

Appendix E



Equality Impact Assessment (EIA)

Name of Policy or Practice	Local Development Plan		
Head of Service responsible for the Policy or Practice	James Harland		
Name of officer (s) completing impact assessment form	Richard Clarke		
Service	Strategic Planning Policy Service	Date of Assessment	October 2013

EIA Completed by :		EIA Agreed by Head of Service :	
Date	October 2013	Date	October 2013
Name(s)	Richard Clarke	Name	James Harland
Signature(s)		Signature	

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? *(Please double click on the box and select ‘checked’ as appropriate to cross X)*

- New and revised policies or practices
- New procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year
- Decisions affecting service users, employees or the wider community
- New project proposals affecting staff, communities or accessibility to the built environment, eg, new construction work or adaptations to existing buildings
- Other please explain in the box below :

2. What are the overall aims and objectives of the policy or practice ?

To provide the Council, as a local planning authority, with an up-to-date planning policy framework for the Plan Area. The Plan Area to which the LDP relates is defined as Conwy County Borough exclusive of the area within the Snowdonia National Park Authority.

This is a master equality impact assessment to identify how the Local Development Plan is taking into account the needs of protected characteristic groups within the community.

The Local Development Plan links into Conwy’s overarching strategic documents:
Community Strategy – One Conwy (priority areas)
Corporate Plan (priority areas)
Strategic Equality Plan (priority areas)
Health, Social Care and Well-Being Strategy (priority areas)
Children and Young People’s Plan (priority areas/aims)
Community Safety Partnership (priority themes)
Local Housing Strategy (vision or main aim)

The main objectives of the LDP are:

1. Ensure the needs of the community are met, whilst at the same time protect the natural and built environment, by promoting adequate and appropriate levels of development, locating development where practicable on previously developed land and primarily in the larger urban coastal settlements and along existing and proposed infrastructure networks, identifying and protecting key environmental assets, and ensuring an efficient density of development compatible with local amenity.
2. To promote the comprehensive regeneration of Colwyn Bay, Abergele, Towyn and Kinmel Bay to broaden economic activity, address social exclusion and reduce deprivation through the Strategic Regeneration Area Initiative
- 3 To provide land to enable an adequate and diverse supply of housing to contribute to needs, including affordable housing for local need, and to meet the need for Gypsies and Travellers, at a scale that is consistent with the ability of different areas and communities to grow.
4. Identify and safeguard adequate land to meet the community's needs for more jobs, greater economic prosperity and reduced out-commuting levels focussing, in particular, on higher value employment opportunities and skills development within and around the strategic hubs of Conwy, Llandudno, Llandudno Junction and Colwyn Bay and the strategic hub of Rhyl, St Asaph and Prestatyn including Kinmel Bay.
5. Encourage the strengthening and diversification of the rural economy that is compatible with the local economy, community and environment.
6. Develop vibrant town centre destinations for shopping, business and commerce, culture, entertainment and leisure through the protection and enhancement of the vitality, viability and attractiveness of Llandudno as the strategic sub regional retail centre, and regeneration of Colwyn Bay town centre and other key shopping centres.
7. Concentrate development along existing and proposed infrastructure networks, and in particular at locations that are convenient for pedestrians, cyclists and public transport.
8. Assist tourism through the protection and enhancement of coastal and rural based tourism attractions and accommodation and further exploit the potential to develop, strengthen and encourage an all year round tourism industry.
9. To encourage efficient patterns of movement and to recognise the strategic role that the A55 and the rail corridors will play in meeting the Borough's development needs, and to give particular attention to development locations that are convenient for pedestrians, walking and cycling in Conwy to aid the reduction of transport CO2 emissions.
10. Ensure that good, sustainable, inclusive design is delivered which includes the opportunity to design out crime, to develop strong, safe and locally distinctive communities and encourage the younger population to remain and return to the area.
11. Reduce energy consumption through the careful siting and design of buildings and the promotion of renewable energy developments where they have prospects of being economically attractive and environmentally and socially acceptable.
12. Safeguard and enhance the character and appearance of the undeveloped coast and countryside, sites of landscape/conservation importance, features of archaeological, historic or architectural interest and ensure the conservation of biodiversity and protected species.
13. To improve accessibility to essential services and facilities, including open space, allotments, health, education and leisure.
14. To promote the prudent use of resources through the minimisation of waste, and assist in providing an integrated network of waste management facilities consistent with the needs of the area and the waste hierarchy.
15. Contribute to regional and local mineral needs in a sustainable manner.
16. Ensure that development supports and sustains the long-term wellbeing of the Welsh language and the character and linguistic

balance of communities within the County Borough.

3. Who is the policy or practice intended to help or benefit (stakeholders) ?

- Council Services – Development Control / Education / Highways / Housing / Regeneration etc
- Public Sector Agencies – Health Boards / Welsh Assembly / Infrastructure Providers
- Developers/ Landowners – Employers / Housebuilders / Retailers / Tourism Operators
- General Public – People making planning applications
- Elected Members

4. Who are the main consultative groups or communities of interest ?

- Public Sector Agencies – Health Boards / Welsh Assembly / Infrastructure Providers
- Developers / Landowners – Employers / Housebuilders / Retailers / Tourism Operators
- Community Groups – Town and Community Councils / Specific Interest Groups / Residents and visitors to Conwy
- Elected Members

STEP 2 - Consider Existing Information and What This Tells You

When completing this section, you need to consider if you have sufficient information with which to complete your EIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions.** This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EIA and you can review the Community Involvement Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you have very little or no information from previous engagement that is relevant to this EIA, you should consider undertaking some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5. What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

The 'Plan Area' to which the LDP relates consists of Conwy County Borough (CCB) excluding Snowdonia National Park Authority (SNPA). Much of the available data covers local authorities in their entirety, or separated into Wards or Community Council areas whose boundaries do not match up with those of SNPA. Unless otherwise stated the following figures are from the 2011 census, with Conwy data including the whole of CCB both inside and outside SNPA. With only 4% of the population of CCB living within the National Park¹ and limited data available specific to the LDP Plan Area, it is considered reasonable to use these figures where necessary to provide an overview of diversity in Conwy.

