

Equality Impact Assessment Form

Where a question is not relevant for your assessment please indicate. Where you do not have sufficient data please indicate this and the actions you will be taking to remedy this.

Note: where applicable, appendices and additional notes should be included

1. What is the name of the policy document to be assessed?

Plan E Proposed Submission Document – Epsom Town Centre Area Action Plan; forming part of the Epsom & Ewell local development framework (LDF)

2. Name, job title and department of person completing assessment

Karol Jakubczyk
Planning Policy Manager
Planning Department/ Planning Policy Team

3. What are the key purpose/objectives of this policy document being assessed?

Plan E is a form of Area Action Plan, and is being produced as part of the Council's LDF. It builds upon the overarching vision for the Town Centre set out in both the Community Strategy and the Council's Core Strategy (Policy CS14).

Plan E is a strategic policy document that provides a detailed vision for the future of Epsom Town Centre. It maps out a way forward for the Town Centre over the next 15 to 20 years, establishing a framework to show how change will take place, how it will be managed and how it will be delivered. It brings together the objectives of many organisations and individuals with an interest in the Town Centre. It also considers the way the Town Centre functions as a whole.

Plan E identifies the following key objectives for the Town Centre:

- ❖ a vibrant, healthy and safe shopping environment combined with a high quality townscape and attractive and accessible environment for all
- ❖ thriving day-time and night-time economies
- ❖ new developments which are sensitive to the important historic environment will reinforce the distinctiveness of the different character areas and create a "sense of place"
- ❖ improved retail attractions increasing the range of types and form of shops and other high street facilities and services
- ❖ an improved range and quality of cultural, leisure, social and visitor attractions, including attractive areas in which to sit and to socialise
- ❖ an improved public realm that contributes to the Town Centre's historic character and appearance and provides opportunities for biodiversity enhancements
- ❖ improved public transport links and facilities, combined with an enhanced environments for pedestrians and cyclists, providing clear and safe opportunities for movement around the town
- ❖ the introduction of measures to reduce the seriously detrimental impact of vehicular traffic
- ❖ a mix of housing, including affordable housing to meet local needs, located close to amenities and public transport
- ❖ a range of business opportunities providing a wide choice of jobs but broadly maintaining the present balance between employment uses and other town centre activities
- ❖ an improved sense of safety and security for all town centre users, at all times of the day and night, and a reduction in anti-social behavior
- ❖ a centre which can be planned, managed and promoted in a positive way.

Are the objectives consistent with the Council's Corporate Equalities Policy?

Yes, the objectives set out within Plan E are consistent with the Council's key priorities, core values and its equality policy. The Council has a core value of valuing diversity and equality. Examples from Plan E's overarching objectives include:

- ◆ The delivery of high quality townscape that is attractive and accessible to all. This meets the policy by encouraging and enabling the use of the Town Centre by all.
- ◆ A wide range of retail opportunities, which meet the needs of all residents. This meets the

policy by providing shopping opportunities for those target groups on low incomes and with specific shopping needs (such as the elderly, young, disabled and ethnic groups).

- ◆ An improved range and quality of cultural, leisure, social and visitor attractions that meet the needs of residents and visitors to the Town Centre. This meets the policy by ensuring that there is sufficient appropriate provision to meet the needs of the Borough's different communities.
- ◆ Improvements to public transport infrastructure and services, coupled with improvements to pedestrian and cycling provision, which are aligned with measures that reduce the adverse impact of highway traffic. This meets the policy by making the Town Centre more accessible to target groups such as the elderly, the young, the disabled and those on low incomes.
- ◆ Providing an appropriate mix of new housing, including affordable provision that meets local needs, located close to amenities and public transport.
- ◆ Ensuring a broad range of employment opportunities. This meets the policy by ensuring that appropriate levels of employment provision are provided locally.
- ◆ Improvements to safety and security will meet the policy requirement by making the Town Centre an environment that can be safely enjoyed by all users.

