

# Wiltshire & Swindon Aggregate Minerals Site Allocations DPD – Submission Draft Equality Impact Assessment

## Stage 1: Screening for Relevance

**Name of the Strategy / Policy / Procedure / Practice**

Wiltshire & Swindon Aggregate Minerals Site Allocations Local Plan - Submission Draft

**Author:**

Wiltshire Council & Swindon Borough Council

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**Does the strategy / policy / procedure / practice require an equality impact assessment (EIA)?**

Please answer the following questions.

**1. What are the main aims, purpose and outcomes of the strategy / policy / procedure / practice and how do these fit in with the wider aims of the organisation?**

The Submission draft Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan (formerly referred to as a DPD<sup>1</sup>) (“the draft Plan”) builds upon the adopted Wiltshire and Swindon minerals policy framework; and sets out a schedule of proposed minerals sites to meet a locally derived forecast requirement for minerals provision over the period to 2026.

The proposed site allocations represent the councils’ ‘preferred locations’ for mineral extraction having assessed all reasonable alternative options. They have been identified through an iterative and detailed process of site selection and appraisal – i.e. sustainability appraisal (SA, incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive).

Throughout the process of preparing the draft Plan, the councils have applied the policies of their respective Statements of Community Involvement (SCI) and rigorous appraisal techniques (e.g. the sustainability appraisal). The policies of the SCIs in particular seek to ensure that all community engagement and consultation processes are fully inclusive, targeting groups such as:

- People with disabilities;
- Children and young people;
- 25-40 year olds (especially those in fulltime employment);
- Lone parents;
- Those who don’t speak English as their first language;
- Older people;
- Black and ethnic people;

<sup>1</sup> In accordance with the provisions of the new plan making regulations and the National Planning Policy Framework, all councils will be preparing Local Plans rather than the previously titled Development Plan Documents.

- Gypsies, Travellers and canal dwellers;
- The military;
- Isolated rural people and community groups;
- Residents who work outside Wiltshire;
- People who work in Wiltshire but live elsewhere.

Once adopted, the draft Plan will form part of the development plan for the area and, as such, be incorporated into the councils' statutory policy frameworks.

## **2. How will these aims affect our statutory duty to:**

1. Promote equality of opportunity?
2. Eliminate discrimination and harassment?
3. Promote good community relations and positive attitudes towards disabled people?
4. Encourage participation of disabled people, including the consideration of more favourable treatment of disabled people?
5. Protect and promote human rights?

The draft Plan has been prepared through an inclusive process, as outlined above. To this extent, and bearing in mind the scope of the draft Plan, the aims of the document are not considered to adversely impact on our statutory duties in relation to equality and diversity.

1. The draft Plan presents a schedule of proposed sites for the winning and working of sand and gravel in specific locations in Wiltshire and Swindon (the plan area). The document does not favour any specific company within the minerals industry, nor does it seek to discriminate or limit the potential for competition in the minerals industry.

2. The draft Plan has been influenced by a robust appraisal process. The Sustainability Appraisal (incorporating the requirements of the SEA Directive) presents a range of factors that seek to ensure that the proposals presented within the draft Plan are sound. Although the appraisal process does not explicitly refer to issues such as harassment and discrimination, it does however seek to ensure that the proposals for mineral working do not lead to environmental harm or adverse impacts on local communities. In this sense, we believe that any subsequent detailed proposals for mineral working must accord with the Development Plan (and all relevant minerals policies) and thereby design out impacts on local communities.

3. The draft Plan has been prepared through an iterative process of appraisal, engagement and consultation. The SA/SEA process presents a rigorous approach to the management / mitigation of environmental impacts. In addition, the draft Plan should be read within the context of the extant (adopted) policy framework. In this sense, the Minerals Core Strategy and Minerals Development Control Policies DPD<sup>2</sup> present a clear policy approach to reducing and mitigating the environmental effects of mineral working/operations, particularly in relation to sites and operations that interface with local communities.