Protected Group	Relevance of the policy / practice by protected characteristic																																																										
Race	<p>The table below details the ethnic population living in Conwy, Wales & England. Source: Census 2011</p> <table border="1" data-bbox="658 758 1778 1305"> <thead> <tr> <th data-bbox="658 758 1059 866"></th> <th colspan="2" data-bbox="1064 758 1411 866">Conwy</th> <th data-bbox="1415 758 1594 866">Wales</th> <th data-bbox="1599 758 1778 866">England & Wales</th> </tr> <tr> <th data-bbox="658 869 1059 906"></th> <th data-bbox="1064 869 1205 906">Number</th> <th data-bbox="1209 869 1411 906">%</th> <th data-bbox="1415 869 1594 906">%</th> <th data-bbox="1599 869 1778 906">%</th> </tr> </thead> <tbody> <tr> <td data-bbox="658 909 1059 946">All people</td> <td data-bbox="1064 909 1205 946">115,228</td> <td data-bbox="1209 909 1411 946"></td> <td data-bbox="1415 909 1594 946">3,063,456</td> <td data-bbox="1599 909 1778 946">56,075,912</td> </tr> <tr> <td data-bbox="658 949 1059 986">White British</td> <td data-bbox="1064 949 1205 986">109,911</td> <td data-bbox="1209 949 1411 986">95.4%</td> <td data-bbox="1415 949 1594 986">93.2%</td> <td data-bbox="1599 949 1778 986">80.5%</td> </tr> <tr> <td data-bbox="658 989 1059 1026">Gypsy or Irish traveller</td> <td data-bbox="1064 989 1205 1026">65</td> <td data-bbox="1209 989 1411 1026">0.1%</td> <td data-bbox="1415 989 1594 1026">0.1%</td> <td data-bbox="1599 989 1778 1026">0.1%</td> </tr> <tr> <td data-bbox="658 1029 1059 1066">Other white</td> <td data-bbox="1064 1029 1205 1066">2,573</td> <td data-bbox="1209 1029 1411 1066">2.2%</td> <td data-bbox="1415 1029 1594 1066">2.3%</td> <td data-bbox="1599 1029 1778 1066">5.3%</td> </tr> <tr> <td data-bbox="658 1069 1059 1106">Mixed</td> <td data-bbox="1064 1069 1205 1106">894</td> <td data-bbox="1209 1069 1411 1106">0.8%</td> <td data-bbox="1415 1069 1594 1106">1.0%</td> <td data-bbox="1599 1069 1778 1106">2.2%</td> </tr> <tr> <td data-bbox="658 1109 1059 1145">Asian or Asian British</td> <td data-bbox="1064 1109 1205 1145">876</td> <td data-bbox="1209 1109 1411 1145">0.8%</td> <td data-bbox="1415 1109 1594 1145">2.3%</td> <td data-bbox="1599 1109 1778 1145">7.5%</td> </tr> <tr> <td data-bbox="658 1149 1059 1185">Black or black British</td> <td data-bbox="1064 1149 1205 1185">199</td> <td data-bbox="1209 1149 1411 1185">0.2%</td> <td data-bbox="1415 1149 1594 1185">0.6%</td> <td data-bbox="1599 1149 1778 1185">3.3%</td> </tr> <tr> <td data-bbox="658 1189 1059 1225">Chinese</td> <td data-bbox="1064 1189 1205 1225">376</td> <td data-bbox="1209 1189 1411 1225">0.3%</td> <td data-bbox="1415 1189 1594 1225">0.4%</td> <td data-bbox="1599 1189 1778 1225">0.7%</td> </tr> <tr> <td data-bbox="658 1228 1059 1265">Other ethnic group</td> <td data-bbox="1064 1228 1205 1265">334</td> <td data-bbox="1209 1228 1411 1265">0.3%</td> <td data-bbox="1415 1228 1594 1265">0.5%</td> <td data-bbox="1599 1228 1778 1265">1.0%</td> </tr> </tbody> </table> <p data-bbox="629 1345 2101 1441">Conwy has a high proportion of White British residents (95.4%) compared with England and Wales. This indicates that Conwy has a very small ethnic population. The LDP is relevant to this protected characteristic as access to safe and appropriate housing is a basic need for all households. More</p>					Conwy		Wales	England & Wales		Number	%	%	%	All people	115,228		3,063,456	56,075,912	White British	109,911	95.4%	93.2%	80.5%	Gypsy or Irish traveller	65	0.1%	0.1%	0.1%	Other white	2,573	2.2%	2.3%	5.3%	Mixed	894	0.8%	1.0%	2.2%	Asian or Asian British	876	0.8%	2.3%	7.5%	Black or black British	199	0.2%	0.6%	3.3%	Chinese	376	0.3%	0.4%	0.7%	Other ethnic group	334	0.3%	0.5%	1.0%
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specifically, the provision of a site for Gypsy & Traveller accommodation forms part of the Housing Strategy in the LDP, informed by a Gypsy and Traveller Accommodation Needs Assessment.