Policy examples of this include:

- ◆ The visions for the different constituent parts of the Town Centre, which specifically identify improvements to accessibility, in terms of pedestrian movement, cycling and public transport; the provision of safe places for people to meet, eat and drink; the provision of an appropriate mix of shopping and employment opportunities; and the redevelopment of Epsom Station as a vibrant sustainable transport hub
- ◆ Policy E6 seeks to maintain the overall level of leisure provision available within the Town Centre, with particular emphasis upon the development of leisure and cultural, and other family friend uses that contribute towards a safe evening economy.
- ◆ Policy E8 supports the development of low carbon impact/ renewable decentralized energy generating sources within the Town Centre. This could provide residents and business with local heating and power sources that could provide a cheaper alternative to centralized sources – this may benefit some target groups (such as the elderly and those residents on low incomes).
- ◆ Policy E9 seeks public realm improvements, which will benefit all Town Centre users – including those within target groups. Specifically, such improvements will contribute to accessibility improvements, which will be of particular benefit to the mobility impaired.
- ◆ Policy E10 seeks to improve conditions for cyclists; this meets the equality policy by catering for those target groups (such as the young and those members of the community on low income) who cannot afford to access the Town Centre by car.
- ◆ Policy E14 seeks to redevelop a strategic site at Upper High Street/ Depot Road for a mix of uses, including new housing, retail, employment and a number of community uses. This meets the policy objective by specifically providing a new surgery and a place of worship at an accessible town centre location.
- ◆ Policy E15 seeks to redevelop a strategic site at the Utilities site, East Street for a mix of uses, including new housing, employment and open space uses. This meets the policy objective by specifically providing public open space provision in an accessible town centre location.
- ◆ Policy E16 seeks to redevelop Epsom Station for a mix of uses, including new housing, retail and hotel accommodation. This meets the policy objective by specifically providing an improved transport interchange, employment provision and a mix of housing at an accessible town centre location.
- ◆ Policy E17 seeks to redevelop a number of sites across the Town Centre for a variety of uses. This policy specifically meets the policy objective by delivering improvements to accessibility (at the Market Place), meeting housing needs (a variety of sites), employment opportunities (a variety of sites), improved community services (the emergency services site) and the potential for new healthcare uses (the former Magistrates Court and the Comrades Club).

4. Describe the main activities of this service/policy/procedure/project

Plan E provides a planning policy framework for managing the future development of Epsom Town Centre to ensure that it remains an accessible, economically vibrant and vital centre for residents and visitors to shop, work, play and live. It seeks to deliver this vision by applying the following:

- ◆ Visions of how the different parts of the Town Centre (such as the Market Place, High Street and Upper High Street) will develop over the next 15/ 20 years
- ◆ A series of planning policies that manage the delivery of the overarching and separate spatial visions for the Town Centre – for example; how different types of high street retail and commercial activity will be directed to specific locations; improvements to public realm, street furniture and biodiversity could be incorporated; improvements to accessibility; and how the Town Centre's character and appearance will be maintained and enhanced
- ◆ Examining opportunities for re-introducing formalized town centre management
- ◆ Identifying specific highway improvement proposals that will be explored in greater detail during the Plan E period
- ◆ Identifying opportunity sites across the Town Centre where development can take place (to help meet the overarching objectives for Plan E). For example – retail, employment, housing, the redevelopment of Epsom railway station, open space provision, enhancements to the Market Place and new/ redeveloped community facilities (including places of worship)
- ◆ An implementation monitoring plan, which sets out how each Plan E policy relates to a wider policy objective, who will be responsible for delivering the policy, an indicative timeframe for delivery, indicators and targets/ specific actions
- ◆ An infrastructure delivery plan, which sets the various forms of supporting infrastructure, which will be needed to ensure the delivery of Plan E. The infrastructure delivery plan sets out the various infrastructure schemes, the evidence supporting the need for these schemes, the lead agencies for delivery, cost, timeframe, and any risks and contingencies.

