Cardiff Local Development Plan
2006 - 2026

Equalities Impact Assessment Report
September 2013
CARDIFF DEPOSIT LOCAL DEVELOPMENT PLAN 2006 - 2026

Equality Impact Assessment

September 2013

Strategic Planning
Cardiff County Council
County Hall
Cardiff
CF10 4UW
Introduction

1.1 This report sets out the Equality Impact Assessment (EIA) of the Cardiff Deposit Local Development Plan (2006-2026) and will ensure that equality issues are taken into account throughout the plan process. By making the Equality Impact Assessment (EIA) an iterative process it will help to ensure that the Local Development Plan promotes equality and diversity and does not adversely affect or discriminate against any of the ‘protected’ groups.

1.2 Publicising the Equality Impact Assessment as one of the supporting documents for the Deposit Local Development Plan will also allow the assessment to inform stakeholder views about the content of the document, and provide transparency as to the Council’s commitment to consider equality implications as part of the planning policy preparation process.

What is an Equality Impact Assessment?

1.3 The Public Equality Duty requires the Council to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relation between different communities. This means that, in the formative stages of our policies, procedure, practice or guidelines, the Council needs to take into account what impact its decisions will have on people who are protected under the Equality Act 2010 (people who share a protected characteristic of age, sex, race, disability, sexual orientation, gender reassignment, pregnancy and maternity, and religion or belief).

Why is an Equality Impact Assessment necessary?

1.4 Local Authorities have a duty to assess and consult on the impact of their proposed policies on the promotion of equality. Equality Impact Assessments are a systematic way of meeting this duty. Local Authorities may not be aware that their policies and services are affecting different groups in different ways. An Equality Impact Assessment will make them better informed and help mitigate against any potential effects.

The Equality Impact Assessment (format)

1.5 The structure of the assessment is based around a template proforma, which firstly asks for a description of the policy, function or programme to be assessed. The majority of the proforma asks a series of questions about the potential positive or negative impacts of the Local Development Plan on protected characteristic groups. These important equality groups can be summarised as follows:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
1.6 The final section of the EIA template identifies actions in response to the issues raised in the report, including timescales and resource implications.

**Consultation on Equality Impact Assessment**

1.7 The Cardiff LDP EIA has been reviewed by the Council’s Citizen Focused Team and Members of the Equality Assessment Group facilitated by Diverse Cymru (see list of below). Comments made by the Group and responses are included in Parts 2 and 3 of this report.

**Name & Organisation**

- Terry Price – Director, Scarman Cymru Enterprises
- Charles Willie - Diverse Cymru Chief Executive
- Ele Hicks - Diverse Cymru Social Policy & Funding Officer
- Bethan Roberts - Equality Consultant & Trainer
- Adele Goodwin - Diverse Cymru Training & Consultancy Manager
- Mel Squire – Equality Consultant & Trainer
- Paul Warren – Diverse Cymru, Director of Policy & Planning
- Michael Flynn – Diverse Cymru, Director of Information & Communications
- Colin Heyman – Diverse Cymru, Training Delivery Manager
- Mark Williams, Diverse Cymru, Training Delivery Manager

1.8 This report includes the following parts:

- Part 1 - Cardiff Council Equality Impact Assessment Corporate Assessment Template
- Part 2 - Comments on “Working Draft No Status” Deposit LDP made by the Equality Assessment Group facilitated by the Diverse Cymru.
- Part 3 - Cardiff Council responses to comments made by Equality Assessment Group including details on changes made to the final Deposit Plan.
Part 1

Cardiff Council
Equality Impact Assessment
Corporate Assessment Template
Policy/Strategy/Project/Procedure/Service/Function Title:
Deposit Local Development Plan

New/Existing/Updating/Amending:

Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?

Name: James Clemence  
Job Title: Operational Manager Planning Policy

Service Team: Strategic Planning  
Service Area: Strategic Planning, Highways and Traffic and Transportation

Assessment Date: July 2013

1. What are the objectives of the Policy/Strategy/Project/Procedure/Service/Function?

The Deposit LDP is an important stage in the plan preparation process. It contains an overall Strategy to guide the future growth and development of Cardiff to 2026 responding to economic, social and environmental needs together with land use allocations and detailed policies.

The purpose of the plan is to put in place a framework to manage future growth and create sustainable neighbourhoods of the highest possible quality design which have the right range of facilities at the right time.

The plan will provide a framework for the sustainable delivery of new development areas and infrastructure.

Main elements of Strategy include:

1. Making provision for new homes and jobs.
2. Putting in place a framework to manage future growth and encourage high quality, sustainable design.
4. Delivering sustainable transportation solutions.
5. Responding to evidenced economic needs.
6. Responding to evidenced social needs.
7. Respecting Cardiff’s environment and responding to climate change.
2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]

The following background information is considered relevant:

- National Planning Guidance produced by the Welsh Government such as TAN12 Design and BS8300 Part M of the Building Regulations.
- National statistics relating population and household growth and to the equality strands where available
- The document sets out the key social trends and issues including issues relating to Gypsy and Travellers, Welsh Language, age and Ethnic minorities.
- Local Housing Market Assessment Update July 2013
- Gypsy and Traveller Accommodation Needs Assessment April 2013 undertaken by ORS

Inclusive, sustainable communities and local access to community facilities and services should ensure that the needs, barriers and concerns of each protected characteristic group are identified and incorporated into the planning process.