Disability

The following table details persons living with a limiting long-term illness
Source: Census 2011

	Conwy		Wales	England & Wales
	Number	%	%	%
All people	115,228		3,063,456	56,075,912
Day-to-day activities limited a lot	13,896	12.1%	11.9%	8.5%
Day-to-day activities limited a little	14,019	12.2%	10.8%	9.4%
Day-to-day activities not limited	87,313	75.8%	77.3%	82.1%
Aged 16-64	67,940			
Day-to-day activities limited a lot	5,209	7.7%	8.3%	5.8%
Day-to-day activities limited a little	5,982	8.8%	8.6%	7.2%
Day-to-day activities not limited	56,749	83.5%	83.1%	87.0%

Limiting long term illness data from the 2011 Census is widely used to give an estimate of disability. The term 'limiting long-term illness' covers a self assessment of whether or not a person has a limiting long-term illness, health problem or disability which limits their daily activities or the work they can do, including problems that are due to old age. Of the population aged 16-64, the proportion of Conwy's residents for whom disability limits day-to-day activities is very similar to the Welsh average, although severely limiting disability is lower than the National average. For the population as a whole however, the proportion of both slightly and significantly limiting disabilities amongst the Welsh population is higher than the Welsh average. This is likely to be due to Conwy's high ageing population and relatively small young population, coupled with the level of long-term illness in a population increasing

with age².

The table below details the number of persons living in Conwy with learning, sensory and / or physical disabilities (2011-12).

Source: register of physically / sensory disabled persons; register of persons with learning disabilities, personal social services, Welsh Government

	Conwy	
	Number	%
All people (2011)	115,300	
Sight impaired and / or deaf, and / or physically disabled	355	0.3%
Physical disability only	8,226	7.1%
Deaf and hard of hearing only	30	0.0%
Total placements of persons with learning disability	627	0.5%
Total with any disability	9,238	8.0%

Physical impairments account for the majority of disabilities within Conwy (7.1%). The LDP is relevant to this protected characteristic as access to safe and appropriate housing is a basic need for all households. The Housing Strategy in the LDP seeks to promote a supply of good quality, accessible housing for households with disabled occupants. The statistics above clearly indicate that Conwy's population includes a significant number of residents with disabilities and/or limiting long term illnesses. The LDP will help to ensure that there is a continued supply of suitable adapted properties to meet these identified needs. Additionally, all developments are required to meet Development Principles policies which include requirements for appropriate levels of accessibility to buildings, although this element of building design is mainly controlled by Building regulations, which falls outside the scope of the LDP.

Sex

The table below details the percentage of the population in Conwy who are male or female.

Source: mid-year population estimates, Office for National Statistics

	Conwy		Wales	
	Number*	%**	Number*	%**

Total population	115,300		3,063,800	
Males	55,800	48.4%	1,504,500	49.1%
Females	59,500	51.6%	1,559,300	50.9%

*numbers are rounded to the nearest 100.

**percentage is calculated from unrounded data.

The table below details the male to female ratios for Conwy, Wales & UK.

Source: mid-year population estimates, Office for National Statistics

	Conwy	Wales	UK
Male:female ratio	107	104	103
Aged 0-15	94	95	95
Aged 16-64	103	101	101
Aged 65+	127	124	126
Aged 85+	208	212	208

Definition

Male:female ratio – number of females in the population for every 100 males

Conwy has a slightly higher proportion of female residents than the Welsh average. This may be in part due to the longer life expectancy of females and the high proportion of older people living in Conwy (see below) as well as the out migration of young people, in particular young males. The LDP is relevant to this protected characteristic as the planning policies in the LDP will apply to all age groups.

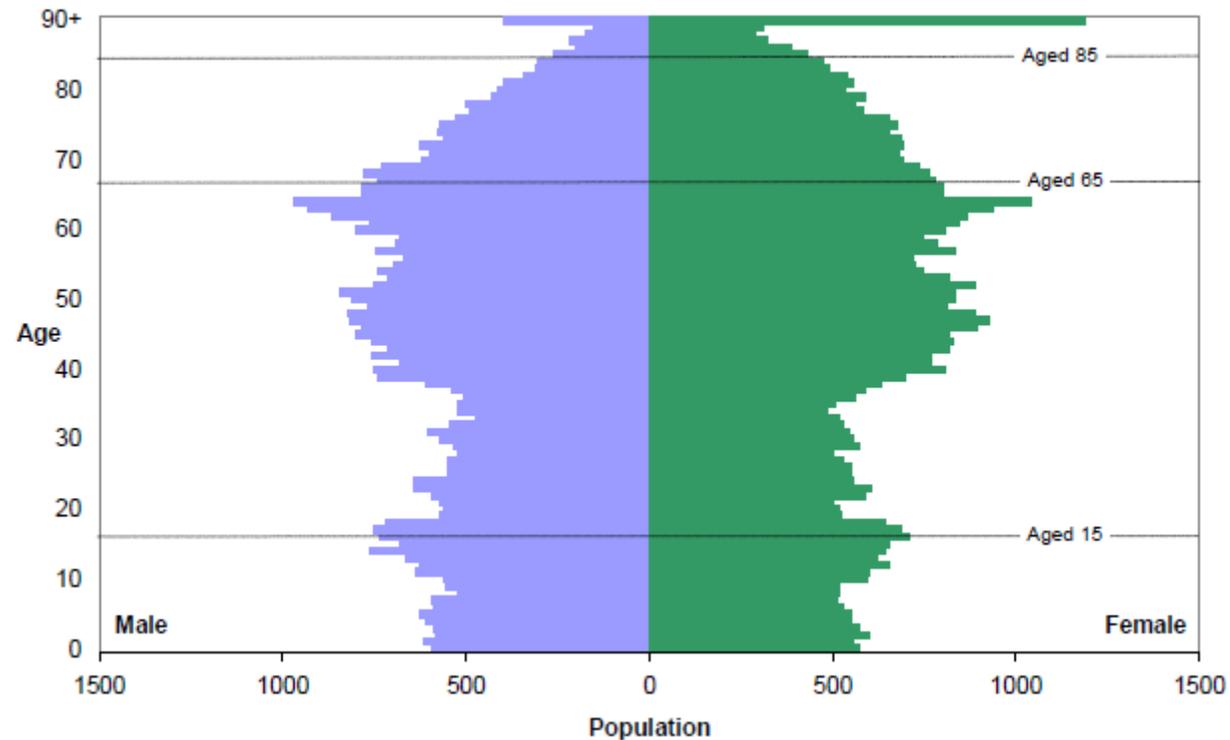
Age

The table and pyramid below detail the age of the population in Conwy, Wales and the UK (2011)

Source: mid-year population estimates, Office for National Statistics

	Conwy	Wales	UK	
All ages	115,300	3,063,800	63,232,600	
0-15	19,100	16.5%	18.1%	18.8%
16-64	67,900	58.9%	63.4%	64.7%

65+	28,400	24.6%	18.5%	16.5%
85+	4,300	3.8%	2.5%	2.2%



Conwy 16.5% of the population aged under 16 compares to 18.1% in Wales as a whole and 18.8% across the UK. In 2011 there were 67,900 people of working age (16-64) in Conwy. This makes up 58.9% of the population, compared to 63.4% in Wales and 64.7% in the UK. The number of people in the working age population group in the County Borough is particularly affected by the out-migration of young adults in the 18-24 age group.

