

# Fair Treatment Assessment (FTA) Form



<b>Part A: Overview</b>			
<b>1 Name of service, policy, strategy, procedure, or function etc</b> Note: to save space services, policies, strategies, procedures and functions will be referred to as “functions” for the rest of this form.			
Local Plan Review – Draft Submission Local Plan			
<b>2 Directorate</b>	Economy and Infrastructure	<b>3 Division/Service</b>	Planning Design and Engagement Services
<b>4 Is this a new, existing or revised function?</b>	This is a review of the Local Plan that was adopted in 2013.		
<b>Part B: Background and Context</b>			
<b>5 Why are you completing this FTA?</b>			
<p>The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.</p> <p>The Council’s current plan was adopted in December 2013 and work commenced on reviewing the plan in 2015 when it was decided to review the plan as whole rather than pursue a Local Area Plan for the HS2 Interchange site and wider area. Two further factors also pointed to an early review of the plan; namely to deal with the legal challenge to the housing requirement in the Solihull Local Plan (SLP) and to address the housing shortfall that is occurring in the wider housing market area.</p> <p>The next formal stage in the plan making process is the publication of the ‘draft submission’ plan – this is the plan the Council intends to submit for examination and is also known as the Regulation 19 plan. It is subject to a minimum six week period for engagement and representations made at this stage are specifically sought into the soundness and legal compliance of the plan; and any such representations would then be the focus for the subsequent independent examination.</p> <p><b>This is not the Final FTA, but has been developed to ensure policy formulation has considered equalities and the protected characteristics in the development of the Local Plan Review – Draft Submission to be consulted on during October 2020 to December 2020.</b></p>			
<b>6 In terms of equality, what do you already know about this function?</b>			
<p>Through a scoping exercise, each of the policies have been assessed for relevance to each of the protected characteristics defined within the Equality Act (age, disability, gender identity, pregnancy &amp; maternity, race, religion, sex, marriage &amp; civil partnership, and sexual orientation). This is shown in Appendix A. This has been used to access what impact the policy/area COULD have on the protected characteristics both positive and negative. This scoping exercise has been used to inform policy formulation, however the actual policies as drafted in the Local Plan Preferred Option consultation have</p>			

analysed as set out below. This led to the development of an FTA in 2016 that accompanied the Draft Local Plan that was consulted upon between November 2016 and January 2017.

Solihull's current Statement of Community Involvement (SCI) was adopted in 2020. It explains how the Council will involve residents, local communities, businesses and other stakeholders in the preparation and review of planning policy and the consideration of planning applications. The SCI is a Local Development Document and forms part of the Council's statutory local planning framework. The Council must comply with it in the preparation of any planning policy documents and when determining planning applications.

The SCI is divided into five chapters. The first chapter is an introduction which sets out the purpose, aims and context of the SCI and links with other council and community involvement initiatives. Chapter 2 explains how the Council will involve local communities and stakeholders in the preparation and review of planning policy. Chapter 3 sets out how the Council will provide assistance and advice to those involved in neighbourhood planning. Chapter 4 set out the Council's policy with regard to community engagement in the preparation of the Community Infrastructure (CIL) Charging Schedule and Chapter 5 to the consideration of planning applications.

The SCI also sets out the final stages and adoption of new Local Plan:

- Draft Submission Consultation draft Summer 2020
- Examination by Planning Inspectorate
- Adoption by Full Council

The SCI and associated Fair Treatment Assessment (FTA) were consulted on comprehensively so that all parts of the community have the opportunity to comment on it and before adoption the SCI was consulted upon for an eight week period between August 2019 and September 2019. Facilitating equal access to participation in local planning decisions is important. The FTA that was carried out on the draft SCI did not identify any specific issues.

## **7 What outcomes are wanted from this function?**

The LPR is a full review of the plan in the sense that all policies are being reviewed. This is as opposed to a partial review that only considers changes to a limited number of policies. A partial review is not considered appropriate as the drivers for a review relate to both housing numbers and the need to consider land to be released from the Green Belt. These are factors closely linked with the overall plan strategy. Once housing policies are being changed, this will nearly always have consequential impacts on other parts of the plan.

The SLP was adopted in 2013 and a number of its policies remain up to date and relevant and can be incorporated into the LPR with appropriate amendment (where necessary). Other policies will be fundamentally different.

The structure of the document will be similar to the SLP, and the same policy structure will be retained (using the same reference numbers to the policies for ease of reference/comparison, albeit with a small number of additions).