4. The draft Plan does not actively promote ways in which disabled people can utilise the proposed site allocations during working or after use. The reason for this is simply because the document doesn't positively discriminate; nor does it present detailed design aspects that may assist disabled access. Detailed design aspects within each site will be matters for subsequent planning applications. It is also not common place for working minerals sites/mineral activities to be particularly accessible to the public. Restoration schemes can and do offer opportunities for public access and such issues will need to be addressed through any subsequent planning application process.

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<sup>2</sup> The Mineral Core Strategy and Minerals Development Control Policies documents were prepared prior to the inception of the new plan making arrangements and hence retain their title as "Development Plan Documents (DPDs)".

5. The draft Plan has been prepared and challenged within the context of Sustainability Appraisal (SA). The SA framework presents a range of social criteria against which the proposed site allocations have been assessed. The promotion and protection of human rights does not form an explicit aspect of the appraisal and plan making processes. However, these processes are geared towards the protection of human health and the protection of the environment, which are factors that influence aspects of our basic human rights.

**3. Are there any aspects of the strategy / policy / procedure / practice, including how it is delivered, or accessed, that could contribute to inequality? This should relate to all areas of our statutory duties.**

The document has been designed to ensure that all proposed sites (and uses) will not lead to adverse impacts on local communities or the wider environment. Each site and proposal outlines the boundary of the site and the spatial extent to which any submitted planning application will need to conform to. It details any issues with the site that any applicant will be required to address through a planning application and also details required mitigation and restoration objectives. The proposals present the detail necessary to guide the preparation of any subsequent planning application. It will be for the planning application process to ensure that all detailed design aspects of each proposal are delivered in a manner which does not lead to inequality, but instead maximises opportunity for inclusion wherever appropriate.

**4. Will the strategy / policy / procedure / practice have an impact (positive or negative) upon the lives of people, including members of particular communities and groups? What evidence do you have for this?**

The draft Plan has been fully appraised for potential impacts on local communities and particular land uses. Direct positive impacts are difficult to quantify, because the draft Plan does not specifically state what the potential minerals extraction will look like or what restoration will definitely provide following minerals extraction. Each site proposal is classified as a 'preferred location'; and therefore any application submitted in relation to the site will present the detail. For certain sites, the after uses proposed could present opportunity for people to access the site following restoration, particularly those type of after uses that would expect public interaction.

There is the potential for mineral working, as with all forms of development, to lead to negative impacts on local communities, individuals and businesses. Where such impacts could arise, the draft Plan highlights key issues that will require addressing through any planning application. However, the degree to which such impacts manifest will be a matter for detailed control at the planning application / post-permission stage.

Through the recently concluded pre-submission consultation exercise, a number of comments relating to impacts on communities were raised and a number of proposed alterations to site profiles were suggested. These proposed changes were reviewed and have been submitted alongside the draft Plan as proposed modifications to be considered through the Examination process.

**5. Are particular communities or groups likely to have different needs, experiences and attitudes in relation to the strategy / policy / procedure / practice?**

The draft Plan does not present a level of detail to determine the precise needs of the users of proposed minerals sites or those needs associated with any potential restoration after use. However, the draft Plan does highlight key issues that may have a detrimental impact on the experiences and attitudes of those living and working in proximity to any mineral working and which will need addressing/mitigation at the planning application stage in order to improve the experience and attitudes of those living and working in proximity to the site.

The draft Plan does present opportunity for the Minerals industry. To this extent, it will be for the detailed planning application process to consider the needs of user groups, where this is appropriate to the development in question. It will not always be appropriate for communities or groups to have access to active mineral workings or to particular restoration/after uses, but this does not mean that the draft

Plan should be considered as limiting equality of choice.

**Is an EIA required?**

If the policy is not relevant to any aspect of the statutory duties or wider equality responsibilities, there is no need to conduct an EIA. **In this event, please contact the Corporate Equality and Diversity team to discuss this decision**

Remember:

‘High’ relevance will have potential / actual impact on 3 out of the 5 areas under the statutory duties

‘Medium’ relevance will have potential / actual impact on 2 of the areas

‘Low’ relevance policies will not have any impact relating to the areas under the statutory duties

The strategy / policy / procedure / practice is assessed as (please delete appropriately):

- LOW relevance. However, in the interests of ensuring all relevant documents have been appropriately scoped and screened for potential equality and diversity impacts, a full EIA will be prepared (at the point the draft DPD is submitted for independent examination).

