

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

Diversity Impact Assessment Statement

Diversity Impact Assessment Statement for the Joint Core Strategy for Broadland, Norwich and South Norfolk

August 2012

A legal challenge to the adoption of the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) was received on 3 May 2011 from Stephen Heard, Chairman of Stop Norwich Urbanisation. High Court Judge Mr Justice Ouseley made his judgment on 24 February 2012 and published his final order regarding the legal challenge to major growth in the Greater Norwich area on 25 April 2012.

Mr Justice Ouseley found that those parts of the Joint Core Strategy concerning the Broadland part of the Norwich Policy Area, including the North East Growth Triangle (a total of 9,000 dwellings) should be remitted for further consideration and that a new Sustainability Appraisal for that part of Broadland in the NPA be prepared.

The effect of the Order was to remit the relevant parts of the JCS to a point where they were treated as if all the stages up to Publication under Regulation 19 had been taken, but these parts of the JCS had not progressed further.

Therefore having considered the sustainability appraisal work, the Councils must publish the remitted parts of the JCS, (subject to amendments, if any) and the other documents required at pre-submission stage, which includes a Diversity Impact Assessment Statement.

The Diversity Impact Assessment Statement, included as part of this document, was published as part of the Pre-Submission Publication Stage of the JCS on 2 November 2009.

The councils consider that there have not been any significant changes to the Baseline Data that would result in an update to the Diversity Impact Assessment Statement being required.

This Statement is therefore submitted to support the Regulation 19 Proposed Submission Publication of the Joint Core Strategy for Broadland, Norwich and South Norfolk addressing the Judgement of Mr Justice Ouseley in Heard v Broadland District Council, South Norfolk District Council and Norwich City Council.

Greater Norwich Development Partnership



Diversity Impact Assessment Statement

Diversity Impact Assessment for the Joint Core Strategy
for Broadland, Norwich and South Norfolk

Jobs, homes, prosperity for local people



Introduction

Broadland District Council, Norwich City Council and South Norfolk Council are committed to carrying out Diversity Impact Assessments as a means of integrating diversity objectives within the mainstream activities of the three councils.

The Joint Core Strategy sets the spatial planning framework to deliver regeneration, development and growth within the three districts. It will deliver the spatial elements of the Sustainable Community Strategies for the three districts. The overarching aim of the strategy is to build sustainable communities with the key elements including:

- the opportunity to play an active part in community life and be involved in decision making
- healthier and safer places and a high quality environment
- access to suitable housing, jobs, facilities and services
- opportunities for people to learn at all stages of life
- the right transport infrastructure so people can travel using varied forms of transport

An initial assessment has been carried out to identify any potential impacts that the Joint Core Strategy may have across the six strands of the diversity agenda.

Test of Relevance

The first step of the Diversity Impact Assessment is to provide an indication on whether the function has a 'high', 'medium' or 'low' impact against the diversity criteria. This is called the test of relevance. Appendix A contains the full results of the test of relevance.

In summary the findings suggest that the plan may have a high relevance on race and a medium relevance on age. With regards to race, this is due to the Joint Core Strategy (JCS) providing for permanent and transit Gypsy and Traveller sites that will reduce the potential issues associated with unauthorised sites and may tackle a number of disadvantages faced by these communities, particularly relating to low educational achievements and poor health. It will also assist community cohesion by providing properly serviced sites that will not give rise to issues raised by settled community which are generally associated with unauthorised sites. However it has been identified that community cohesion may be an issue in locations where new Gypsy and Traveller sites are proposed. Opportunities will be sought to foster trust between the settled and travelling community and reduce suspicion and people's negative perception of Gypsy and Travellers which is often a result of issues associated with unauthorised sites. The Gypsy and Travellers will also be encouraged to use mainstream education and health services which will aid integration particularly among the younger generation.

In relation to age, the JCS provides for housing of different scales across a range of settlements. The housing will be of an appropriate mix of sizes, types and tenures which will be suitable for people of different ages. The affordability of housing is of concern to many young people and as such the increased provision of affordable housing will help those in housing need. Furthermore an increase in jobs (particularly higher value, knowledge economy jobs) in the area will help retain

younger people in the Norfolk area rather than them moving away to seek alternative employment.

All other strands have a low relevance. This is due to the JCS being high level and not designed to contain specific detail.