In support of the Draft Local Plan will be a series of topic papers. These will explain the nature of the evidence base, how it has been used, and how the plan has been formulated. Issues to be included in these papers include:

- Overall approach and duty to cooperate
- Housing
- Economy & employment
- UK Central and HS2
- Protecting the environment

- Promoting quality of place
- Delivery and infrastructure

## **8 Are any other departments or partners involved in the delivery of the function? How are they being involved in this assessment?**

The Policy and Engagement Team is responsible for the Review of the Local Plan and involves a wide range of stakeholders both within and outside the Council.

The Council's Statement of Community Involvement (SCI) explains how Solihull Council will involve communities and stakeholders (partners) in all planning matters, including the production of planning policy and proposal documents (such as the Local Plan) and the consideration of planning applications. The Statement of Community Involvement aims to improve community and stakeholder involvement in planning by ensuring that everyone has the opportunity to, and is encouraged to, become involved in planning matters. It also reflects the views of community and stakeholder representatives consulted in the process of producing and adopting the Statement of Community Involvement.

## **Part C: Assessment**

### **9 What key information, results of consultation or data have you collected and used to inform this assessment?**

Engagement with stakeholders and other local authorities is an integral part of the Plan process, which the Council is required to demonstrate through to the Examination (and beyond).

A range of methods was used to publicise the Scope, Issues and Options consultation, including notification of stakeholders, email, Twitter and Facebook alerts, press releases, Parish Council and Residents Associations briefings, and topic workshops, with documentation available in libraries and connect centres. For the draft Local Plan in 2016 a similar mix was used including

The scoping exercise helped test the policies with relevance to each of the protected characteristics defined within the Equality Act (age, disability, gender identity, pregnancy & maternity, race, religion, sex, marriage & civil partnership, and sexual orientation) as shown in Appendix A. This has been used to access what impact the policy/area COULD have on the protected characteristics both positive and negative. This scoping exercise has been used to inform policy formulation.

The Sustainability Appraisal of the Scope, Issues and Options consultation also assessed against a number of sustainability issues, including:

- Amount and location of new housing
- Meeting housing need and demand
- Sustainable communities, including link between housing and employment growth
- Employment needs
- Healthy lifestyles and health inequalities
- Reduce crime, fear of crime and anti-social behaviour
- Increase accessibility, reduce the need to travel and reduce congestion

The following were focus areas of policy formulation within Local Plan Review, to help improve sustainability:

- Encourage sustainable economic growth and prosperity for all in a diverse local economy, with employment opportunities suited to the needs of the local workforce
- To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups and reduce social exclusion and disparities within the Borough
- To reduce the number of people with difficulties accessing employment, education and training opportunities
- To ensure the location of development makes efficient use of the existing infrastructure and helps to reduce the need to travel
- To improve community capital and reduce isolation across the social gradient in the Borough
- Improve the supply and affordability of housing
- To fully integrate the planning, transport, housing, cultural, recreational, environmental and health systems to address social determinants of health in each locality to reduce health inequalities and promote healthy lifestyles
- Enhance public safety and reduce crime, fear of crime and anti-social behaviour
- Encourage development with a better balance between jobs, housing and services, and provide easy and equitable access to opportunities, basic services and amenities for all
- Ensure the Borough's national and regional assets reflect wider needs

A Sustainability Appraisal of the Draft Submission Plan has been completed. By ensuring these aspects are included means that the potential to reduce inequalities through the sustainability appraisal is maximised.

**10 What does your information tell you about the impact of your function on different groups of people? Are there any specific differences (positive or negative) between their experiences of interacting with this function?**

**The council has a duty to eliminate discrimination/harassment and victimisation, as well as duties to promote equality of opportunity, and foster good relations between groups of people. In assessing the effects of your function on different groups of people, you should think about how your function achieves these three aims.**

Note: You should consider barriers to equal access, equality of outcomes, human rights and the ten dimensions of equality for the different groups of people listed

	<b>Are any of these positive impacts? How could you better promote equality? How could you improve relations between groups of people?</b> Note: If any actions are identified insert these into Part D	<b>Are any of these negative impacts? How can you reduce/eliminate these?</b> Note: If any negative impacts are identified put actions to address these in Part D	<b>What evidence has informed this assessment?</b>
<b>*Age</b>	Throughout the various policies of the Local Plan there is a focus on generating localised employment, economic and development opportunities; along with a focus on public transport improvements and ensuring that developments increase accessibility for the local community, especially for walking and cycling access. This will be particularly beneficial for local	No specific issues identified.	The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment, Green Spaces Strategy, Solihull Connected (Transport