*NOTE:*

*At the submission stage of Plan preparation, the Planning Inspectorate requires an Equalities Impact Assessment to be completed and presented along with the councils’ evidence.*

**Author of Screening for Relevance**

|                        |  |                |   |
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## Stage 2: Full Assessment

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### Step 1– scoping the equality impact assessment (EIA)

Building on the material included at the screening stage, you should begin the EIA by determining its scope. The EIA should consider the impact or likely impact of the policy in relation to all areas of our remit, including human rights. The EIA should be proportionate to the significance and coverage of the policy.

|   |
|---|
| <b>1.1. Name of the strategy / policy / procedure / practice</b>  |
| Wiltshire & Swindon Aggregate Minerals Site Allocations Local Plan - Submission Draft   |
| <b>1.2. What are the main aims, purpose and outcomes of strategy / policy / procedure / practice and how does it fit in with the wider aims of the organisation?</b>  |
| <p>The Submission draft Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan (formerly referred to as a DPD<sup>3</sup>) (“the draft Plan”) builds upon the adopted Wiltshire and Swindon minerals policy framework; and sets out a schedule of proposed minerals sites to meet a locally derived forecast requirement for minerals provision over the period to 2026.</p> <p>The proposed site allocations represent the councils’ ‘preferred locations’ for mineral extraction having assessed all reasonable alternative options. They have been identified through an iterative and detailed process of site selection and appraisal – i.e. sustainability appraisal (SA, incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive).</p> <p>The draft Plan will, once adopted, form part of the councils’ statutory planning policy framework. The councils are committed to ensuring that planning policy documents are prepared in accordance with statutory provisions and good practice in relation to issues associated with inclusivity and equality.</p>   |
| <b>1.3. List the main activities relating to the strategy / policy / procedure / practice and identify who is likely to benefit from it</b>   |
| <p>The draft Plan presents a schedule of 7 proposed sites for future sand and gravel quarries. The document has been designed to: a) provide security to the minerals industry and local communities as to where new quarries will be located; b) guide potential minerals operators as to what issues will need to be addressed should a planning application be submitted at one of the locations within the draft Plan. It also offers the councils (as Minerals Planning Authorities) assurances on the future supply of mineral to meet the locally derived forecast provision rates<sup>4</sup>.</p> <p>Furthermore, the draft Plan also proposes preferred restoration objectives for each site – developed through dialogue with key bodies and the minerals industry and through consultation. The document sets the context for outcomes rather than formally delivering detailed proposals.</p> <p>In terms of process, the draft Plan has been prepared in accordance with statutory provisions; in conformity with requirements published through the National Planning Policy Framework (NPPF); and in the spirit of the duty to co-operate, and in accordance with local policy (the councils’ respective Statements of Community Involvement) and the requirements of an iterative sustainability appraisal (SA).</p> |

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<sup>3</sup> In accordance with the provisions of the new plan making regulations and the National Planning Policy Framework, all councils will be preparing Local Plans rather than the previously titled Development Plan Documents.

<sup>4</sup> The councils have presented evidence to the fact that the current sub-regional forecast provision rates for aggregates provision from Wiltshire and Swindon are too high. The councils are proposing a rate of 1.2 million tonnes per annum over the period up to 2026.

The principle benefits accrued from the document will be essentially realised by the councils (new quarries to meet the agreed sub regional apportionment figure) and industry (new sites for the winning and working of sand and gravel mineral to supply to market).

**What do you already know about the relevance of the strategy / policy / procedure / practice?  
What are the main issues you need to consider?**

*Some things to consider:*

- *How is the policy likely to affect the promotion of equality in the areas of age, disability, gender, gender reassignment, race, religion or belief, sexual orientation, or human rights?*
- *How do you think that the policy will meet the needs of different communities and groups?*
- *What consultation has already been undertaken which is relevant to the development of this policy?*
- *Are there any examples of existing good practice in this area – such as measures to improve access to the policy among particular groups?*
- *Do you think that your policy presents any problems or barriers to any community or group?*

**1.4. What data, research and other evidence or information is available which will be relevant to this EIA?**

The draft Plan is supported by a raft of technical evidence designed to support the proposals it contains. Each proposed site within the document represents the culmination of detailed iterative evidence gathering, appraisals and detailed assessments all designed to ensure that any potential impacts (direct, indirect and/or cumulative) on all facets of local communities have been appropriately addressed or identified as a key consideration for a planning application to address. The draft Plan has also been the subject of numerous stages of consultation and recommendations/advice and evidence provided through these exercises has been used to inform the development of the Plan where necessary and appropriate.