Summary Issues and Interventions

5. Who does this policy document apply to? (name groups, individuals etc.)	6. Where or what do you believe could have a negative impact? Give reasons for this adverse impact.	7. What evidence/data have you used to reach your judgment?	8. Detail actions to be taken to minimize or remove negative impact.	9. Please detail any positive impact this policy document will have.
<p>Plan E Proposed Submission Document – Epsom Town Centre Area Action Plan applies to all existing and potential users of the Town Centre; including residents, visitors, businesses, employees and students.</p> <p>It will apply to all of the equality groups identified by the Council:</p> <ol style="list-style-type: none"> 1. men and women 2. transgender people 3. ethnic minorities, including gypsies and travelers 4. disabled people 5. lesbians, gay men and bisexual people 6. older people (50+) 7. young people (16 – 25) 8. people from different faith groups 	<p>Plan E is a very positive document that actively seeks to reflect the Council's key priorities and core values where relevant; including valuing diversity and equality. Consequently, there are few genuinely negative equality impacts on the identified equality groups.</p> <p>Potential negative impacts have been identified below. These impacts are consequential rather than intended, and mitigation measures have been identified where appropriate.</p> <ol style="list-style-type: none"> 1. Planning policy documents can be complex and as a consequence may not be readily accessible to non-English speakers – such as migrant workers or overseas students. The medium-long term benefits brought by documents such as Plan E may not be readily apparent to the ethnic minority equality group. 2. Whilst Plan E does seek to meet housing needs, it does not specifically seek to meet the housing needs of gypsies and travelers. It is noted that town centres are not necessarily appropriate locations for meeting the housing needs of this target group. Town centre locations favour high density housing developments. These specific needs will be met by another development plan document. 3. Increased vibrancy within the Town Centre may create an intimidating environment for certain members of the disabled person equality group. The managed delivery of accessibility and public realm improvements 	<p>There is currently no quantitative evidence that the identified potential negative impacts will occur (upon implementation of Plan E). These potential impacts have been identified on the basis of historic trends/ inequalities, which in some cases have been noted by the target group themselves as part of Plan E's consultation/ engagement process.</p> <p>For example, some of the target groups have known concerns over access and mobility. Plan E seeks to address issues of accessibility through public realm, pedestrian and cyclist improvements. However, potential improvement schemes may favor one target group(s) over others. Consequently, the design and development of potential improvement schemes will need to take an inclusive overview of potential impacts upon different (and potentially competing) target groups and ensure that mitigation measures are incorporated before the a scheme is implemented.</p>	<p>The identified negative impacts are all minor, and may not even develop as Plan E is implemented. None of the potential impacts are illegal.</p> <p>Plan E will be subject to an annual monitoring process. This will aid in the identification of negative impacts, if they were to arise. Possible mitigation measures include:</p> <ol style="list-style-type: none"> 1. Non-English speaking groups may perceive that the Plan E document is inaccessible to them as it is written in English. Consequently, the medium-long term benefits being delivered through Plan E may not be readily apparent to these groups. The Council provides a translation service for its documents, which may help address this minor impact (should it arise) by providing a brief translated summary of Plan E. 2. Plan E does not seek to meet the specific housing needs of the gypsy and traveler communities. This is a minor impact, which will be fully addressed within other LDF documents – notably the forthcoming Site Allocations Development Plan Document. 3. The potential access issues that may affect certain target groups will largely be addressed through Plan E. However, it will be difficult to address any perceived access impacts caused by Epsom Town centre becoming a busier retail 	<p>Plan E is a very positive document. It actively seeks to reflect the Council's key priorities and core values where relevant; including valuing diversity and equality.</p> <p>One of Plan E's key objectives is to deliver a town centre environment with housing, retail, employment and community infrastructure opportunities that are open and accessible to everyone. Consequently, all equality groups will experience benefits from the adoption and implementation of Plan E.</p> <p>Examples of potential positive impacts include:</p> <ul style="list-style-type: none"> ◆ Plan E seeks to make the Town Centre a more accessible environment for everyone, particularly for pedestrians, cyclists and public transport users – for example Policies E9, E10 and site allocation policies E14 – E16. ◆ Plan E seeks to meet housing needs by delivering both affordable and market housing – for example Policies E2, E14, E15, E16 and E17. ◆ Plan E seeks to provide local employment opportunities for everyone, within a sustainable town centre location – for example Policies E5, E14, E14, E15, E16 and E17. ◆ Plan E seeks to deliver an improved diverse retail offer for the Town, which will cater

	<p>will need to take this into account to minimize any negative impacts. Continued engagement with this equality group is also recommended.</p>		<p>environment. Plan E actively seeks to improve the vitality and viability of Epsom Town Centre, which is an objective consistent with national planning policy (PPS4), regional policy and the Council's Core Strategy (Policy CS14). It would be inappropriate for the Council to actively seek to deliver a less vibrant town centre simply to accommodate any perceived negative impacts.</p>	<p>for the wider community – for example Policies E1, E3, E4, E14, E15, E16 and E17.</p> <ul style="list-style-type: none"> ◆ Plan E seeks to deliver improvements to public/ community infrastructure and services. This potentially includes improvements to open space provision, the railway station, public transport, the fire/ambulance/police services and healthcare provision – for example Policies E6, E14, E15, E16 and E17. ◆ By providing a diverse mix of uses, accessible to everyone, Plan E seeks to make the Town Centre and safer and more secure environment for all potential users – for example the Town Centre visions and Policies E14, E15, E16 and E17. ◆ Plan E will potentially make the Town Centre a safer and secure environment for all equality groups. ◆ Plan E supports the proposals to redevelop and re-provide existing Baptist and United Reformed Church places of worship located within the Town Centre.
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Consultation, Monitoring and Review

10. Detail what consultation has taken place or is planned to take place with staff and/or key persons working on this service/policy/procedure/project.