	<p>residents who do not have the use of private motor vehicles and are more reliant on sustainable transport methods – this includes both younger and older people.</p> <p>P2 – Maintain Strong, Competitive Town Centres includes a commitment for the council to encourage, through the development management process, a broad age spectrum of residents into the centre to enjoy a wide variety of leisure and entertainment facilities.</p> <p>The Plan acknowledges changing household composition, including more single people over pensionable age and increased number of households made up of the over 75s. P4 (Meeting Housing Needs) and P5 (Provision of Land for Housing) help to address the need for more homes and more choice, because of this there is a need for more specialist and supported housing together with homes suitable for downsizing. Policy P4e sets a housing policy for older and disabled people, and requires that all housing is built to at least Category M4(2) (Accessible and Adaptable dwellings) of approved Building Regulations Document and at least 5% of housing on major development sites must be wheelchair user dwellings to M4(3) of the Building Regulations.</p> <p>The shortage of suitable housing for older people is acknowledged in the plan. The specific housing needs of older people are identified within P4 – Meeting Housing Needs and P18 – Health and Well Being, and “Widen[ing] the range of</p>		<p>Strategy), Sustainability Appraisal, amongst others</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
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	<p>options for older people and those with disabilities through provision of accommodation which is designed to meet these diverse needs” is listed as a specific objective, as is “To provide an adequate amount and variety of homes to meet the increasing demand from older people and those with disabilities, and other needs”. P4 also makes reference to the need to secure a range of house types and sizes to help achieve socially balanced and mixed communities, which will benefit all communities. “Support[ing] the Affordable Warmth programme to ensure high standard of home insulation for older people and others at risk” is listed as a specific objective.</p> <p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible (both physical and location), easily maintained and encourage walking and cycling and reduce the fear of crime. This will be particularly beneficial for older and younger people.</p> <p>The focus on providing land for affordable housing will directly benefit younger people (as evidenced by the Housing and Economic Development Needs Assessment).</p> <p>It is recognised that poor diet is a significant factor in obesity and associated poor health. The Plan aims to provide opportunities to consume fresh food and seeks to manage the concentration of hot food takeaways, particularly around schools.</p>		
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	<p>P20 makes a commitment to ensuring that where the minimum standard for children’s play and youth facilities is already met, developments will be expected to give more generous provision, and that proposals for family housing provide opportunities for safe children’s play in accordance with design standards (as evidenced by the Green Spaces Strategy).</p>		
<b>Carers</b>	<p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible (both physical and location) and reduce the fear of crime. This will be of benefit to carers.</p>	No specific issues identified.	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
<b>*Disability</b>	<p>Throughout the various policies of the Local Plan there is a focus on generating localised employment, economic and development opportunities; along with a focus on public transport improvements and ensuring that developments increase accessibility for the local community, especially for walking and cycling access. This will be particularly beneficial for local</p>	No specific issues identified.	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected</p>

	<p>residents who do not have the use of private motor vehicles and are more reliant on sustainable transport methods – this includes a large proportion of disabled residents.</p> <p>Consultation on the Scope, Issues and Options suggested that the Local Plan should have a greater focus on health, with its own section and policy – this has been incorporated as P18 – Health and Well Being.</p> <p>The Plan acknowledges changing demographics, including the continual increase in the number of people with disabilities. P4 (Meeting Housing Needs) and P5 (Provision of Land for Housing) help to address the need for more specialist and supported housing to meet a range of needs because of this – both affordable and market provision.</p> <p>The shortage of suitable housing for people with disabilities is acknowledged in the Plan. The specific housing needs of disabled people are identified within P4 – Meeting Housing Needs and P18 – Health and Well Being and “Widen[ing] the range of options for older people and those with disabilities through provision of accommodation which is designed to meet these diverse needs” is listed as a specific objective, as is “To provide an adequate amount and variety of homes to meet the increasing demand from older people and those with disabilities, and other needs”. P4 also makes reference to the need to secure a range of house types and sizes to help achieve socially balanced and mixed communities, which</p>		<p>(Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
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	<p>will benefit all communities.</p> <p>Policy P4e sets a housing policy for older and disabled people, and requires that all housing is built to at least Category M4(2) (Accessible and Adaptable dwellings) of approved Building Regulations Document and at least 5% of housing on major development sites must be wheelchair user dwellings to M4(3) of the Building Regulations.</p> <p>P8 – Managing Demand for Travel and Reducing Congestion includes a focus on improving the ‘whole journey experience’, with a particular consideration given to the needs of vulnerable users.</p> <p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible (both physical and location), easily maintained and encourage walking and cycling and reduce the fear of crime. This will be particularly beneficial for disabled people.</p>		
<p><b>*Gender reassignment</b></p>	<p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible and reduce the fear of crime. This will be particularly beneficial for transsexual people.</p>	<p>No specific issues identified.</p>	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been undertaken to assess the impact on</p>