It is not entirely possible to demonstrate that the document and all subsequent plan implementation phases will meet the needs of different communities and/or groups in society. The draft Plan is, in essence, a plan which presents options and opportunities for the development of new (or expanded) sand and gravel quarries. Not all of these facilities will be open to the public for use post working/restoration, neither would it be appropriate in all cases for subsequent development/restoration proposals to operate in this manner. The important point to make is that the draft Plan is not designed to discriminate, it is a document designed to deliver a particular form of development that, in part, will service the community (through effective, appropriate and accessible (where possible) restoration post working and the supply of mineral for use in development) and industry.

**1.5. What further data or information do you need to carry out the assessment?**

The draft Plan will (once submitted) be examined by an independent, government appointed Planning Inspector. At this stage, the councils do not consider that more could be done to improve the draft Plan's assessment of equality impacts. That said, the Planning Inspector may wish to interrogate this as a matter through the examination process.

Once the draft Plan is adopted, any subsequent planning application process associated with the delivery of new sand and gravel quarries for any of the 7 proposed sites will need to demonstrate that all necessary mitigation measures have been designed to address potential impacts on local communities / groups, businesses and individuals. Where necessary, this may entail developing evidence through further assessment work designed to support the application.

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## **Step 2 – Involvement, Consultation and Partnerships**

When considering how you will involve and consult other people in developing the policy, you need to think about internal and external audiences and all areas of the statutory duties.

**2.1. Please use the table directly below to outline any previous involvement or consultation which is**

| relevant to this strategy / policy / procedure / practice  |   |
|--|---|
| Equality target group  | Briefly describe what you did, with whom, when and where. Please provide a brief summary of the responses gained and links to relevant documents, as well as any actions. |
| Age  | Consultation in accordance with the councils' SCIs  |
| Disability   | Consultation in accordance with the councils' SCIs  |
| Gender   | Consultation in accordance with the councils' SCIs  |
| Gender reassignment  | Consultation in accordance with the councils' SCIs  |
| Race   | Consultation in accordance with the councils' SCIs  |
| Religion or belief   | Consultation in accordance with the councils' SCIs  |
| Sexual orientation   | Consultation in accordance with the councils' SCIs  |
| Human rights   | Consultation in accordance with the councils' SCIs  |
| Other  | Consultation in accordance with the councils' SCIs  |
| <p><i>Note: The councils have also undertaken inclusive processes of engagement – e.g. The Wiltshire and Swindon Minerals Forum process (2005/2007); public exhibitions, Area Board meetings and wider consultation events/exercises undertaken to support previous stages in the draft Plan's formulation (2010/11 and 2012).</i></p>   |   |
| <p><b>2.2. If consultation and involvement of specific groups did not take place, please state why</b></p> <p>Not applicable. Consultation on all Local Development Documents prepared by the councils is undertaken in an inclusive manner. Our database of consultees contains a broad mix of statutory ("specific"), non-statutory and general consultees. Community Area Boards and Parish Councils are informed of all key decisions and progress made and this information is disseminated to local communities. We also advertise widely across Wiltshire, Swindon and beyond within local newspapers and engage the media more generally with articles relating to our work.</p> |   |

| <b>2.3. What do previous consultations show about the potential take-up of any resulting activities or services?</b>   |
|--|
| <p>The results of previous consultations on the draft Plan consistently demonstrate that local communities who consider themselves to be affected by the councils' proposals actively engage the councils. Indeed, we have consistently received comments from more people than originally consulted. Although this doesn't entirely demonstrate our commitment to engaging 'hard to reach' groups, the SCI commitments of both councils have been rigorously applied.</p> <p>The issue that continues to face the councils is how the process of engaging all facets of local communities can be improved. There is definitely an element of communication failure in the case of 'difficult to reach' groups that still needs to be addressed in order to actively engage with all groups in society (a key facet of the Localism Act). This is being tackled through such measures as translation services.</p> |