Main Principles
These main principles should underpin the Local Development Plan. They are as follows:

Evidence
- This is required to make it clear that the Plan has taken into account the needs of all people;
- This is required to assist reader to understand why a decision regarding a priority has been made e.g. new homes for families: e.g. contextual data, such as, current and projected statistics regarding population and demography and references to data sources and information could include the Census 2011; Neighbourhood Assessment Reports (Cardiff Council 2012); Everyone Matters (Cardiff Council 2012-16 Strategic Equality Plan); The Wales Index of Multiple Deprivation 2008; Office for National Statistics and other published reports regarding e.g. housing, travel, employment, health; Community Safety 2009/10 Crime Incident Data; Hate Crime Statistics; Welsh Government Anti-Poverty Strategies;
- Need to consider what the Council is doing regarding equality data collation;
- Need to reference evidence from engagement events

Language and Terminology
- Non inclusive language and terms including those that could be offensive should be avoided. Terms like accessible and inclusive should be defined.
**Health Impact Assessment**
- Consideration could be given to completing a HIA. The issue of how health inequalities will be reduced could have major implications for PC groups. There is a large body of evidence which shows that groups that are stigmatised in society experience poorer physical and mental health as a result of the discrimination and stigma they face.

**Accessible & Inclusive Environments for All (including Housing)**
- The Deposit LDP details the underlying principles and research that have informed the Council's approach to future land use but the lower level plans i.e. the planning guidance must ensure that the design process delivers accessible and inclusive environments having regard in particular to best practice standards set out in Part M of the Building Regulations and TAN12 Design and other related documents.

**Accessible Public Transport, Travel and Parking**
- Guidance is required to ensure that public transport and accessible parking meets the requirements of in particular, people with young children, disabled people and older people.

**Involvement/ Consultation/ Communication**
- Ensure direct engagement with members of PC groups, including those who may not traditionally choose to do so or may have been over looked, such as, people living in residential homes and gypsy traveller communities.
- Ensure engagement with internal Cardiff Council Groups including Cardiff Council Access Focus Group and 50+ forum.
- Ensure best practice regarding access and involving and communicating with PC groups.
- There needs to be a plan for engagement.

**Safety**
- Community safety is a key issue for all PC groups. A main way of addressing the issue of the fear of crime (e.g. sexual assaults, hate crime) is by ensuring good design in providing accessible and inclusive environments.

**Community cohesion**
- Aiming to avoid dangers of divided communities by identifying local cohesion issues.
- Refer to Anti-Poverty Strategies.
3 Assess Impact on the Protected Characteristics

3.1 Age
Will this Policy/Strategy/Project/Procedure/Service/Function have a differential impact [positive/negative/] on younger/older people?

<table>
<thead>
<tr>
<th>Age Range</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 18 years</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18 - 65 years</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Over 65 years</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The Plan aims to provide for an appropriate mix of dwelling types and sizes, including housing suitable for older people.

Furthermore, the pressure on younger people arising from house prices compared to incomes is recognised and the Preferred Strategy also aims to provide affordable and a range and choice of homes.

Where possible locating development towards areas where there are already a range of services and facilities and providing new services and facilities where there is a deficiency – this will assist non-car owners.

The Plan supports development that can be designed to adapt to the changing needs of its occupants.

Age may be a factor when encouraging engagement in the LDP process, particularly the publication of material on the internet. The use of a range of consultation techniques is therefore important (i.e. postal correspondence).

What action(s) can you take to address the differential impact?

Relevant Policies

- Policy KP13 Responding to Evidenced Social Needs
- Provides for a range of dwelling sizes, types and affordability to meet specific needs, particularly for family units. The need to address affordable housing is set out in Policy H3.
- Aims to secure sustainable communities by promoting a culture in which diversity is valued and equality of opportunity is a reality. Specifically the policy encourages the enhancement of communities through promoting better equality of access for all groups in society and creating places that encourage social interaction and cohesion. The Policy sets out principles for developing sustainable neighbourhoods, including providing a full range of accessible social, health, leisure and education facilities. Policy C1 Community Facilities encourages the provision of community facilities, health and religious facilities in locations that accessible to the local
community by public transport, walking and cycling. Policies R5 District Centres, R6 Local Centres and R8 Local Shopping Parades aim to protect existing shopping centres and local shops. Policy C3 Protection of Open Space aims to protect existing open space and Policies C4, C5 and C6 aim to provide new areas of open space, allotments and community growing areas and children’s play areas in conjunction with new development.

- Policy KP5 Good Quality and Sustainable Design aims to foster inclusive design by ensuring buildings, streets and spaces are accessible to all users and that housing is adaptable to future changes in lifestyle.
- Policy KP8 Sustainable Transport aims to maximise sustainable travel modes, including public transport, provide for people with special access and mobility requirements and improve safety for all travellers. Policy T3 Transport Interchanges supports improvements to rail and bus interchanges, including measures to facilitate access to people with special needs. Policy T4 Regional Transport Hub supports the development of infrastructure and service around Cardiff Central Railway station that meets the access needs of all users. Policy T5 Managing Transport Impacts supports the provision of transport infrastructure in new development that provides for the needs of people with special access and mobility requirements including people with disabilities and people with young children.
- Policy C8 Planning for Schools and Policy C9 New Educational Facilities provide for new and improved school facilities to meet existing and future educational needs and provide for the development of nursery, primary, secondary and sixth form education in locations well related to neighbourhood services and amenities and easily accessible by sustainable transport modes.

3.2 Disability
Will this Policy/Strategy/Project/Procedure/Service/Function have a differential impact [negative] on disabled people?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hearing Impairment</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Physical Impairment</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Visual Impairment</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Learning Disability</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Long-Standing Illness or Health Condition</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mental Health</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Substance Misuse</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

Where possible locating development towards areas where there are already a
range of services and facilities and providing new services and facilities where there is a deficiency – this will assist non-car owners.

Supporting development that can be designed to adapt to the changing needs of its occupants.

Requiring development to have safe and satisfactory access disabled people.

Provide material in appropriate formats on request and consultation events at locations which are accessible to all.

What action(s) can you take to address the differential impact?

Relevant Policies

- Policy KP4 Masterplanning Approach aims to ensure that walking, cycling and public transport are attractive sustainable travel choices in new developments and that accessible and mixed use neighbourhood centres are provided with a full range of social and community facilities in large new developments.