There were 28,400 people aged 65 and over in Conwy in 2011. Conwy's 24.6% of the population aged 65 and over compares to 18.5% in Wales as a whole and 16.5% across the UK. Similar high proportions of the post-retirement age population are only found in areas known to be retirement locations, such as the south west coast of England. The high proportion of elderly within our population also leads to the proportions of children (aged 0-15) and residents of working age (aged

16-65) being significantly below Wales and UK averages. The large proportion of people aged over 65 is mainly due to two factors; firstly improvements in mortality rates mean people are living longer; and secondly the ageing on of the large 'baby boom' cohort born after the Second World War. Very elderly are defined as those in the population aged 85 and over (also included in the 65+ age group). There were 4,300 people aged 85 and over in the County Borough in 2011. Conwy's 3.8% of the population aged 85 and over compares to 2.5% in Wales as a whole and 2.2% across the UK.

Age is relevant to the LDP as the housing strategy in the Plan seeks to supply suitable, accessible and affordable accommodation for all age groups. However the particularly high proportion of older people living in Conwy justifies the development of a housing strategy specifically for older people. The LDP will deliver a range of employment opportunities and encourage employers to upskill and employ locally. This is relevant to people of working age in Conwy, particularly younger people, a large proportion of whom have typically left the area for work. The community facilities section of the LDP will ensure that new housing developments will have adequate open space provision, to benefit young people.

Religion & Belief

The following table details the religion of residents in Conwy (2011)

Source: Census 2011

	Conwy		Wales	England & Wales
	Number	%	%	%
All people	115,228		3,063,456	56,075,912
Christian	74,506	64.7%	57.6%	59.3%
Buddhist	347	0.3%	0.3%	0.4%
Hindu	206	0.2%	0.3%	1.5%
Jewish	62	0.1%	0.1%	0.5%
Muslim	583	0.5%	1.5%	4.8%
Sikh	17	0.0%	0.1%	0.8%
Any other religion	478	0.4%	0.4%	0.4%
No religion	30,017	26.1%	32.1%	25.1%
Religion not stated	9,012	7.8%	7.6%	7.2%

There is a higher proportion of Christians living in Conwy (64.7%) than in Wales or England & Wales.

Sexual Orientation

Statistics about sexual identity are not available at Conwy level. The Integrated Household Survey which is produced by the Office for National Statistics does produce estimates at an all-Wales level, but data are not released for Conwy as they are sample based and not considered robust (the sample size is too small to be representative). These are experimental statistics and so they are not yet fully developed and have not been passed as a National Statistic.

The table below details the sexual identity of the population in Wales & the UK (2011/12).

Source: Integrated Household Survey

	Wales	UK
All people	2,441,400	50,168,500
Heterosexual / straight	94.2%	93.9%
Gay / Lesbian / Bisexual	0.9%	1.5%
Other	0.3%	0.3%
Don't know / refusal	2.9%	3.6%
Non response	1.4%	0.6%

There is no reliable data about the size of the gay, lesbian or bisexual population in the UK. Estimates from various sources range from 0.3% to 10%, but they do not allow for non-reporting or misreporting and so the Equality and Human Rights Commission believe that none of these provide an adequate basis for an estimate. The Department of Trade and Industry gives an official estimate that 5-7% of the British population are gay, lesbian or bisexual.

Gender Reassignment

No data about people who are transgender is currently available at unitary authority or national level. A figure cannot be provided from an administrative source either. The Office for National Statistics (ONS) has undertaken research to assess the feasibility of gathering transgender data, and concluded that, because of its sensitive nature, using a question in a survey to capture this information is not feasible.

Marriage & Civil Partnership

The Table below details the marital status of residents living in Conwy & Wales.
Source: Census 2011

	Conwy		Wales	
	Number	%	Number	%
All Usual Residents Aged 16 and Over	96102		2507160	
Single (Never Married or Never Registered a Same-Sex Civil Partnership)	27729	28.9	840347	33.5
Married	46379	48.3	1167315	46.6
In a Registered Same-Sex Civil Partnership	197	0.2	4654	0.2
Separated (but Still Legally Married or Still Legally in a Same-Sex Civil Partnership)	2229	2.3	54686	2.2
Divorced or Formerly in a Same-Sex Civil Partnership which is Now Legally Dissolved	10215	10.6	242193	9.7
Widowed or Surviving Partner from a Same-Sex Civil Partnership	9353	9.7	197965	7.9

Conwy has a slightly higher proportion of married couples (48.3%) compared with Wales (46.6%), and a lower proportion of single people. This may be in part due to the lower proportion of younger people in Conwy in comparison to the National average.

Pregnancy & Maternity

No data.

Welsh Language

Residents who are able to speak Welsh account for 19% of the total population in Wales, whilst this figure rises to 27.4% in Conwy CB. Towyn and Kinnel Bay are the areas with fewest Welsh Speakers (less than 12%) whilst in Llanrwst and the rural areas to the south and east of here Welsh is more prominent, rising to 71% of residents of Uwchaled speaking Welsh³.