| <b>2.4. How are external partners involved, or how do you intend to involve external partners, in delivering the aims of this strategy / policy / procedure / practice? (if applicable)</b>   |
|---|
| <p>The draft Plan has been prepared jointly with Swindon Borough Council. Once adopted, the draft Plan will be a 'shared' document involving the councils, industry and the community (through dialogue and consultation) developing detailed proposals for new sand and gravel quarries.</p> |

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### Step 3 – data collection and evidence

| <b>3.1. What evidence or information do you already have about how this policy might affect equality, and what does this tell you?</b>   |
|--|
| <p><i>Please cite any quantitative (for example, statistical or research) and qualitative evidence (for example, monitoring data, complaints, surveys, focus groups, questionnaires, meetings, interviews) relating to</i></p> |

*groups having different needs, experiences or attitudes in relation to this project. Describe briefly what evidence you have used.*

Bearing in mind the content and strategic status of the draft Plan, it is not possible to fully quantify the extent to which the proposed minerals sites in the plan will impact on equality in local communities. The evidence gathered throughout the plan preparation process combined with the outcomes of the detailed site assessment and iterative sustainability appraisal processes leads the councils to consider that equality and diversity within the community will not be adversely affected.

Detailed site assessments of the 7 sites included in the draft Plan have been undertaken, these included assessments on transport, ecology, landscape and visual, archaeology, historic built environment, noise, air quality and hydrogeological impact assessment (carried out for Upper Thames Valley sites). Through these assessments the councils were able to determine potential impacts on individuals, communities and businesses and where potential impacts could be felt, the draft Plan sets out measures to control and mitigate against these.

Furthermore, through the recently concluded pre-submission consultation exercise, a number of comments relating to impacts on communities were raised and a number of proposed alterations to site profiles were suggested. These proposed changes were reviewed and have been submitted alongside the draft Plan as proposed modifications to be incorporated into the draft Plan where it was deemed that suggested changes would strengthen mitigation measures/wording to reduce impacts on communities.

### **3.2. What does available data tell you about the potential take-up of any resulting activities or services?**

As outlined above, the principle aim of the draft Plan is to present a flexible framework of sites for the future supply of sand and gravel to meet agreed apportionment figures. It [the document] is not designed to provide sites specifically for community use, although such after uses following restoration of sites post working have been promoted where it has been demonstrated there would be benefit.

Once the plan has been adopted and implemented, it (along with sites that are subsequently permitted and developed) will be regularly monitored to ensure that the impacts of development (positive, negative and cumulative) are addressed. This approach will provide the councils with the necessary evidence to undertake reviews of key policies and proposals. In turn, such reviews will also present opportunity to continue the process of engaging with local communities and neighbouring authorities to tackle any impacts that may arise through mineral working at the locations identified.

### **3.3. What additional research or data is required to fill any gaps in your understanding of the potential or known effects of the strategy / policy / procedure / practice? Have you considered commissioning new data or research?**

At this stage, the councils have not considered the need to commission more research. The process of plan, monitor and review will enable the councils to keep abreast of changing circumstances. In addition, the implementation of the plan (post adoption) will lead to the opportunity to fully test the degree to which the proposed mitigation set out for each proposal reduces impacts on local communities.