- Policy KP5 Good Quality and Sustainable Design aims to foster inclusive design by ensuring buildings, streets and spaces are accessible to all users and that housing is adaptable to future changes in lifestyle.

- Policy KP8 Sustainable Transport aims to maximise sustainable travel modes, including public transport, provide for people with special access and mobility requirements and improve safety for all travellers. Policy T3 Transport Interchanges supports improvements to rail and bus interchanges, including measures to facilitate access to people with special needs. Policy T4 Regional Transport Hub supports the development of infrastructure and service around Cardiff Central Railway station that meets the access needs of all users. Policy T5 Managing Transport Impacts supports the provision of transport infrastructure in new development that provides for the needs of people with special access and mobility requirements including people with disabilities and people with young children.

- Policy KP13 Responding to Evidenced Social Needs sets out principles for developing sustainable neighbourhoods, including providing a full range of accessible social, health, leisure and education facilities. Policy C1 Community Facilities encourages the provision of community facilities, health and religious facilities in locations that accessible to the local community by public transport, walking and cycling. Policies R5 District Centres, R6 Local Centres and R8 Local Shopping Parades aim to protect existing shopping centres and local shops. Policy C3 Protection of Open Space aims to protect existing open space and Policies C4, C5 and C6 aim to provide new areas of open space, allotments and community growing areas and children’s play areas in conjunction with new development.

- Policy KP14 Healthy Living and Policy C7 Heath aim to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants for health and providing accessible health care facilities. Action to reduce health inequalities needs to address differences between
3.3 Gender Reassignment

Will this Policy/Strategy/Project/Procedure/Service/Function have a differential impact [positive/negative] on transgender people?

<table>
<thead>
<tr>
<th>Transgender People</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>(People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the Plan is likely to have an adverse effect on this group

It is considered that little is known of the particular needs of this group and this is a gap that will require future consideration in order to make a comprehensive assessment.

Need to ensure engagement events are held at varying times during the day to ensure all genders can contribute to the process.

What action(s) can you take to address the differential impact?

Relevant Policies

- Policy KP14 Healthy Living and Policy C7 Heath aim to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants for health and providing accessible health care facilities. Groups such as transgender people who are stigmatised in society generally have poorer levels of health due to the stigma / discrimination.

- Policy KP5 Good Quality and Sustainable Design aims to ensure that all new development provides a healthy and convenient environment for all users that supports the principles of community safety. Policy KP8 Sustainable Transport aims to improve safety for all travellers. Policy C2 Community Safety/Creating Safe Environments aims to ensure that all new development is designed to promote safe and secure environment and minimises the opportunity of crime. Measures include maximising natural surveillance, promotion of well defined routes and a good standard of lighting. Policy T5 Managing Transport Impacts aims to provide safe and convenient provision of transport infrastructure in conjunction with
new developments. Measures include safe and convenient pedestrian access to and movement within development, including pedestrian priority measures, lighting and security. These policies combined will help improve safety for transgender people who are at risk of hate crime, stigma.

3.4. Marriage and Civil Partnership
Will this Policy/Strategy/Project/Procedure/Service/Function have a differential impact [positive/negative] on marriage and civil partnership?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marriage</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Civil Partnership</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

This has been considered and it is not anticipated that the Plan is likely to have an adverse effect on this group.

What action(s) can you take to address the differential impact?

3.5 Pregnancy and Maternity
Will this Policy/Strategy/Project/Procedure/Service/Function have a differential impact [positive/negative] on pregnancy and maternity?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pregnancy</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Maternity</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The pool currently operates a session in the “Bump into Action” programme for pre and ante natal women. The pregnancy and maternity group will be influenced most by the location of housing in relation to health care facilities and employment opportunities. It is
important that this group has easy access to such facilities and opportunities so that they are not isolated from their communities.

In terms of the Plan, it will facilitate an appropriate level of housing development to be located near to these facilities and opportunities and/or in accessible locations that have an efficient transport network. The location of development in terms of accessibility by different transport modes will also be important.

What action(s) can you take to address the differential impact?

Relevant Strategic Policies

- Policy KP4 Masterplanning Approach aims to ensure that accessible and mixed use neighbourhood centres are provided with a full range of social and community facilities in large new developments. Policy KP13 Responding Evidenced Social Needs sets out principles for developing sustainable neighbourhoods, including providing a full range of accessible social, health, leisure and education facilities. Policy C1 Community Facilities encourages the provision of community facilities, health and religious facilities in locations that accessible to the local community by public transport, walking and cycling.
- Policy KP14 Healthy Living and Policy C7 Heath aim to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants for health and providing accessible health care facilities.

3.6 Race
Will this Policy/Strategy/Project//Procedure/Service/Function have a differential impact [positive/negative] on the following groups?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mixed / Multiple Ethnic Groups</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian / Asian British</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Black / African / Caribbean / Black British</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Ethnic Groups</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The LDP Deposit Plan includes aims and objectives on equalities.

Consultation and engagement with relevant groups and Diverse Cymru. Important to consider language barriers to engagement and advice will be sought from the Council’s Citizens Focused Team and Diverse Cymru to address this issue.
As Plan is prepared it is important to review potential impacts on particular groups that are not known at this stage.

What action(s) can you take to address the differential impact?