The table below details knowledge of Welsh (2011).
Source: Census 2011

	Conwy		Wales
	Number	%	%
All aged 3+	111,724		2,955,841
No knowledge of Welsh	67,716	60.6%	73.3%

Understands spoken Welsh only	10,655	9.5%	5.3%
All Welsh speakers	30,600	27.4%	19.0%
Speaks but neither reads nor writes Welsh	4,603	4.1%	2.7%
Speaks and reads but cannot write Welsh	2,706	2.4%	1.5%
Speaks, reads and writes Welsh	23,063	20.6%	14.6%
Other combination of skills	2,981	2.7%	2.5%

The table below details Welsh speakers by age in Conwy & Wales (2011).

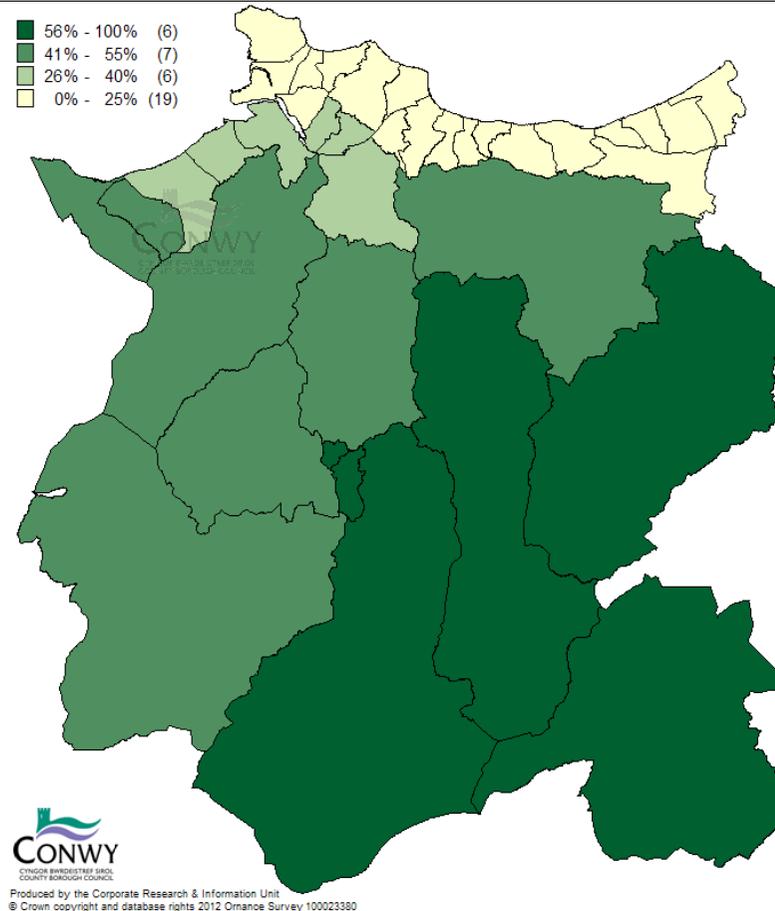
Source: Census 2011

	Conwy			Wales		
	Total	Speak Welsh	% Speak Welsh	Total	Speak Welsh	% Speak Welsh
All aged 3+	111,724	30,600	27.4%	2,955,841	562,016	19.0%
3 - 4	2,335	740	31.7%	70,686	16,495	23.3%
5 - 15	13,287	6,539	49.2%	377,995	152,255	40.3%
16 - 19	5,239	1,953	37.3%	161,952	43,651	27.0%
20 - 44	30,281	8,420	27.8%	968,546	150,742	15.6%
45 - 64	32,420	6,703	20.7%	814,118	107,941	13.3%
65 - 74	13,966	2,936	21.0%	300,550	45,112	15.0%
75+	14,196	3,309	23.3%	261,994	45,820	17.5%

The ability to speak Welsh is most prevalent amongst those of school age; 49.2% of 5-15 year olds can speak Welsh in Conwy, compared with 40.3% in Wales.

The following map details the proportion of Welsh speakers in Conwy by ward.

Source: Census 2011 table



In general, the incidence of Welsh speakers' increases towards the west, and as one travels inland from the more highly populated coastal strip. Ability to speak Welsh is at a peak in the rural southern ward of Uwchaled (71% Welsh speaking), and at its lowest in the eastern coastal community of Towyn & Kinmel Bay (less than 12%).

The LDP is relevant to this protected characteristic as National Planning Guidance Technical Advice Note (TAN) 20⁴ requires local authorities to give consideration to the Welsh Language both when producing development plans and making planning decisions. Protecting the Welsh language is a recognised priority within the LDP. The LDP recognises the difficulties faced by many households

	<p>from rural areas who are struggling to afford a home within their local communities. The LDP seeks to support the supply of Affordable Housing to meet Local Need (AHLN) living in rural areas, in order to protect the Welsh language in these communities, however it is unlawful to positively discriminate in favour of Welsh speakers when providing AHLN and conditions cannot be imposed on planning permissions to this extent.</p> <p>As part of the LDP Process, the Welsh Language Impact Assessment Background Paper⁵ has been produced, with the involvement of Menter Iaith and the Welsh Language Board (now Welsh Language Commissioner) to inform Policy development. This is mainly based on census data up to and including the 2001 census, as sufficient data from the 2011 census was not available at the time of the LDP Examination. Also, at this time the final TAN20 had not been published although a draft version was used for Examination purposes. As the LDP is monitored and reviewed, updates to census data and National Guidance will be taken into account.</p>
Other (please state)	

6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information	Examples
<p>Public consultations have taken place at several points throughout the LDP process, which have enabled members of the public and organisations to comment on the proposals. Approximately 17,600 representations, made by 5000 representors have been received over the course of the LDP development, indicating a high degree of engagement with the local population. Relevant bodies and anyone who had previously been involved in the LDP process were contacted individually by bilingual letter (Welsh/English). The consultations were also advertised more broadly to other interested parties by public notice in local newspapers and, when appropriate, in the CCBC Bulletin delivered to all households in Conwy.</p> <p>When potential development sites were being consulted on, site notices were also posted in appropriate places to make passers by and local people aware that the site was being considered. Neighbouring properties were also informed by letter at the Deposit stage of the LDP. Additionally, consultation events took place in a range of accessible locations across Conwy to allow residents to speak to Officers about the proposals. The extent of consultation and public involvement undertaken for the LDP is detailed in the Statement of Consultation⁶, Addendum to the Statement of Consultation⁷ and Delivery Agreement⁸. The public consultation processes were followed in accordance with the LDP regulations, as determined by the</p>	<p>Initial EIA Screening Complaints Compliments Service User data Service User Feedback Inspections or Audits</p>

Inspectors at Public Examination.