			<p>different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
<b>Looked after children/care leavers</b>	No specific issues identified.	No specific issues identified.	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
<b>*Marriage/civil partnership</b>	<p>The Plan acknowledges changing household composition, including more people staying single longer, and more households splitting. P4 (Meeting Housing Needs) and P5 (Provision of Land for Housing) help to address the need for more homes because of this.</p> <p>Throughout the various policies of the Local Plan there is a focus on generating localised employment, economic and development opportunities; along with a focus on</p>	No specific issues identified.	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been</p>

	<p>public transport improvements and ensuring that developments increase accessibility for the local community, especially for walking and cycling access. This will benefit people in Marriage and civil partnership.</p>		<p>undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
<b>*Pregnancy/ maternity</b>	<p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible and reduce the fear of crime. This will be particularly beneficial to pregnant ladies and those providing maternity care, including supporting ease of movement when navigating push chairs etc.</p> <p>Supporting community facilities will also be provided and encouraged through new development and within designated town, village and local centres to support ease of access and opportunities for linked trips.</p>	No specific issues identified.	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
<b>*Race/ ethnicity</b>	<p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible, easily maintained and encourage walking and cycling and reduce the fear of crime. This will be particularly beneficial for Black, Asian and Minority Ethnic (BAME) people.</p> <p>Through P3 – Provision of Land for General Business and Premises the Council plans a continuing supply of</p>	No specific issues identified.	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Solihull Gypsy and Traveller Site Allocations Plan, Sustainability Appraisal, amongst</p>

	<p>employment land – this will have a positive impact on local enterprise.</p> <p>P6 Provision of Accommodation for Gypsies and Travellers sets out that the Council will meet the identified need for Gypsy and Traveller Accommodation in the Borough. It seeks to maintain an appropriate level of supply of authorised Gypsy and Traveller sites, reduce the number of unauthorised developments and encampments and enable Gypsies and Travellers to access the services and facilities to meet their needs, whilst respecting the interests of the settled community. The Council recognises that Gypsies and Travellers are amongst the most socially excluded groups in society, and that there is a link between the lack of good quality sites and poor health and education outcomes.</p> <p>P4 - Meeting Housing Needs makes reference to the need to secure a range of house types and sizes to help achieve socially balanced and mixed communities, which will benefit all communities.</p> <p>Throughout the various policies of the Local Plan there is a focus on generating localised employment, economic and development opportunities; along with a focus on public transport improvements and ensuring that developments increase accessibility for the local community, especially for walking and cycling access. This will be particularly beneficial for local residents who do not have the use of private motor vehicles and are more reliant on sustainable transport methods</p>		<p>others.</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
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	– which research shows differs by ethnicity.		
<b>*Religion/ belief/ faith</b>	<p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible, easily maintained and encourage walking and cycling and reduce the fear of crime. This may be particularly beneficial for some people who visibly follow a religion.</p> <p>Policy P19 supports the delivery of new community infrastructure which could include opportunities for new places of worship in accordance with the national use class order.</p>	Accessibility does not make any reference to proximity to places of worship.	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
<b>*Sex/Gender</b>	<p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible, easily maintained and encourage walking and cycling and reduce the fear of crime. This may be particularly beneficial for women who report a higher fear of crime, and for men who statistically more likely to be the victims of crime.</p> <p>Throughout the various policies of the Local Plan there is a focus on generating localised employment, economic and development opportunities; along with a focus on public transport improvements and ensuring that developments increase accessibility for the local community,</p>	No specific issues identified.	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be</p>

	<p>especially for walking and cycling access. This will be particularly beneficial for local residents who do not have the use of private motor vehicles and are more reliant on sustainable transport methods – which research shows differs by gender.</p>		<p>sought from stakeholders and the community and these will be analysed across different characteristics.</p>
<b>*Sexual orientation</b>	<p>P15 – Securing Design Quality makes a policy commitment to creating safe and uncluttered streets and public spaces which are accessible and reduce the fear of crime. This will be particularly beneficial for lesbian, gay and bisexual people who report a higher fear of crime.</p>		<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community will be analysed across different characteristics.</p>
<b>Socio-economic disadvantage</b>	<p>Throughout the various policies of the Local Plan there is a focus on generating localised employment, economic and development opportunities; along with a focus on public transport improvements and ensuring that developments increase accessibility for the local community, especially for walking and cycling access. This will be particularly beneficial for local residents who do not have the use of private motor vehicles and are more reliant on sustainable transport</p>	<p>The impacts of proposed waste management operations, mineral workings, sewage treatment works, and certain intensive agricultural uses will be most felt by those communities in close proximity.</p> <p>The Local Plan Review prioritises the reuse of brownfield sites before allocating green belt sites. It is acknowledged that some of the allocated sites may result in loss of open space. Any unacceptable harm will need to be minimised and/or appropriate mitigation incorporated.</p>	<p>The Draft Submission Plan has been based on a number of studies informed by information collected by the Council and its partners, which includes data relating to protected characteristics. These include the: Housing and Economic Development Needs Assessment , Green Spaces Strategy, Solihull Connected (Transport Strategy), Sustainability Appraisal, amongst others.</p> <p>A scoping of policies has been</p>