Plan E has been prepared in accordance with consultation and engagement processes set out within the Council's adopted Statement of Community Involvement. This has involved continuous engagement with the Local Strategic Partnership (LSP - whose members represent target groups), with local businesses and retailers, specialized local interest groups (who represent specific equality groups such as the disabled, elderly and youth interests) and the general public. Through this process, the Council has tried to develop a direct relationship with the identified equality groups, providing them with a conduit through which they can appropriately influence the development of Plan E. The outcomes from the consultation and engagement stages form part of the evidence base that has supported and influenced the development of Plan E's policy content.

The engagement process will continue as part of Plan E's implementation – it will be a living policy document that will be subject to annual monitoring. Continued engagement with target groups will be via the LSP and potentially through the proposed future town centre management regime. Equality groups will also be engaged through the development, management and implementation of the specific improvements (for example – the redevelopment of the railway station) identified within Plan E.

Plan E has also been subject to a formal sustainability appraisal (SA) process, which addressed some aspects of equality and diversity. The SA formed part of the iterative policy development process – informing the development of Plan E.

11. What monitoring arrangements do you propose to put in place for this policy document?

Once Plan E has been through its formal examination in public process and has been adopted by the Council, it will part of the Epsom & Ewell local development framework. Just like the Core Strategy, its policy content will be the subject of a statutory annual monitoring reporting (AMR) process. The AMR is produced by the Planning Policy Team and is reported to the Members of the Planning Policy Sub Committee before being published. The AMR is also returned to the Government Office for their monitoring purposes.

The AMR monitors the success (or otherwise) of policy/ objective delivery through the use of identified indicators. Where a policy has been shown to be unsuccessful, the Council may decide to intervene. This may trigger the need for a partial review of Plan E.

Some elements of Plan E, notably those associated with the delivery of housing are subject to additional monitoring processes.

The Town Centre projects and initiatives referenced within Plan E, such as the Town Centre Management Regime, site specific development briefs and Parking Strategy, are all likely to have their own monitoring regimes; some of these will be closely linked with Plan E's monitoring arrangements (such as the site specific development briefs). Others, such as the Town Centre Management Regime, are more likely to be removed (either completely, or in-part) from the planning process, with monitoring responsibilities falling to the local strategic partnerships and/ or other public/ private sector partners.

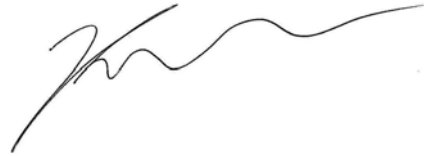
12. Please indicate the next review date and detail any recommendations for action you plan to take as a result of this impact assessment.

The next stage of the process will be witness the submission of Plan E to the Secretary of State (SoS) for examination in public; the timetable is to submit at the end of March 2010. The SoS will appoint an independent Inspector who will assess the soundness of Plan E against the three statutory tests of soundness. The Inspector has the power to make changes to Plan E, if such changes will help make the document sound. The Inspector's report, in which he/ she will identify any changes, is binding upon the Council. The current projected timetable envisages an examination process between April to September/ October 2010. Should Plan successfully pass through the examination process the Council may have an opportunity to adopt before the end of 2010.

Consequently, Plan E's first monitoring period may fall in the final quarter of the 2010/ 11. It is unlikely that there will be sufficient monitoring evidence to warrant intervention prior to 2015.

There are no proposed actions from this impact assessment.

Signature of person completing assessment:



Full name of person completing assessment: **Karol Jakubczyk**

Date assessment was undertaken/ completed: **20 March 2010**

Plan E has been equality impact assessed (EIA) and given the available evidence, it represent a reasonable view of any likely impact and actions intended to mitigate any adverse impact.

Approving/Officer Sign- off: **Irene Clarke** Director of HR & Communications



Signature

Date: **22 March 2010**