Relevant Policies

- **Policy KP13 Responding to Evidenced Social Needs**
  - Provides for a range of dwelling sizes, types and affordability to meet specific needs, particularly for family units. The need to address affordable housing is set out in Policy H3. BME communities sometimes require larger house types to accommodate large families and this policy will enable the provision of such accommodation.
  - Aims to secure sustainable communities by promoting a culture in which diversity is valued and equality of opportunity is a reality. Specifically the policy encourages the enhancement of communities through promoting better equality of access for all groups in society and creating places that encourage social interaction and cohesion.
  - The Policy also sets out principles for developing sustainable neighbourhoods, including providing a full range of accessible social, health, leisure and education facilities. Policy C1 Community Facilities encourages the provision of community facilities, health and religious facilities in locations that accessible to the local community by public transport, walking and cycling. Policies R5 District Centres, R6 Local Centres and R8 Local Shopping Parades aim to protect existing shopping centres and local shops. Policy C3 Protection of Open Space aims to protect existing open space and Policies C4, C5 and C6 aim to provide new areas of open space, allotments and community growing areas and children’s play areas in conjunction with new development.

- **Policy KP14 Healthy Living and Policy C7 Heath** aim to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants for health and providing accessible health care facilities.

- **Policies H7 and H8** aim to provide for the identified need for accommodation for Gypsies and Travellers.

- **Policy KP5 High Quality and Sustainable Design** aims to ensure that all new development provides a healthy and convenient environment for all users that supports the principles of community safety. Policy KP8 Sustainable Transport aims to improve safety for all travellers. Policy C2 Community Safety/Creating Safe Environments aims to ensure that all new development is designed to promote safe and secure environment and minimises the opportunity of crime. Measures include maximising natural surveillance, promotion of well defined routes and a good standard of lighting. Policy T5 Managing Transport Impacts aims to provide safe and convenient provision of transport infrastructure in conjunction with new developments. Measures include safe and convenient pedestrian access to and movement within development, including pedestrian priority measures, lighting and security. These policies combined will help address the potential for race hate crime and racial harassment.
3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a differential impact [positive/negative] on people with different religions, beliefs or non-beliefs?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buddhist</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Christian</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hindu</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Humanist</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jewish</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Muslim</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sikh</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the Plan is not likely to have a significant adverse effect on this group.

Some religious groups may require purpose built accommodation and these issues will be considered at the detailed master planning stage.

There may also be a need to carefully consider the timing and location of consultation events.

What action(s) can you take to address the differential impact?

Relevant Policies

- Policy KP4 Masterplanning Approach aims to ensure that accessible and mixed use neighbourhood centres are provided with a full range of social and community facilities in large new developments. Policy C1 Community Facilities encourages the provision of community facilities, health and religious facilities in locations that accessible to the local community by public transport, walking and cycling.
- Policy KP17 Built Heritage and Policy EN9 Conservation of the Historic Environment protect built heritage including religious buildings of historic and cultural importance.
3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a differential impact [positive/negative] on men and/or women?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Men</td>
<td></td>
<td>✓</td>
<td>N/A</td>
</tr>
<tr>
<td>Women</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

*In sections of the population, women may have more limited mobility in single car households which could lead to some isolation (30% of households are without a car in Cardiff). The focus of new development with good public transport will ensure that this group have an improved equality of access to services, employment etc.*

*Increasing the accessibility of the built environment, public transport and housing and improving access to services will benefit both men and women but will be particularly beneficial to people with caring responsibilities.*

*Need to ensure engagement events are held at varying times during the day to ensure all genders can contribute to the process.*

What action(s) can you take to address the differential impact?

**Relevant Policies**

- Policy KP4 Masterplanning Approach aims to ensure that walking, cycling and public transport are attractive sustainable travel choices in new developments and that accessible and mixed use neighbourhood centres are provided with a full range of social and community facilities in large new developments.
- Policy KP5 Good Quality and Sustainable Design aims to foster inclusive design by ensuring buildings, streets and spaces are accessible to all users and that housing is adaptable to future changes in lifestyle.
- Policy KP8 Sustainable Transport aims to maximise sustainable travel modes, including public transport, provide for people with special access and mobility requirements and improve safety for all travellers. Policy T3 Transport Interchanges supports improvements to rail and bus interchanges, including measures to facilitate access to people with special needs. Policy T4 Regional Transport Hub supports the development of infrastructure and service around Cardiff Central Railway station that meets the access needs of all users. Policy T5 Managing
Transport Impacts supports the provision of transport infrastructure in new development that provides for the needs of people with special access and mobility requirements including people with disabilities and people with young children.

- Policy KP13 Responding Evidenced Social Needs sets out principles for developing **sustainable neighbourhoods**, including providing a full range of accessible social, health, leisure and education facilities. Policy C1 Community Facilities encourages the provision of community facilities, health and religious facilities in locations that accessible to the local community by public transport, walking and cycling. Policies R5 District Centres, R6 Local Centres and R8 Local Shopping Parades aim to protect existing shopping centres and local shops. Policy C3 Protection of Open Space aims to protect existing open space and Policies C4, C5 and C6 aim to provide new areas of open space, allotments and community growing areas and children’s play areas in conjunction with new development.

- Policy KP14 Healthy Living and Policy C7 Heath aim to reduce **health inequalities** through encouraging healthy lifestyles, addressing the social determinants for health and providing accessible health care facilities. There are many health inequalities along gender lines. For example women experience poorer mental health, men have lower life expectancy. The action on health inequalities needs to explicitly address gender inequalities.

- Policy KP5 Good Quality and Sustainable Design aims to ensure that all new development provides a healthy and convenient environment for all users that supports the principles of **community safety**. Policy KP8 Sustainable Transport aims to improve safety for all travellers. Policy C2 Community Safety/Creating Safe Environments aims to ensure that all new development is designed to promote safe and secure environment and minimises the opportunity of crime. Measures include maximising natural surveillance, promotion of well defined routes and a good standard of lighting. Policy T5 Managing Transport Impacts aims to provide safe and convenient provision of transport infrastructure in conjunction with new developments. Measures include safe and convenient pedestrian access to and movement within development, including pedestrian priority measures, lighting and security. These policies combined will help address the vulnerability of women to sexual violence and to young men’s greater risk of physical assault.