	<p>methods – this is more likely to be those from more deprived areas. Under P7 (Accessibility and Ease of Access) and P8 (Managing Demand for Travel and Reducing Congestion) it is recognised that by improving access to employment, education and services for people living in areas such as North Solihull this will support narrowing the equality gap between there and the more affluent parts of Solihull. It is referenced that without reliable access to services, healthy and affordable food, jobs, education, open space, medical and leisure facilities, communities can become disadvantaged and in a cycle of social exclusion. The policies within the Plan are therefore targeted at improving access to these amenities.</p> <p>A number of the policies focus on improving accessibility between developments and North Solihull. An element of the spatial strategy in the Plan is development within North Solihull to facilitate improvement of the area and people's quality of life.</p> <p>Under the Challenges and Objectives section of the Local Plan Reducing Inequalities in the Borough is highlighted as a key challenge.</p> <p>Focusing economic growth as outlined in P1 brings significant benefits to the whole borough and particularly those residents who live in close proximity (particularly within the wards of Bickenhill, Elmdon and Blythe), to ensure the benefits are felt across the borough the Council expects development to demonstrate measures to</p>	<p>Monitor the loss of open space, through the Annual Monitoring Report and ensure any loss of open space is appropriately compensated (as per P20).</p>	<p>undertaken to assess the impact on different groups and identify where further assessment required.</p> <p>Responses to the consultation will be sought from stakeholders and the community and these will be analysed across different characteristics.</p>
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	<p>improve access to employment opportunities.</p> <p>P4 (Meeting Housing Needs) allows for rural exceptions, which responds to the identified need in some parish areas of providing affordable housing for people with a local connection, rather than contributing to the borough-wide amount of affordable housing.</p> <p>P5 (Provision of Land for Housing) phases the provision of land to support improvements and a mix of housing provision and social and community infrastructure.</p> <p>P14 (Amenity) commits to protecting the amenity of residential and shopping area, community facilities and open space from bad neighbour uses (bad neighbour uses are those developments that affect people's visual and other amenities, such as those that create noise, smell or air pollution, however careful consideration of location can minimise impacts and/or appropriate measures can be taken to minimise or mitigate any impacts).</p> <p>The Council recognises the important role that spatial planning has in the creation of healthy communities, and addressing health inequalities. Many of the policies will have an impact on health and well-being and when considered together, the overall impact of any new development should have positive health outcomes.</p> <p>By encouraging walking and cycling the policies within the Plan help to address the lower levels of physical activity in</p>		
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	<p>more affluent areas of the Borough (related to 'lifestyle activities' such as walking and carrying shopping, partly due to higher car ownership and use).</p> <p>P19 – Range and Quality of Local Services acknowledges that small scale local shops and services providing for local needs on a daily basis can be particularly important in rural areas where access to larger centres may be more difficult without car access.</p>		
<b>Other – please specify</b>	None identified.	None identified.	

**11 How does this function contribute towards people’s human rights?** Note: refer to the guidance document for information on human rights. If any actions are identified insert these into Part D

Delivering the good quality and affordable homes that residents need is an effective response to helping people realise their human rights. A number of specific human rights that are relevant to housing and property are set out in the Human Rights Act (1998), these are:

- the right to own, and enjoy the ownership of, property
- the right to respect for private life
- the right to respect for family life
- the right to respect for your home

Assisting people to access suitable and affordable housing that meets the needs of their household is therefore a key function. This is particularly important for young people since getting them the right accommodation that is safe, comfortable and that they are able to maintain has positive impacts on future life chances.

The Human Rights Act also states:

- Everyone has the right to work,
- to free choice of employment,
- to just and favorable conditions of work
- protection against unemployment

Delivering the right amount of employment land to help ensure economic success is an effective response to helping people realise their human rights and creates has a positive impact on future life chances.

**12 How does this function contribute towards safeguarding children and vulnerable adults?** Note: refer to the guidance document for information on safeguarding. If any actions are identified insert these into Part D

The function does not have any direct contact with either vulnerable adults or children, but ensures that the needs of vulnerable adults and children are considered through developments.