Screening

A screening exercise was undertaken which used baseline data and consultation responses to identify whether different groups have different needs in relation to the Joint Core Strategy. This is outlined below:

Baseline data

A range of information has also been collected and analysed to provide baseline information about the area and several evidence studies have been undertaken to help identify whether different groups have different needs. The findings are summarised as follows:

- in general there is an older population in Broadland and South Norfolk, whereas more younger people aged between 15 and 44 live in Norwich. Migration between the districts is characterised traditionally by couples and older people moving out of the urban areas and into the suburban and rural locations, while younger people or single people of all ages, show a preference for living in the city. Nearly half of the population of Broadland and South Norfolk are over 45, compared to only 35% in Norwich.
- Broadland and South Norfolk are likely to experience a continued fall in the share of younger people and an increase in the population aged over 45 years old. As the population grows and ages, the need to supply facilities and services and in particular the access to them, especially in the rural area, will become increasingly pressing. An increasingly ageing population and a rising level of people with disabilities

will require homes to be built to lifetime homes standards as well as the need to provide specialised accommodation where appropriate including supported housing, care facilities and retirement communities.

- the retention and attraction of young people through jobs provision and access to the housing market is a key priority. There is a need to expand all sectors of the economy and workforce but in particular to increase the proportion of higher value, knowledge economy jobs. Opportunities for innovation, skills and training need to be expanded in parallel. This would help retain younger people in the Norfolk area rather than them moving away to seek alternative employment.
- with regards to both housing and employment the needs of the younger and older population differ. Everyone should be able to have access to suitable housing that reflects their needs and there needs to be excellent opportunities for lifelong learning and personal development to contribute to the life of their communities, and to the economy.
- there is an identified need in the area for Gypsy and Travellers sites to reduce the potential issues associated with unauthorised sites and to tackle a number of disadvantages faced by these communities, particularly relating to low educational achievements and poor health. Sites should ideally be in locations which facilitate access to local services and which (particularly for transit sites) follow the patterns of movement of the community.
- the proportion of the population for whom English is their second language is increasing. This is likely to have implications for the future provision of services and facilities such as education and community learning.

Consultation process

Extensive consultation was carried out through the process of producing the Joint Core Strategy with particular effort being made to ensure that the JCS reflected the views of as many interest groups as possible including some traditionally 'hard to reach' groups – the elderly, children, disabled community, ethnic minority and faith groups. Issues raised by stakeholders are as follows:

- the need for a range of city centre service functions, beyond retailing was recognised, including facilities for education, training, health and young people.
- for leisure developments respondents supported a strategy that would provide a wider range of facilities for all age groups rather than just focusing primarily on young people.
- in relation to Gypsies and Travellers, responses showed support for transit sites close to the A11 and A47 routes through the area. Respondents also favoured (by a small margin) the provision of more smaller sites, rather than large sites for travellers, but opposed provision of sites within the growth areas.
- ensure that there is sufficient capacity in schools.
- health provision for the growing elderly population.
- better graduate opportunities and more employment opportunities in service sector jobs.
- homes should be more suitable for older people and there is a need for more family houses with gardens.

Young people raise the issues of:

- the need for more affordable housing
- insufficient jobs in the area
- cost, reliability, poor level of bus service in the area
- the need for more varied leisure opportunities at an affordable price
- the need for more green spaces.

Friends, family and Travellers raise the issues of:

- the limit on site size is arbitrary
- site search for residential sites should not be contained by main routes
- the policy makes no mention of the separate and distinct needs of New Travellers in particular

Actions

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

The potential adverse impacts which this screening exercise has flagged up and which must be taken into consideration at the more detailed policies and proposals stage are as follows:

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

Concluding remarks

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

Test of relevance pro forma

Name of the policy or function:	Joint Core Strategy for Broadland, Norwich and South Norfolk		
Date relevance test conducted:	05/08/09		
Is the policy or function: (please tick as appropriate)	New? <input checked="" type="radio"/>	Revised? <input type="radio"/>	Existing? <input type="radio"/>

Can the delivery of this policy or function help the council deliver the following equality duties?	Equality strands																	
	Race			Gender			Disability			Age			Sexual orientation			Religion/belief		
1. Promoting equality of opportunity	H			L			L			M			L			L		
2. Eliminating discrimination	H			L			L			L			L			L		
3. Preventing harassment	H			L			L			L			L			L		
4. Promoting good relations	H			L			L			L			L			L		
5. Encouraging participation in public life	L			L			L			L			L			L		
No. of relevant elements per strand	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L
	4	0	1	0	0	5	0	0	5	0	1	4	0	0	5	0	0	5
Total:	H 4						M 1						L 25					

Priority level:

High relevance:	The policy or function is relevant to 4 or 5 elements of the general equality duty
Action required:	Complete a full diversity impact assessment during year 1
High relevance:	The policy or function is relevant to 2 or 3 elements of the general equality duty
Action required:	Complete an initial screening and/or a full impact assessment by year 2
High relevance:	The policy or function is relevant to 0 or 1 elements of the general equality duty
Action required:	Complete an initial screening by year 3

For more information or if you
require this document in another
format or language, please phone:

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for South Norfolk Council

Diversity Impact Assessment

Joint Core Strategy for Broadland, Norwich and South Norfolk
November 2009