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## **Step 4 – Assessing impact and strengthening the strategy / policy / procedure / practice**

*What evidence do you have about how the strategy / policy / procedure / practice will affect different groups and communities in relation to equality and human rights?*

### **4.1. How does / will the strategy / policy / procedure / practice and resulting activities affect different communities and groups?**

*Some things to consider:*

- *Is there any potential for, or known, adverse or positive impacts of the policy?*
- *You should consider how the policy might affect communities with small populations; people affected by discrimination in multiple areas of equality (age, disability, gender, gender reassignment, race, religion or belief, and sexual orientation); specific interest groups such as small businesses, voluntary sector agencies and other service providers.*
- *Are there examples of good practice that can be built on?*
- *You may wish to consider how the policy will be delivered or communicated.*

The draft Plan sets out proposals for mineral extraction on land considered to offer the most sustainable opportunity for development having assessed all possible options. It does not fully define the precise nature of any subsequent development, to do so would go beyond the scope of what a draft Plan can cover. However, the draft Plan does highlight specific issues that will need to be addressed in order to mitigate for potential impacts on communities and local businesses. It will be for the subsequent implementation phase to fully scope and address the precise nature of mitigation measures.

The draft Plan identifies receptors that may be adversely impacted should operations on the sites allocated in the plan be developed. Local businesses, communities and individuals may be affected by certain factors such as dust, noise and HGV movements, but where it is felt that these issues could have significant impacts, the draft Plan explicitly refers to the need for robust mitigation measures to be designed before any planning approval will be given. The pre-submission consultation exercise provided another opportunity for local communities and businesses to comment on the draft Plan and submit any further modifications to site profile tables. Suggested modifications have been considered, and those that are deemed to strengthen the draft Plan will be submitted, alongside the draft Plan, to the Secretary of State for Independent Examination.

#### **4.2. What measures does, or could, the strategy / policy / procedure / practice include to help promote equality of opportunity?**

*For example, positive measures designed to address disadvantage and reach different communities or groups?*

As the draft Plan covers the identification of sites considered suitable for future sand and gravel extraction, it can only go so far in terms of promoting equality of opportunity. The opportunity presented through the various proposals will be utilised by the Minerals Planning Authorities, the minerals industry and relevant organisations, and the public through restoration of the sites post-working. No specific measures have been included to actively promote equality of opportunity.

#### **4.3. What measures does, or could, the strategy / policy / procedure / practice include to address existing patterns of discrimination, harassment or disproportionality?**

This is not a matter that can be addressed within the scope of the draft Plan.

#### **4.4. What impact will the strategy / policy / procedure / practice have on promoting good relations and wider community cohesion?**

The draft Plan has been designed to ensure that the impact of any subsequent mineral working will be kept to an absolute minimum. Mineral working is generally considered to be a 'bad neighbour' land use and hence the general feedback received through the consultation has been negative for the most part. This is unfortunate, but explains why the policies of the councils, in relation to minerals, are seeking to breakdown the stigma attached to minerals extraction. The approach that has been adopted is designed to demonstrate that there are sustainability benefits of siting new quarries in areas where existing quarries are located (due to availability of mineral resource) allowing use of existing infrastructure and maintaining existing market supply patterns to reduce environmental impacts as much as possible. The draft Plan has been developed with a restoration led approach at its heart and from its inception. This approach has allowed the councils to develop a plan that has placed great importance on the potential suitable after use of any site in the plan and consultation exercises have sought opinion and recommendation on suitable restoration options throughout the entire plan making process. The draft Plan strongly reflects this approach by planning and holistically outlining suitable

restoration objectives for each site, or a number of sites where they are located in proximity to one another.

**4.5. If the strategy / policy / procedure / practice is likely to have a negative effect ('adverse impact'), what are the reasons for this?**

*Consider and include comments on direct or indirect discrimination.*

The draft Plan seeks to ensure that all potentially negative impacts are addressed. Local businesses, communities and individuals may be affected by certain factors such as dust, noise and HGV movements associated with mineral working. Matters in relation to negative effects have been scoped and assessed at various stages in the plan preparation process. The final version of the draft Plan is considered to represent the best practicable option for addressing Wiltshire and Swindon's requirements for sand and gravel production for the period up to 2026.

The detailed design of planned mitigation will be a matter for the planning application process.

**4.6. What practical changes will help reduce any adverse impact on particular groups?**

*For example:*

- *Changes in communication methods, providing language support, collecting data, revising programmes or involvement activities.*
- *Have you considered our legal responsibilities under the Disability Discrimination Act, including treating disabled people more favourably where necessary?*

The practical aspects of addressing adverse impacts will be a matter for plan implementation. The draft Plan sets out measures to control impacts, but as set out previously, the planning application process will deal with all matters of detailed design (e.g. the mitigation proposed or additional assessments to deal with specific issues/potential impacts as raised in the draft Plan).