### 3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact** [positive/negative] on the following groups?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bisexual</td>
<td>✓</td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td>Gay Men</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Equality Impact Assessment 17
Please give details/consequences of the differential impact, and provide supporting evidence, if any.

It is not anticipated that the Plan is likely to have an adverse effect on Lesbian, Gay and Bisexual people at this stage of Plan development.

Gaps in evidence mean relatively little is known about inequality faced by lesbian, gay, bisexual and transgender people. The lack of evidence and the small size of the groups concerned does not mean that there are no inequalities to address. What evidence exists suggest many of these groups face inequality and discrimination such as bullying, hate crime and harassment. A small proportion of the Welsh population (1.7%) say they are gay, lesbian or bisexual (although this is likely to be a significant under estimation). The number of transgendered people is unknown.

Need to ensure engagement events are held at varying times during the day to ensure all can contribute to the process.

What action(s) can you take to address the differential impact?

Relevant Policies

- Policy KP14 Healthy Living and Policy C7 Health aim to reduce health inequalities through encouraging healthy lifestyles, addressing the social determinants for health and providing accessible health care facilities. Groups such as Lesbian, Gay and Bisexual people who are stigmatised in society generally have poorer levels of health due to the stigma / discrimination.

- Policy KP5 Good Quality and Sustainable Design aims to ensure that all new development provides a healthy and convenient environment for all users that supports the principles of community safety. Policy KP8 Sustainable Transport aims to improve safety for all travellers. Policy C2 Community Safety/Creating Safe Environments aims to ensure that all new development is designed to promote safe and secure environment and minimises the opportunity of crime. Measures include maximising natural surveillance, promotion of well defined routes and a good standard of lighting. Policy T5 Managing Transport Impacts aims to provide safe and convenient provision of transport infrastructure in conjunction with new developments. Measures include safe and convenient pedestrian access to and movement within development, including pedestrian priority.
measures, lighting and security. These policies combined will help improve safety for Lesbian, Gay and Bisexual people who are at risk of hate crime and homophobic/biphobic abuse.

### 3.10 Welsh Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a differential impact [positive/negative] on Welsh Language?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

*Ensure compliance with Council’s Welsh Language Scheme and consult with Council’s Welsh Language unit. And the newly established Office of the Welsh Language Commission*

**What action(s) can you take to address the differential impact?**

### 4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

*The consultation document provides an opportunity for organisations and individuals to comment on the proposed Deposit LDP and represents a critical step in the preparation of the Plan.*

*All comments made at this stage will be considered by an Independent Inspector at Examination.*

*Details on the consultation arrangements are set out in the LDP Delivery Agreement which includes a community involvement scheme setting out in detail how the Council is going to engage with the local community in the preparation of the LDP.*
5. **Summary of Actions [Listed in the Sections above]**

<table>
<thead>
<tr>
<th>Groups</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>Consider an appropriate range and choice of consultation measures.</td>
</tr>
<tr>
<td>Disability</td>
<td>Take into account disability considerations when determining the locations of consultation and engagement events.</td>
</tr>
<tr>
<td>Gender Reassignment</td>
<td>Ensure engagement events are held at varying times during the day to ensure all can contribute to the process.</td>
</tr>
<tr>
<td>Marriage &amp; Civil Partnership</td>
<td></td>
</tr>
<tr>
<td>Pregnancy &amp; Maternity</td>
<td>Ensure engagement events are held at varying times during the day to ensure all can contribute to the process.</td>
</tr>
<tr>
<td>Race</td>
<td>Seek advice from the Council’s Equality Unit and Diverse Cymru on overcoming Language barriers during key consultation and engagement stages.</td>
</tr>
<tr>
<td>Religion/Belief</td>
<td>Take into account specific requirements when considering the timings and location of consultation and engagement events.</td>
</tr>
<tr>
<td>Sex</td>
<td>Ensure engagement events are held at varying times during the day to ensure all genders can contribute to the process.</td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>Ensure engagement events are held at varying times during the day to ensure all can contribute to the process.</td>
</tr>
<tr>
<td>Welsh Language</td>
<td>Continued compliance with Council’s Welsh Language Scheme with support from the Council’s Welsh Language unit and the Office of the Welsh Language Commission.</td>
</tr>
<tr>
<td>Generic Over-Arching [applicable to all the above groups]</td>
<td>Work with the Council's Equality Unit and Diverse Cymru and other specific groups to help make the engagement and consultation processes accessible and appropriate for all protected characteristics.</td>
</tr>
</tbody>
</table>

6. **Further Action**
Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area’s Business Plan to be monitored on a regular basis.

7. **Authorisation**

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

<table>
<thead>
<tr>
<th>Completed By:</th>
<th>Date: July 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stuart Williams</td>
<td></td>
</tr>
<tr>
<td>Designation: Group Leader (Policy)</td>
<td></td>
</tr>
<tr>
<td>Approved By:</td>
<td></td>
</tr>
<tr>
<td>James Clemence</td>
<td></td>
</tr>
<tr>
<td>Designation: Operational Manager Planning Policy</td>
<td></td>
</tr>
<tr>
<td>Service Area:</td>
<td>Strategic Planning</td>
</tr>
</tbody>
</table>

7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate’s Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 3059 or email citizenfocus@cardiff.gov.uk
Part 2

Comments on “Working Draft No Status” Deposit LDP made by the Equality Assessment Group facilitated by Diverse Cymru
Background Information

The Equality Act 2010

The Equality Act brought together previous disparate pieces of equality legislation to more effectively tackle disadvantage and discrimination. The Act sets out the following ‘protected characteristic’ groups: age; disability; gender reassignment; race; religion or belief; sex; sexual orientation; marriage and civil partnership; pregnancy and maternity.

The Equality Act requires due regard is given to advancing equality. This involves:

- removing or minimising disadvantages experienced by people due to their protected characteristic;
- taking steps to meet the needs of people from protected characteristic groups where there are differences with the needs of other people;
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

General Duty

Public Authorities, under their General Duty, must have due regard to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between people who share relevant protected characteristics and those who do not;
- foster good relations between people who share a protected characteristic and those who do not.