## Part D: Actions

**13 List any actions required to address negative impacts identified or to better promote equality, good relations, human rights, and safeguarding issues. Do you need to collect any additional data, conduct equality monitoring, or undertake further consultation to be able to take account of the impact on particular groups?**

Action	Outcome	Lead	Timescale	How will progress be monitored?
Responses to the consultation will be sought from stakeholders and the community across different characteristics	Ensure robust consultation across all protected characteristics	Group Manager Policy and Engagement	Autumn/Winter 2020	Analyse response rates from protected characteristics.
Responses to the consultation will be analysed across different characteristics	Ensure robust consultation across all protected characteristics	Group Manager Policy and Engagement	Spring 2021	Updated Local Plan Review Submission Draft and updated FTA
Monitor the loss of open space, through the Authority Monitoring Report once Local Plan adopted	Monitor the loss of open space, through the Authority Monitoring Report and ensure any loss of open space is appropriately compensated (as per P20)	Group Manager Policy and Engagement	From adoption of Local Plan	Authority Monitoring Report
The progress of all policies in the Local Plan once adopted will be monitored	Ensure all policies in the Local Plan Review are reviewed	Group Manager Policy and Engagement	From adoption of Local Plan	Authority Monitoring Report

## Part E: Summary

**14 a Summary for Publication** Note: this should include the key findings and impacts identified in this assessment – refer to the guidance document

**This is not the Final FTA, but has been developed to ensure policy formulation has considered equalities and the protected characteristics in the development of the Local Plan Review – Draft Submission to be consulted on during October 2020 to December 2020.**

Preparation of the Draft Submission has taken place over a number of stages and this FTA has been developed and reviewed at the stages when policy formulation has taken place.

An equalities scoping exercise of the policy directions of the “Scope, Issues and Options” Consultation has been undertaken which identified for which policy areas further assessment was required and potential impacts (see appendix A). This was used to help formulate the detailed policies in the Local Plan Review. The FTA scoping raised some concerns relating to safety and vulnerability, social housing, phasing of development, accessibility, impacts of climate change and waste management, design and local services. This highlighted the potential to have the biggest impacts on those of differing ages, those with disabilities, and race.

A further assessment of the Draft Local Plan policies has been undertaken, and a number of changes have been made to the Plan policies and supporting text for the preferred option developed for consultation. Consultation will now take place with a wide range of stakeholders, including community groups. A Sustainability Appraisal was also undertaken at each key stage and the SA Framework included a number of relevant issues.

The Local Plan Review creates a policy context through which localised employment, economic, leisure and development opportunities are generated. It addresses our borough’s changing household composition and commits to providing more homes, including specialist and supported housing, and affordable housing.

Generally the Draft Local Plan Review Draft Submission has a positive impact for local communities and across the various equalities groups. There is a focus on developing sustainable communities. It protects the unique character of different parts of the borough, and seeks to attract development that is suitable for the particular localities. The need to provide and maintain suitable health, education, community facilities, and opportunities for social interaction is fundamental in ensuring people across the borough enjoy a good quality of life and have equal and positive life chances.

<b>b Please indicate which of the following best describes the outcome of your FTA</b>	
	<b>Only negative impacts have been identified for this function</b>
	<b>No different impacts have been identified for this function</b>
<b>X</b>	<b>A mixture of positive and negative different impacts have been identified for this function</b>
	<b>Only positive different impacts have been identified for this function</b>
	<b>There wasn’t enough information to be able to reach a conclusion at this point in time</b>

Scoping exercise for Local Plan Review

Key

Red – policy is highly relevant to the identified protected characteristics

Yellow – policy is of medium relevancy to the identified protected characteristics

Green – policy is of low relevancy to the identified protected characteristics

Policy	Relevance to:								Issues
	Race	Gender	Disability	Age	Religion	Sexual Orientation	Gender Identity	Pregnancy & Maternity	
<b>1. Support Economic Success</b>	Green	Green	Yellow	Yellow	Green	Green	Green	Green	<p>Issues relate to the accessibility of developments – particularly in terms of access for disabled and older people. May have a negative impact on Solihull Town Centre.</p> <p>Equalities considerations to be considered alongside Policy 2 – Accessibility and Policy 3 – Securing Design Quality.</p>
<b>2. Maintain a Strong, Competitive Town Centres</b>	Yellow	Yellow	Red	Yellow	Green	Yellow	Yellow	Yellow	<p>Good design can improve safety and reduce fear of crime.</p> <p>Research has shown that there is a relationship between the fear of crime and all of the protected characteristics. In some cases this may be an outright fear of harassment based on that characteristic.</p> <p>Ensuring that new homes are adaptable to the life time and needs of the occupants is particularly relevant for disabled people and our ageing population.</p> <p>Issue of conflict between groups as a result of expansion in night time economy.</p> <p>Equalities considerations to be considered alongside Policy 3 – Securing Design Quality.</p>
<b>3. Provision of</b>	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	<p>The accessibility of employment opportunities is particularly</p>