Amongst the groups contacted as part of the LDP consultation, some of those relevant to the Equalities Impact Assessment were:

- Equality and Human Rights Commission, Cardiff
- Gypsy Council
- North Wales Race Equality Network
- Commission for Racial Equality
- Conwy Access Group
- Disability Wales
- Conwy Children's and Young People's Partnership
- CCBC Education
- National Playing Fields Association
- The Welsh Language Commissioner/Board
- The Welsh Language Society
- Menter Iaith Conwy
- CCBC Housing
- Shelter
- Conwy rural Housing enabler
- Country Landowners Association
- National Farmers Union
- Farmers Associations, Llanddoged, Ruthin
- Community and Town Councils in all areas

Amongst the representations received, key comments that were equalities related included:

- Access to housing – in particular, local people concerned that they are being priced out of the local housing market. By identifying housing sites in the LDP to meet the overall housing need and in particular provision of Affordable Housing for Local Need, the LDP seeks to help meet the Council's Corporate Plan objectives by providing safe and appropriate housing.
- The Welsh Language – comments were received from Menter Iaith and the Welsh Language Society as well as other individual representors raising concerns about the impact of development on the Welsh Language. Both organisations attended the LDP Examination to discuss the Council's LDP strategy relating to the Welsh Language.

<ul style="list-style-type: none"> • Race – provision of an appropriate site for Gypsies and travellers. Comments have been received both in favour of and objecting to the Council providing a site. Extensive research has been conducted to assess the needs of the Gypsies and travellers. Additionally, a local resident with a wealth of knowledge and experience of working with the Gypsy and traveller community has offered to assist the Council in future consultation and delivery of site(s). 	
<p>Research or Comparative Information</p>	<p>Examples</p>
<p>Housing, and provision of Affordable Housing for Local Need (AHLN) forms an important part of the LDP, with projected growth in population stimulating economic growth and requiring additional housing sites. The delivery of the Housing Strategy of the LDP will be informed by the Conwy Local Housing Strategy (2013-2018)⁹, with the requirements for type and size of dwellings required, both AHLN and open market, being defined by the Local Housing Market Assessment; a revision of which is presently underway. The LHS has been subject to separate EqIA by CCBC Housing Strategy Service, including extensive consultation. Colleagues from Housing Strategy have also assisted with the formulation of Affordable Housing Policies and were present at the LDP Examination. Complementing the LHMA, the Older Person’s Housing Strategy has been produced to identify the particular needs of older people within Conwy.</p> <p>The Gypsy and Traveller Accommodation Needs Assessment (GTANA) was undertaken in partnership with other North Wales local authorities and Bangor University to identify the number of type of sites that are required across the region as a whole to meet the needs of Gypsies and Travellers. The completed report¹⁰ (yet to be approved by all North Wales authorities) has been released during the LDP Examination to inform development of an appropriate Policy. The report, based on a range of primary data including interviews and questionnaires finds a need for three residential pitches in Conwy CB and a transit site, ideally close to the Conwy/Denbighshire border, although this site could be located within either authority. The LDP Policy HOU/9 commits the Council to seeking planning permission for a site by September 2014. A call for sites has now been undertaken, with landowners having been asked to submit potential sites within Conwy to meet the need and approximately 30 sites have been submitted. Their suitability is now being assessed. Future work with the Gypsy and Traveller community will also be assisted by a local resident who has extensive knowledge and experience of working with these groups. Further research to assess the site needs for Travelling Showpeople is now being undertaken.</p> <p>Planning Policy Officers have attended Conwy Access Group to present the LDP and gain feedback from the Group on the proposed policies and the extent to which the Access Group’s concerns regarding developments are being addressed. The strong message gained from this session was that the Group felt they should be more involved at planning application stage, to discuss options with Planning Officers.</p>	<p>Service User Surveys Studies by Government departments or professional bodies Census data Service based projects and research How Fair Is Wales (EHRC data)</p>

Additionally, concerns were raised about access at specific locations which are beyond the remit of the Local Development Plan, but any proposals to improve these situations would be considered favourably by the proposed LDP policies. There were no specific issues raised regarding the LDP Policies however following this meeting it was considered appropriate to make amendments to the Development Principles to give more weight to access considerations in determining applications. Access to developments is primarily looked after by Building Control, with the regulations falling outside planning however there is scope for Planning Officers to seek improved design where appropriate. Development Management officers are soon to be undertaking training to improve their engagement with Conwy Access Group.

The Welsh Language has been the subject of a detailed background paper⁵ which has been informed by census information and consultation with relevant organisations. The LDP Policy CTH/5 which aims to sustain and support the Welsh Language in the long term has been subject to public consultation and extensive discussion at the LDP Examination session relating to the Welsh Language. The policy was written to meet the requirements of both the adopted June 2000 and the 2011 draft TAN20 as the final version had not been published at this time. The draft version was the most up to date piece of National Guidance at that time, although it was recognised that it was subject to change. The Inspector agreed that this was an appropriate way in which to interpret National Guidance and allowed for a further hearing session on the Welsh Language if the final version was published prior to the end of the LDP Examination. An SPG on the Welsh Language has also been produced, taking on board comments received from consultations with relevant organisations and the public. This will be subject to further revision and consultation prior to adoption but will in the future provide additional guidance on how developments should be designed to encourage the use of the Welsh Language. Three particular areas (Abergele, Llanrwst and Dolgarrog) have been identified which are most at risk of having use of the Welsh language affected by development and development here will be required to demonstrate how the proposals take the Welsh Language into account. All large employment and housing developments on unallocated sites will also be required to provide an assessment of their proposals on the Welsh Language.

7. Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?

Yes No **(please cross as appropriate X)** If Yes, please proceed to Step 3

If No, you may wish to consider pausing at this point while you undertake engagement activities (which you should add to your action plan – Step 6). Please incorporate any information you have obtained from this additional activity in the box below and state what the key findings were :

STEP 3 - Procurement and Partnerships

The public sector General Duty means all public authorities need to consider the needs of different groups when designing and delivering public services. This duty also applies to private sector organisations who deliver a public function on our behalf and we need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty.

8. Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes No *(please cross as appropriate X)* If No, please proceed to Step 4

9. If yes, how will you comply with Equality, Human Rights and Welsh Language Legislation? Think about :

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation
- On what you based your decisions in the award process
- That contract clauses cover legislative equality requirements
- Performance and Monitoring measures are included to monitor compliance

Partnerships

Who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessment
- Delivering the actions from the EIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners

The majority of the work delivering the LDP will be conducted internally, through Officers in Planning and elsewhere within the authority as appropriate. Some elements of the LDP delivery such as where further research is required, will be undertaken by consultants working on behalf of the Council. All such consultants will be required to demonstrate they meet or exceed the necessary equality requirements.

STEP 4 - Assessing the Impact

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

Evidence received from monitoring of consultation periods indicates a higher response rate from older people (also see below). Interest in and participation from the community in LDP consultation periods has always been dependent on people who have a interest in the outcome of the LDP, whether this be landowners, agents, local residents or statutory bodies.

11. Does the geography or demography of any groups reveal anything?

The geography of participants in the LDP process is in general terms related to the location of development proposals in the LDP. Those living close to potential development sites are the most likely to make representations against developments. In addition, petitions based on specific local concerns skew the results of consultations in terms of overall numbers. In particular, residents of Abergele, Llandudno and Dwygyfylchi have made high numbers of representations owing to petitions against developments in these locations. For example, of the 5000 representors, approximately 1600 made representations under the name of the Abergele Action Group. The majority of these were from the Abergele area, although a small number were from other parts of Conwy, in other north Wales authorities or even further afield; some representors were from places as distant as London, Glasgow and Yeovil (Somerset).

Attendance at consultation events demonstrated an interest in the LDP from a range of age groups, with representors being between teenage and at least eighties. There was a greater participation at consultation events by the slightly older population (50+) than younger. This may be in part due to time available, with the older and particularly retired population having more time to attend such events in comparison with school or working age people. Also, it is possible that younger people who have had an interest in the LDP have been better able to find the information through the LDP website. Whilst the proportion of the older population online is increasing, there is a far greater likelihood of younger people being online than older (only approx. 70% of adults aged 65-74 and 30% of aged 75 and over have ever used the internet, compared to 99% of persons aged 16-44)¹¹. Therefore the consultation events and paper copies available at libraries and council offices may have formed a more valuable resource for older people than younger people. Older people have traditionally been more involved in local affairs than younger people, however the Conwy LDP attempted to help redress this balance by producing a 'Youth Friendly' LDP which summarised the key LDP issues in an easier-to-read format. Copies of this were distributed to local schools and Education Services. They were also made available through the LDP website, Council offices and libraries.

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

Throughout the LDP development process, every effort has been made to engage residents of Conwy CB in the LDP process without creating barriers to prevent people becoming involved. The consultations have been undertaken to meet or exceed the requirements of the LDP Regulations, as detailed in the Delivery Agreement and Statement of Consultation. During consultation periods, documents have been provided in accessible locations at main Council offices and all libraries (including the mobile library). It is appreciated that the opening times of these locations will not be convenient for all residents, however documents have also been available via the LDP website and on CD. Home visits have also been offered should anyone be unable to view the documents by one of these means, for example a person who may be housebound with poor/no internet connection.

The LDP consultation periods were advertised in both Welsh and English in local newspapers and documents were also published bilingually. During the LDP Examination, all participants were free to use Welsh or English. In practice, due to the preference of participants, most of the LDP hearing sessions were held in English with the exception of one relating to the Welsh Language. Translation facilities were provided at all sessions should they be required. In case documents, or relevant sections, were required in alternative languages or formats (including Braille) this was offered through the Big Word.

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

N/A

14. Do any of these limitations amount to unlawful discrimination?

Yes No Not Sure
(please cross as appropriate X)

15. If you answered No to Question 14, do the barriers and limitations amount to a differential impact for certain groups?

Yes No Not Sure
(please cross as appropriate X)

16. If you answered Yes or Not Sure to Question 15, please give details in the box below and explain why

Some documents submitted to the Examination were available only in English. These were primarily either those documents written by third parties, who were free to submit documents in either English or Welsh, or those that were produced over the course of the Examination to provide additional information to the Inspectors. Owing to short timescales required by the hearing sessions, translation of these documents was not always possible and these documents were to provide information for the Inspectors, not for public comment or consultation. Should anyone require one of these documents in a different format or language, this can be provided as with the other documents. It is not considered that this impacted on the ability of Welsh speaking communities to take part in public consultations or the LDP process in general.

17. Do you have enough information to make an informed judgement?

Yes No **(please cross as appropriate X)**

If you answered Yes, please justify:

As detailed in 12 above, a range of methods have been employed to engage as many people as possible in the LDP process and providing equal opportunities for involvement. The LDP will be delivered in partnership with other services within the Council, the strategies for which have been, or will be subject to individual Equalities Impact Assessment where appropriate. In particular, the LDP's Housing Strategy is informed by the Local Housing Strategy, produced by colleagues in Regulatory Services. Policies in this section include provision of market and affordable housing as well as a site for Gypsies and Travellers.