Public Sector Equality Duties

These are set out in the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, which came into force on the 6th April 2011. They cover:

- objectives
- strategic equality plans
- engagement
- assessing impact
- equality information
- employment information
pay differences
staff training
procurement
annual reporting
publishing
welsh minister reporting
review
accessibility

Engagement
Public Authorities must involve people who it considers representative of one or more protected groups and who have an interest in how the authority carries out its functions. This engagement must take place in relation to assessing likely impact of policies being proposed or reviewed.

Assessment of impact
An Equality Impact Assessment involves anticipating the consequences of the Public Authorities functions and policies on protected characteristic groups. They need to make sure that as far as possible any potential adverse impacts are eliminated and that opportunities for maximising opportunities to promote equality are identified.

Reports on assessment must set out:
- the purpose of the policy
- a summary of steps the authority has taken out to carry it out (including relevant engagement)
- a summary of information it has taken into account
- results of the assessment
- decisions taken in relation to the results

The assessment must:
- ensure the policy does not unlawfully discriminate
- identify the potential for an adverse impact on protected characteristic groups
- how the policy could better advance equality of opportunity
- how the policy will affect relations between different groups
• be monitored for impact on protected characteristics groups from the start and as part of subsequent reviews

The actual impact of a new policy will only be known once it has been introduced and implemented. It is therefore crucial that further equality impact assessments are carried out, at key stages of the monitoring process.
Equality Impact Assessment Screening Template

Title of Policy / Procedure / Project / Strategy:

1. What is the aim of the policy / procedure / project / strategy?

The Deposit LDP is an important stage in the plan preparation process. It contains an overall Strategy to guide the future growth and development of Cardiff to 2026 responding to economic, social and environmental needs together with land use allocations and detailed policies.

It aims to:
   a) Defend against countryside development proposals and development by appeal representations.
   b) Control where development takes place.
   c) Ensure new homes, jobs and community benefits are provided.
   d) Respect Cardiff environmental assets and sustainable transportation.
   e) Respond to evidenced social and economic needs.
   f) Bring forward new infrastructure.
   g) Respond to Cardiff’s environment and respond to climate change.

2. What is the purpose of the policy / procedure / project / strategy?

The purpose of the plan is to put in place a framework to manage future growth and create sustainable neighbourhoods of the highest possible quality design which have the right range of facilities at the right time.

The plan will provide a framework for the sustainable delivery of new development areas and infrastructure.

3. Any general comments relating to each equality strand and/or any relevant background information that should be noted in undertaking the assessment?

Equality Information

- The Everyone Matters, Strategic Equality Plan outlines how the SEP fits into the wider partnership structure in Cardiff. Instances of inequality at a city wide level are monitored as part of the multi-agency What Matters delivery structure. Priority work-streams have been agreed by the City’s Integrated Partnership Board which works collaboratively to address inequality and Neighbourhood Action Plans have been developed.
- Whilst there are good references to equality needs and issues there could be more references made to the Council’s Strategic Equality Plan ‘Everyone Matters’ and the ‘What Matters Needs Assessment’. This is critical to ensuring full integration of equality issues and needs and ensuring that opportunities for the LDP to contribute to reducing
inequalities and improving social justice are achieved.
• Socio-economic data, as provided in ‘Everyone Matters’ on, for example, income, unemployment, education, health, housing and crime shows a north/south divide and highlights the key determinant as being income related deprivation. The LPD is central to finding long-term solutions to this.
• Page 30 4-13 there is no information given on make-up of the Citizens Panel of 1028 people, by protected characteristic.
• Page 67, 4.146 The Marmot Review reference is not clear

Engagement
• It could be that one of the “tests of soundness” of the plan factors in whether Citizens are placed at the heart of the plan and that equality is one of the essential pillars.
• A final EIA should be completed and published following wider public engagement/involvement with people who represent one or more protected groups and who have an interest in how the Council will carry out the LPD.
• The current involvement of Diverse Cymru’s Equality Impact Assessment Group’s members in reviewing the Draft No Status LDP and the Council’s Draft EIA of the LDP forms a first step regarding wider engagement. Publication of the EIA would take place following Cabinet and Full Council approval of the LDP.
• As identified to some extent in their EIA, how will the Council make it accessible to people in order to carry out a meaningful consultation? How can they communicate this plan to people in a way in which generally people can understand what they are planning and comment on it?
• Are there any plans to produce the document in other formats to give a wider audience the opportunity to respond. Options to include EasyRead, Large print but also consideration may need to be given to other language versions.
• As identified in the working draft no status version of the LDP the final document will be reduced in length and presented in a more concise and reader friendly manner.

Monitoring
• Assessing the actual impact of the LDP on protected groups will need to take place when more specific action/implementation plans have been proposed and implemented. The EIA can then comment on any specific adverse or differential impacts plus highlight opportunities to promote equal opportunities and inclusion.
• Page 163, 6.2 Will the Annual Monitoring Report (AMR) be required to
comment on equality impacts? Or at the four year review stage?

**Economy/ Jobs**
- Projections are based on both population growth and growth in the labour market and the answers seem to avoid the economic component.
- The plan estimates the arrival of some 40,000 new jobs. There is a current imbalance in jobs meaning some population groups face greater challenges. Will the new jobs address this imbalance or merely reinforce it. What role might the LDP have in shaping the labour market, if any? Is it intended to be a reactive response to whatever growth happens?
- Issues of having good employers allowing for meeting needs of employees with child or caring responsibility, disabled people, an aging workforce, flexible working, and the skills gap where some sections have much higher levels of inactivity. How much would new employers be asked to cater for needs in build to cater for protected characteristics and a balanced recruitment? The same issues surface in potential developments such as shopping centres.

