021 and November 2021

A second round of consultation on the Draft Local Plan took place from October 2021 to November 2021. The aim of this consultation was to feedback on the policies and potential site allocations in the Draft Local Plan. Similar Methods to those used in the Regulation 18 (1) consultation were used in order to reach as many stakeholders as possible. The consultation strategy included:

- **Website:** consultation webpage with links to consultation system where the public will be invited to provide structured feedback in the form of a questionnaire
- **Email:** An extensive database of statutory consultees, stakeholders and interested parties, were invited by email to respond
- **Publicity & Social Media:** A targeted social media strategy to inform the community about the policies in the Draft Local Plan and engage the public with providing feedback. A press release was published, e-newsletter, and additional announcements on the Council's social media platforms.
- **Online workshops open to members of the public:** Engagement interest stakeholders to discuss infrastructure needs and planning.
- **Copies available for viewing in Libraries**

3. Monitoring and Review

How will you review community and equality impact once the service or policy has been implemented?

*These actions should be developed using the information gathered in **Section 1 and 2** and should be picked up in your departmental/service business plans.*

Action	By when?	By who?
Examination of Regulation 19 Local Plan (and Equality Impact Assessment).	Summer 2024	Planning Policy Team
To produce an up-to-date Authority Monitoring Report (AMR) of the adopted Local Plan and keep it under review annually to ensure the local plan policies are meeting their objectives. The methods used to assess	Ongoing	Planning Policy Team

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the success of the local plan policies will include monitoring development pipelines, build out rates and the delivery of new Gypsy and Traveller pitches.

Whilst the AMR does not solely (and explicitly) monitor the equalities impact of the local plan, the policies proposed in the Draft Local Plan aim for overall improvements in the Borough from which all people should benefit. It is requirement for a local authority to produce an Authority Monitoring Report (Section 113 of the Localism Act 2011). This amends Section 35 of the 2004 Planning and Compulsory Purchase Act which previously required Local Planning Authorities to submit an Annual Monitoring Report to the Secretary of State.

The Localism Act removes this requirement but retains the need for local authorities to produce a monitoring report for public consumption. The draft Local Plan includes Appendix 3: Local Plan Key Performance Indicators. The key indicators will be monitored along with commentary on other key social, economic and environmental changes that impact on plan delivery and the delivery context as part of the authorities. Informed by the strategy in the Local Plan they are grouped into five themes:

- Design, heritage and conservation
- Housing
- Employment
- Infrastructure
- Environment

An example of a Key Performance Indicator is no.4 net and gross number of new homes completed, started and permitted within monitoring period. This indicator falls under the housing category and relates to SP3: Delivering homes that meet people need.

4. Next steps

It is important the information gathered is used to inform any Council reports that are presented to Cabinet or appropriate committees. This will allow Members to be furnished with all the facts in relation to the impact their decisions will have on different equality groups and the wider community.

Take some time to summarise your findings below. This can then be added to your report template for sign off by the Strategy Team at the consultation stage of the report cycle.

Implications/ Customer Impact

Romany Gypsies and Scottish and Irish Travellers are recognised ethnic groups who have needs relevant to their ethnicity and culture, and all the duties on public bodies under the Equality Act 2010, Human Rights Act 1998 and relevant case law apply. Work has been undertaken to identify suitable sites which can meet the identified need for traveller pitches in the draft Local Plan up to 2037.

Cabinet has been recommended to endorse the proposed approach to meeting the identified need for traveller pitches through the expansion of the existing traveller site at Eastbrookend Country Park. Allocating the newly identified site at 47 Thames Road would mean that the Council is able to meet the future identified need for traveller pitches in full and fulfil the Council's obligations as set out in national planning policy and within the Equality Act 2010.

Overall, the proposed measures are considered to have a positive impact on a protected group.

5. Sign off

The information contained in this template should be authorised by the relevant project sponsor or Divisional Director who will be responsible for the accuracy of the information now provided and delivery of actions detailed.

Name	Role (e.g. project sponsor, head of service)	Date
Tim Thomas	Head of Transport, Infrastructure and Policy Planning, Be First	April 2023
Caroline Harper	Chief Planning Director, Be First	April 2023
James Coulstock	Interim Strategic Director of Inclusive Growth	April 2023