If you answered No, what information do you require about protected groups?

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:

The LDP's Implementation and Monitoring Plan includes requirements to conduct further research. The amount of information available to inform the LDP will continue to increase. Ongoing research, information and guidance will inform changes to the LDP at annual reviews. Examples include the Local Housing Market Assessment which is underway, updated census data, changes to National Guidance which will potentially mean amendments to the LDP strategy to take into account the latest evidence.

STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

The LDP contains policies designed to minimise adverse impacts or disadvantages to equality groups, including:

- Ensure developments are consistent with the human rights of residents, through the LDP's development principles
- Increasing the supply and access to suitable affordable housing
- Provision of an increased level of open space within new residential developments, of particular benefit to young people and families, with additional allotment provision also having health benefits
- Amendments to policies to ensure that development is designed to be accessible and provides for people of different ages and abilities
- Require the Council to find a suitable site for provision of Gypsy & Traveller accommodation
- Support new and improved education provision
- Ensure that new developments support the long-term viability of the Welsh Language

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

None

21. What actions could you take to achieve the same goal by an alternative means?

None

STEP 6 – Action Plan

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

Action	Measure of Success	Timeframe	Lead Responsibility	Add to Service Plan (✓)
Actions to be taken before EIA and policy/practice can be signed off				
LDP adopted by Council	LDP adopted	October 2013		
Actions after EIA and policy/practice signed off				
Collect additional equalities monitoring data	Responses received	By December 2013	Richard Clarke	
Complete research for the accommodation needs of Travelling Showpeople	Complete study	Within 12 months of LDP adoption	Terry Stevens	✓
Identify and gain permission for Gypsy & Traveller Site	Gain planning permission for a site	By January 2015	Terry Stevens	✓
Complete Welsh Language & Culture SPG	Adopt SPG	By April 2014	Ian Stevens	✓
Complete Affordable Housing SPG	Adopt SPG	Within 12 months of LDP adoption	Ian Stevens	✓
Complete Parking Standards SPG	Adopt SPG	By February 2014	Lindsay Mercer	✓
Complete Planning Obligations SPG	Adopt SPG	By February 2014	Carol Evans	✓

STEP 7 – Decision To Proceed

22. Using the information you have gathered in steps 1 – 5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(please cross as appropriate X)

Decision		Action
<input type="checkbox"/> Yes	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
<input checked="" type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
<input type="checkbox"/> No	Abandon this policy or practice as it is not possible to address the adverse impact, and consider alternative ways of addressing the issues	Complete Action Plan to address any issues resulting from abandoning policy and to deal with the adverse impact identified

STEP 8 – Arrangements for Monitoring Outcomes and Reviewing Data

The EIA process is an ongoing one that doesn't end when the policy/practice and EIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced this new policy or practice.

23. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice :

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)
Annual Monitoring of the LDP Appendix 2 of the LDP includes a suite of indicators that will be used to monitor the success of the LDP.	Annually following the first full financial year after adoption of the LDP	James Harland	✓
Full Plan Review A more in-depth review of the outcomes of the LDP, relative. The success of the policies will be considered in light of new evidence, National guidance and census data.	After four full years following adoption	James Harland	✓

STEP 9 – Publishing the Equality Impact Assessment

Please arrange for this completed EIA to be agreed by your Head of Service, refer to the EIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.

REFERENCES

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- ¹ CCBC (2012) *An area profile for Conwy County Borough (5th Edition)*. Available from: <http://www.conwy.gov.uk/doc.asp?cat=7915&doc=1960>
- ² Equality & Human Rights Commission (2011) *How fair is Wales?* Available from: <http://www.equalityhumanrights.com/wales/library/how-fair-is-wales/>
- ³ CCBC (2013) *The Welsh language in Conwy County Borough - Research bulletin*. Available from: <http://www.conwy.gov.uk/sectionextra.asp?cat=10798&Language=1>
- ⁴ Welsh Government (2013) *Technical Advice Note (TAN) 20: Planning and the Welsh Language*. Available from: <http://wales.gov.uk/topics/planning/policy/tans/planning-and-the-welsh-language/?lang=en>
- ⁵ CCBC (2012) *Welsh Language Impact Assessment* (LDP Examination Library Reference: EB033) Available from: <http://www.conwy.gov.uk/doc.asp?cat=8705&doc=28215&Language=1>
- ⁶ CCBC (2011) *Statement of Consultation* (LDP Examination Library Reference: LDP025) Available from: <http://www.conwy.gov.uk/doc.asp?cat=10257&doc=31872&Language=1>
- ⁷ CCBC (2012) *Addendum to Statement of Consultation* (LDP Examination Library Reference: LDP026) Available from: <http://www.conwy.gov.uk/doc.asp?cat=10273&doc=31912&Language=1>
- ⁸ CCBC (2012) *Conwy LDP Delivery Agreement* (LDP Examination Library Reference: LDP032) Available from: <http://www.conwy.gov.uk/doc.asp?cat=10273&doc=31912&Language=1>
- ⁹ CCBC (2013) *Local Housing Strategy (2013 – 2018)* Available from: <http://www.conwy.gov.uk/doc.asp?cat=8349&doc=27493&Language=1>
- ¹⁰ Hirst & Crew (2013) *Draft Gypsy and Traveller Accommodation Needs Assessment* (LDP Examination Library Reference: HS04a 01) Available from: <http://www.conwy.gov.uk/doc.asp?cat=10516&doc=32539&Language=1>
- ¹¹ ONS (2013) *Internet Access Quarterly Update, Q2 2013* Available from: <http://www.ons.gov.uk/ons/rel/rdit2/internet-access-quarterly-update/q2-2013/stb-ia-q2-2013.html>