**Transport**
- When looking at issues like transport the working draft no status version of the LDP emphasises the desire to create a more active population, displacing cars but catering for disabled people tends to be tucked away out of sight in it appears in T3 and T5 (p122) but not in other parts. Sometimes the word “may” is used to qualify rather than “should” or “will”.
- The impact on disabled people, older people and those with caring roles has the potential to be quite negative. The Plan touches on the need to consider people with different access needs, however there is a strong drive to promote cycling as the second preferred mode of transport “favourable consideration to cyclists” Page 123 will also need to ensure that this does not disadvantage blue badge holders.

**Community Facilities**
- When looking at new developments great stress is laid upon creating community and other facilities to accompany the perceived needs, helping mitigate any adverse impacts. Good design is mentioned and will make for safer communities unless sacrificed for costs at a later date. What does concern is the viability of new community facilities other than those with a statutory remit. Some of the proposals to create new facilities appears good but may be unrealistic. Should there be a business case requirement for examining the real economic feasibility of communal facilities before plans are agreed?
Housing

- Implementation, especially regarding principles of good design and assessment of housing and employment needs in different geographic areas of Cardiff will need to take account of the needs of each protected characteristic group. To this end a more thorough local area needs assessment is required, which identifies the different needs and issues according to protected characteristic groups. This is particularly true where provision for ‘special needs housing’ is referenced, but not Homes for Life or general adaptable properties.

- Could a definition of ‘affordable’ housing be included in the plan?

- Page 75 - H3 – Affordable Housing. What is meant by “where there is evidence of need”? Figures are not yet in plan

- ‘BME communities sometimes require larger house types to accommodate large/extended families and this policy will enable the provision of such accommodation’. ‘Extended’ should be added to statement in Councils’ draft EIA.

Safety

- The explicit references and policies on community safety, designing out crime and to the needs of different groups are welcome. The specific references to lighting and safe and accessible routes home after dark are an essential part of combating hate crime. There is a need to recognise the different needs of each protected characteristic group in relation to feeling safe and being protected from violence and hate crime in the detailed SPG to follow the Deposit LDP.

- The inclusion of safety considerations, as well as distance and accessibility within transportation, and particularly regarding public transport, is very welcome and should assist in ensuring that hate crime and incidents are reduced.

Terminology

Page 24, 2(b) replace ‘... the elderly, the disabled …’ with ‘... older people, disabled people …’

Page 55 iv replace ‘...special ...’ with ‘...particular ...’

Page 65 - 4.136 uses the term “special needs” replace with disabled people

Page 70, 4.154 replace ‘...the very young, the old, and mobility-impaired’
persons...’ with ‘...young people (and/or children – not clear to which group ‘the very young’ refers), older people and people with mobility impairments ...’

Page 76 5.9. ‘...the Council has a duty to have regard to the disabled..’ the disabled should be replace with ‘disabled people’. Furthermore ‘many of whom are best housed in the community’ – suggest saying ‘the majority of whom are best housed in the community’

Page 85, 5.48 It perhaps goes without saying that these spaces will be accessible, or should this be made explicit?

Page 117, 5.204 Car free-zones could exclude disabled people who need to use their car.
Page 120: T3 2 replace ‘...people with special access needs ...’ with ‘...disabled people with particular access needs ...’

General point – the interchanges need to be accessible to disabled travellers and people with prams / young children

Page 122: T5 (ii) replace ‘...people with special access and mobility requirements ...’ with ‘...disabled people with mobility impairments and particular access needs ...’

Page 122 ii remove ‘special’; remove ‘special’ from 5.221 iii and 5.222 first bullet point and replace ‘people with disabilities’ with ‘disabled people’.
Page 122: T5 add (xi) people with prams and /or young children

Page 122: 5.221 (iii) replace ‘...people with special access and mobility requirements ...’ with ‘...disabled people with mobility impairments and particular access needs ...’

Page 122: 5.222 Split first bullet point as above as it is important to keep in mind the needs of both groups of people

Page 148 C8 and page 149 C9 – perhaps it goes without saying that these educational facilities will be accessible to disabled pupils and disabled students?

Policy T5 Managing Transport Impacts (Page 122) supports the provision of transport infrastructure in new development that provides for the needs of people with access and mobility requirements including disabled people and people with young children. Remove ‘special’ and ‘with disabilities’ used in statement in Council’s draft EIA.
4. Could the policy / procedure / project / strategy have a differential impact on the following groups (please complete for all groups):

<table>
<thead>
<tr>
<th>Race or Ethnicity (Including ethnic origin, colour, nationality and Gypsies / Travellers)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is there an adverse or the potential for an adverse impact?</td>
</tr>
<tr>
<td>☐ IF YES</td>
</tr>
<tr>
<td>Please give reasons / justifications</td>
</tr>
</tbody>
</table>

Please note should the following be taken into account, the LDP would **not** have the potential for an adverse impact. However, the actual impact will need to be monitored throughout the introduction and implementation of the LDP, at annual monitoring reviews and the 4 yearly review stage.

The LDP needs to provide information regarding how BME socio-economic deprivation issues will be addressed. Employment rates and average earnings are low within some BME groups in Cardiff who tend to be concentrated around the most deprived areas of the city. For example, in Cardiff the total number of people age 16-64 in work is 64.3% however, the rate for ethnic minority groups is significantly lower at 48.1% (page 9 Everyone Matters, Strategic Equality Plan, Cardiff Council). Half of Pakistani and Bangladeshi people are not in employment or full time education. This rises to 74% for Pakistani and Bangladeshi women (How fair is Wales, EHRC report).

Neighbourhood Action Plans have been developed by Cardiff Council which should complement the LDP regarding addressing the need for targeted initiatives designed to address socio-economic inequality.

The increase in affordable housing needs to ensure that ethnic minority communities still have access to community services (e.g. halal food, gurdwara, etc) but also ensure plans need to ensure that they are not ‘ghettoised’.