**4.7. What evidence is there that actions to address any negative effects on one area of equality may affect other areas of equality or human rights?**

The councils' have no evidence to address this particular point at this stage.

**4.8. What will be done to improve access to, and take-up of, services or understanding of the policy / strategy / function or procedure?**

*Some things to consider:*

- *Increasing awareness of the policy among staff.*
- *Reviewing your staffing profile to make sure you reach all parts of local communities.*
- *Encouraging wider public involvement in our work or communications activities.*
- *Encourage different groups, including disabled people, to get involved in what we do.*

This aspect of equality has been dealt with above.

Please note that you may need to revisit this section once you have completed the policy development process.

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## **Step 5 – Procurement and Commissioning**

**5.1. Consideration of external contractor obligations and partnership working**

*Is the implementation of this strategy / policy / procedure / practice due to be carried out wholly or partly by contractors / commissioning? If yes, have you done any work to include equality and human rights considerations into the contract / service level agreements already?*

*If you have, please set out what steps you will take to build into all stages of the procurement / commissioning process the requirement to consider the general equality duties and equality more*

*broadly.*

*Specifically you should set out how you will make sure that any partner you work with complies with equality and human rights legislation. You will need to think about:*

- *Tendering and Specifications*
- *Processes for awarding contracts*
- *Contract / SLA clauses*
- *Performance measures and monitoring*

Where the councils have relied upon external consultants<sup>5</sup> to support the preparation of the draft DPD, all contracts have been prepared in accordance with law. Where considered appropriate to the scope of the contract, issues of equality, diversity and opportunity / choice have been included.

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## **Step 6 – making a decision**

### **6.1. Summarise your findings and give an overview of whether the strategy / policy / procedure / practice will meet the Council's responsibilities in relation to equality and human rights**

The Proposed Submission draft Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan ("the draft Plan") is a statutory planning policy document. It contains a framework of 7 sites for locating future sand and gravel quarries having assessed all reasonable alternative options. These proposals set the context for future minerals development; and will help influence choice and decision making in relation to detailed planning applications by establishing the likely issues that will require mitigation.

The councils' have reached the final preparatory stage in preparing the draft Plan – the submission stage. The document will now be submitted to the Secretary of State for Communities and Local Government and examined by an independent, government appointed Planning Inspector who will consider the soundness of the document. As part of this process, the Inspector will examine this impact assessment and consider issues of equality and diversity as they apply to the content of the draft Plan.

All the work that has gone before in terms of preparing the document (detailed site appraisals, environmental appraisals, sustainability appraisals and two rounds of inclusive consultation), has been carried out in accordance with statutory and local policy (SCI) provisions; in accordance with the duty to co-operate; and in compliance with the Town and Country Planning (Local Development) (England) Regulations as amended / Town and Country Planning (Local Planning) (England) Regulations 2012.

When the document has been adopted it will be regularly monitored to ensure that detailed proposals and new development deliver the objectives of the wider Minerals policy framework of Wiltshire and Swindon. Where necessary, the document (or parts therein) will be reviewed in order to address changing circumstances. This process will offer further opportunities to consider matters of equality, diversity and opportunity through engagement and further consultation activity.

### **6.2. What practical actions do you recommend to reduce, justify or remove any adverse / negative impact?**

*Please note that these should be reflected in the action plan (see Step 8).*

- Ensure that all subsequent planning applications for development on the allocated sites deliver the level of mitigation as set out in the draft Plan;
- Ensure that minerals activities (working and restoration) are monitored regularly to ensure

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<sup>5</sup> The councils procured the services of C4S and Enfusion to undertake Sustainability Appraisals (incorporating Strategic Environmental Assessments) and Habitats Regulations Assessments to support the process of plan making. Mouchel (Air Quality, Noise) and URS Scott Wilson (Hydrogeological Impact Assessments of Upper Thames Valley Sites) were also used to undertake assessments of sites.

compliance with the terms of all subsequent planning permissions;

- Ensure that any subsequent plan review process continues to engage effectively with typically 'hard to reach' groups and individuals within society.