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Land for General Business and Premises									important for those groups more likely to be more reliant on public transport and/or less access to private motor vehicles, e.g. those on a low-income, older people, children, certain ethnic groups, women and disabled people. The provision of land may also impact on the type of business start-ups – which could impact on enterprise amongst particular groups.
4. Meeting Housing Needs									<p>Housing needs are influenced by protected characteristics.</p> <p>Housing needs relating to ethnicity are not homogenous; but research suggests housing needs to be located in areas perceived by BAME communities as safe and accessible – need to consider proximity to community facilities. There need to be a sufficient number of bedrooms for larger households. There is a notable difference between tenure type and ethnicity.</p> <p>Female households are over-represented in homeless statistics and make up almost three-quarters of all homelessness acceptances in Solihull.</p> <p>Proportionally there are more women in social housing especially as single mothers due to factors such as lower wages and limited employment opportunities(1) but is also related to reasons for homelessness (domestic violence is the second highest cause of homelessness in the borough). Ensuring a good supply of affordable housing will have a positive impact for women by ensuring that there is less competition for appropriate dwellings.</p> <p>Nationally there are large numbers of disabled people living in social housing (2). Need to consider various needs relating to disability, e.g. adults with learning disabilities may require independent living but have support needs; need to plan for required housing type, adaptations and support services relating to disability.</p>

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									<p>The choices available to people requiring accessible or adapted housing are often severely restricted, with demand for appropriate housing outstripping supply. Trends show an ageing population, more single person households and more older people living alone. Obvious implications for housing type, adaptations and support services. People experiencing homelessness / in housing need are likely to be experiencing different issues according to their age. Young people, especially those entering the housing market are facing the greatest difficulties in terms of affordability. This cohort is also more likely to be homeless and more likely to call on support and housing advisory services. Age profile by ward also shows differing housing needs. The need for affordable housing is growing as is the need for smaller property types.</p> <p>National research suggests that young lesbian, gay, bisexual and trans (LGBT) people are more likely to be homeless than their heterosexual counterparts.</p>
<b>5. Provision of Land for Housing</b>									<p>We will need to consider whether phasing/order of release of land will impact disproportionately on certain groups. Depending on how land is released it could impact on the availability of supported housing suitable for vulnerable adults and affordable housing.</p> <p>Equalities considerations to be considered alongside Policy 4 – Meeting Housing Needs</p>
<b>6. Provision of Sites for Gypsies and Travellers</b>									<p>Solihull has a separate Gypsy and Traveller Site Allocations Plan that was adopted in December 2014 that meets need for pitches in the borough from 2012 to 2027 in full. The Policy states that any future needs identified over the Plan period will also be addressed.</p> <p>This policy names an ethnic group in the title and will inevitably impact on them directly.</p>

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<b>7. Accessibility and Ease of Access</b>									<p>Ward profiles show that the spread of our population based on ethnicity differs across ward. For example, wards in North Solihull (Chelmsley Wood, Smith’s Wood, Kingshurst &amp; Fordbridge) have the lowest proportions of Asian residents but the highest proportions of Black and Mixed ethnicity residents. There are similar differences in ward demographics relating to age, with those living in North Solihull wards tending to be younger.</p> <p>The accessibility of developments is particularly important for those groups more likely to be more reliant on public transport, and/or with less access to private motor vehicles, e.g. those on a low-income, older people, children, certain ethnic groups, women and disabled people. For disabled people the accessibility of community facilities is of high importance, for pregnant women the proximity of antenatal facilities will be important.</p> <p>Due to importance of public transport access for certain groups. It is recognised that a higher proportion of women use public transport and do not have access to a car (4) and that women also make more complex journeys than men (5).</p> <p>Research has shown that there is a relationship between the fear of crime and all of the protected characteristics. In some cases this may be an outright fear of harassment based on that characteristic. Personal safety is an issue affecting all members of society.</p> <p>Evidence suggests that a significantly higher percentage of people with disabilities do not have a car within their households in comparison with the wider population.</p> <p>There is a perception that there is a level of anti-social behaviour with young people using public transport which poses a barrier to older people who wish to use these services.</p>