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## Step 7 – monitoring, evaluating and reviewing

### **7.1. How will the recommendations of this assessment be built into wider planning and review processes?**

*This may include policy reviews, annual plans and use of performance management systems.*

As with all planning policy documents, the councils are committed to the process of monitoring and review to address changing circumstances (including a monitoring framework to support this Plan). To augment such processes, the councils will continue to learn from best practice and develop a 'joined-up' approach to addressing issues of equality and diversity within local communities.

### **7.2. How will you monitor the impact and effectiveness of the strategy / policy / procedure / practice?**

*This could include adaptations or extensions to current monitoring systems, relevant timeframes and a commitment to carry out an EIA review once the policy has been in place for one year.*

The plan (once adopted) will be regularly monitored. Where circumstances change, or policies / proposals are deemed to be failing to deliver the outcomes required, then the plan (or parts therein) will be amended. The process of plan review will involve detailed appraisals, assessments, inclusive engagement and consultation in accordance with best practice.

### **7.3. Give details of how the results of the impact assessment will be published**

*There is legal requirement to publish assessments. Completed assessments should be first be quality assured and then, once signed off, be published on the Council website, via the Web Team.*

The impact assessment will be used to support the examination of the draft Plan. To this extent, it [the impact assessment] will be submitted along with the councils' evidence in support of the draft Plan. It will also be published on the councils' examination website.

## Step 8 – action plan

| Taking into consideration the responses outlined in Steps 1-7, complete the action plan below (if appropriate). |   |  |  |  |
|---|---|--|--|--|
|   | <b>Actions</b>  | <b>Target date</b>                                     | <b>Responsible post holder and Directorate</b>             | <b>Monitoring post holder and Directorate</b>              |
| <b>Involvement, Consultation and Partnerships</b>   | Through the review of the draft Plan (and all other aspects of the Wiltshire and Swindon Minerals Development Framework) the councils will continue to develop methods of communicating and engaging local communities, specific groups and individuals to address equality and diversity issues. | As defined by the councils' Local Development Schemes. | As defined by staffing structures within the two councils. | As defined by staffing structures within the two councils. |
| <b>Data collection and evidence</b>   | To investigate best practice methods in terms of data capture and integrate appropriate approaches into the review of all subsequent Minerals DPDs / Local Plans.   | As defined by the councils' Local Development Schemes. | As defined by staffing structures within the two councils. | As defined by staffing structures within the two councils. |
| <b>Assessment and analysis</b>  | To develop and utilise best practice methodologies in relation to the assessment of policies; and proposals and the identification and mitigation of the impacts.   | As defined by the councils' Local Development Schemes. | As defined by staffing structures within the two councils. | As defined by staffing structures within the two councils. |

|   |  |  |  |  |
|---|--|--|--|--|
| <b>Procurement and Commissioning</b>        | To develop and utilise best practice methodologies in relation to how the councils procure and commission consultancy work.  | As defined by the councils' Local Development Schemes. | As defined by staffing structures within the two councils. | As defined by staffing structures within the two councils. |
| <b>Monitoring, evaluating and reviewing</b> | To develop and utilise best practice methodologies. To follow the monitoring framework established through the Wiltshire and Swindon Minerals Development Framework and those specifically developed through the Aggregate Minerals Site Allocations Local Plan. | As defined by the councils' Local Development Schemes. | As defined by staffing structures within the two councils. | As defined by staffing structures within the two councils. |

*NOTE: As the draft Plan has reached the final preparatory stage, the Action Plan will be developed to support on-going monitoring and review processes.*

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## Sign-off

**The final stage of the EIA is to formally sign off the document as being a complete, rigorous and robust assessment**

The strategy / policy / procedure / practice has been fully assessed in relation to its potential effects on equality and all relevant concerns have been addressed.

### Author of strategy / policy / procedure / practice and EIA

|                        |   |                   |   |
|------------------------|---|-------------------|---|
| Name:<br>Geoff Winslow | Job title and directorate:<br>Spatial Planning Manager –<br>Environment & Resources | Date:<br>01/06/12 | Signature:<br> |
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