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									A FTA has been carried out on Solihull Connected Transport Strategy which will be considered as part of the development of this Policy.
<b>8. Managing Traffic Demand and Reducing Congestion</b>									Issues relating to accessibility of transport covered above under Policy 7. However for those who are disabled and older people are more likely to need access to a Motability Car and disabled parking.
<b>9. Climate Change</b>									<p>Climate change is a global issue and will affect everyone in Solihull. Impacts of climate change such as excessive temperatures could have greater impact on vulnerable groups such as the elderly, ill, disabled, and pregnant women.</p> <p>The principle of minimising climate change underpins all policies forming the Local Plan. This policy relates to the more technical aspects of that – such as standards for new developments and the usage of appropriate water management systems.</p> <p>A Fair Treatment Assessment has been carried out on the Affordable Warmth Strategy which identifies the greater impact on vulnerable groups such as older people and disabled people; targeted interventions are being used to minimise this impact. The findings of that assessment will inform the development of the Climate Change Policy.</p>
<b>10. Natural Environment</b>									<p>Issues relating to public access etc covered above under Policy 11.</p> <p>Equalities considerations to be considered alongside Policy 11 – Provision for Open Space, Children’s Play, Sport and Recreation.</p>
<b>11. Water management</b>									No issues identified.
<b>12. Resource Management</b>									No issues identified.



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13. Minerals									No issues identified.
14. Amenity 14A. on 'Digital Infrastructure and Telecommunications'									No issues identified.
15. Securing Design Quality									<p>Good design can improve safety and reduce fear of crime.</p> <p>Research has shown that there is a relationship between the fear of crime and all of the protected characteristics. In some cases this may be an outright fear of harassment based on that characteristic.</p> <p>Ensuring that new homes are adaptable to the needs of the occupants is particularly relevant for disabled people and our ageing population.</p>
16. Conservation of Heritage Assets and Local Distinctiveness									There may be some differences in what different ethnic groups consider to be important in terms of local heritage.
17A. Countryside and Green belt P17B. Green Belt compensation									No issues identified.
18. Health and Well being									It is recognised that poor diet is a significant factor in obesity and associated poor health. The Plan aims to provide opportunities to consume fresh food and seeks to manage the concentration of hot food takeaways, particularly around schools.
19. Range and Quality of Local Services									<p>Some Black, Asian and Minority Ethnic communities may require access to facilities or businesses which provide services specifically for them. This can include community centres or shops. They can also face barriers to accessing other services due to a lack of cultural sensitivity, language barriers or discrimination.</p> <p>It has been reported that disabled people are significantly less</p>

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	Yellow	Green	Yellow	Green	Green	Green	Green	Green	likely to participate in cultural, leisure and sporting activities than the wider population, with approximately 50% of all disabled people in the UK experiencing difficulty in going to the cinema, eating out or going shopping (3).
<b>20. Provision for Open Space, Children’s Play, Sport and Recreation</b>	Yellow	Yellow	Red	Red	Yellow	Yellow	Yellow	Yellow	<p>Good design can improve safety and reduce fear of crime.</p> <p>Research has shown that there is a relationship between the fear of crime and all of the protected characteristics. In some cases this may be an outright fear of harassment based on that characteristic. Personal safety is an issue affecting all members of society.</p> <p>Loss of ‘underused’ parks and open spaces to development could impact negatively on those groups who traditionally live in disadvantaged areas – including younger people and some ethnic groups, with poor access to gardens and open space otherwise.</p> <p>Of particular importance to younger and older people is their ability to access good quality parks and open spaces e.g. for sport, walks and general recreation.</p> <p>Fair Treatment Assessments/Equality Impact Assessments have been carried out on Parks/Play areas, Leisure Centres, Physical Activity Service and Community Sports Service which will be considered as part of the development of this Policy.</p>
<b>21 Developer Contributions and Infrastructure Provision</b>	Green	Green	Green	Green	Green	Green	Green	Green	No issues identified.

Sources:

(1) Office of National Statistics “National Housing Statistics Focus on Gender” (2006)

(2) Department of Communities and Local Government “*Survey of English Housing 2007/08*” (January 2009) quoted on [http://england.shelter.org.uk/housing\\_issues/Improving\\_social\\_housing/who\\_gets\\_social\\_housing](http://england.shelter.org.uk/housing_issues/Improving_social_housing/who_gets_social_housing)

(3) <http://www.disabilityaction.org/business-services/access/key-facts-about-access/>

(4) National Travel Survey (July 2010) quoted on <http://www.poverty.org.uk/75/index.shtml?7>

(5) McGukin N & Nakamoto Y “Differences in Trip Chaining by Men & Women” (2004)  
<http://onlinepubs.trb.org/onlinepubs/conf/CP35v2.pdf>

Equality & Human Rights Commission “*Triennial Review Executive Summary*” (2010) page 18

Carter M “Gender differences in Experience with and Fear of Crime in relation to Public Transport” (2004)  
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(Richardson EA & Mitchell R “Gender differences in relationships between urban green space and health in the United Kingdom” (2010) *Social Science & Medicine* 71(3):568-75

DPTAC “*Attitudes of Disabled People to Public Transport*” (2001)  
<http://dptac.independent.gov.uk/pubs/research/apt/03.htm>