It is not clear from the document whether the Gypsy & Traveller communities have been consulted in respect of proposal for new sites and whether these meet their needs.

☐ IF NO

Please give reasons / justifications

Policy H3 relating to affordable housing could have a disproportionate positive impact on some BME groups who have lower average incomes than the general population.
If Adjustments are identified please list in Actions Template

<table>
<thead>
<tr>
<th>Sex</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is there an adverse or the potential for an adverse impact?</td>
</tr>
<tr>
<td>☐ IF YES</td>
</tr>
</tbody>
</table>

Please give reasons / justifications

Please note should the following be taken into account, the LDP would not have the potential for an adverse impact. However, the actual impact will need to be monitored throughout the introduction and implementation of the LDP, at annual monitoring reviews and the 4 yearly review stage.

Consideration of labour market issues such as affordable childcare, adequate childcare facilities, flexible working practices need to be considered to attract in particular lone parents (9 out of 10 being women) and carers.

There is an urgent need to ensure that provision of temporary accommodation and supported housing developments are included within the LDP for women fleeing from domestic violence.

☐ IF NO

Please give reasons / justifications

The following should amendments should be made to the Council’s draft EIA:

Increasing the accessibility of the built environment, public transport and housing and improving access to services will benefit both men and women but will be
particularly beneficial to people with caring responsibilities, who are predominantly women. ‘who are predominately women’ should be added to statement in Council’s draft EIA.

Policy KP8 Sustainable Transport (Page 54) aims to maximise sustainable travel modes, including public transport, provide for people with people with prams / young children (who are predominantly women) and improve safety for all travellers. ‘who are predominantly women’ should be added to statement in Council’s draft EIA

If Adjustments are identified please list in Actions Template

Gender Reassignment
Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

Please note should the following be taken into account, the LDP would not have the potential for an adverse impact. However, the actual impact will need to be monitored throughout the introduction and implementation of the LDP, at annual monitoring reviews and the 4 yearly review stage.

There is no reference within the document to transgender people. There are significant barriers to employment for transgender people. Information and education initiatives for employers are required to ensure that they can be inclusive of transgender people and eliminate discrimination. There needs to be a range of employment opportunities created as many transgender people still feel unable or unsafe to work in public-facing job roles.

Housing is often a significant issue for transgender people. A significant proportion of transgender people have been subject to discrimination, harassment and/or hate crime in their own homes. This creates a situation where many transgender people need to live alone in order to feel safe. Whilst affordable and family housing developments are priorities for the plan, sufficient high quality flats, bedsits and small houses need also to be provided in safe social housing.
IF NO

Please give reasons / justifications

If Adjustments are identified please list in Actions Template
**Disability**

Is there an adverse or the potential for an adverse impact?

| IF YES |

Please give reasons / justifications

Please note should the following be taken into account, the LDP would **not** have the potential for an adverse impact. However, the actual impact will need to be monitored throughout the introduction and implementation of the LDP, at annual monitoring reviews and the 4 yearly review stage.

There are issues with the labour market not addressed in the LDP. Neighbourhood Action Plans have been developed by Cardiff Council which should complement the LDP regarding addressing the need for targeted initiatives designed to address socio-economic inequality.

It is crucial to consider accessibility in planning sustainable transport solutions. This includes ensuring clear and accessible information is provided, such as timetables, routes and how to use walking, cycling and public transport routes; visual and audio information on busses and at bus stops; improved provision for wheelchair and priority seating; ramps and accessible design features; and inclusive, comprehensive, cross-impairment disability awareness training for bus, train and station personnel. Active travel training, as mentioned in the Deposit LDP, must also be tailored to the needs of different groups, such as learning disabled people and people with sensory impairments.

The move to encourage and provide for increased walking and cycling, will not negate the need for many disabled people to use public transport or private cars. Some disabled people can only use private cars, whilst others can only use public transport, due to the variety of impairments and their impacts on individuals’ abilities.

It will be critical to ensure that residential areas, employment locations and community facilities include adequate accessible parking and provision for disabled people who need to drive. This is true even for community facilities planned to be close to people’s homes and easily accessible to all residents, as some disabled people cannot get to facilities without driving, even where these are located close to their homes.

It will be essential to ensure that accessible housing is provided not only across the city, but also to provide for various different household sizes. The forthcoming Housing Benefit changes will have a severe negative impact on disabled people, due to the rules regarding benefit deductions for ‘over-occupancy’ i.e. having more bedrooms in your home than the Government deems necessary. Many disabled people will be faced with a benefit cut, as there is insufficient supply of accessible housing to allow them to move to a smaller home which meets their access needs. Therefore there is an urgent need to ensure that accessible homes are available not
only across tenures, but from one-bedroom flats to large family homes.

There should be a requirement for all new housing developments to include a good proportion of housing built to the ‘Homes for Life’ standards. ‘Homes for Life’ standards ensure that a home can be easily adapted for changing circumstances, including families with young children; ageing; disabled people; and worsening health or acquired impairments. The cost of building to ‘Homes for Life’ standards saves money in the long-term, as these design standards negate the need to move home for many disabled people, although not all, and the cost of future home adaptations is far lower than adapting other homes.

It is important to note that this does not negate the need for adaptations to other homes or for accessible housing registers, as ‘Homes for Life’ standards are designed to meet many people’s needs across their life course, therefore providing for an ageing population and higher numbers of disabled people in future, but will not meet all disabled people’s needs.

‘Neighbourhoods for Life’ design standards to provide accessible, inclusive, integrated and sustainable neighbourhoods and should therefore also be adopted in order to ensure that access to green spaces; community facilities; healthcare; sustainable transport and sustainable neighbourhoods can be delivered in a way which accounts for a changing population and needs over a community’s lifetime. KP8 Sustainable Transport Pages 54-57 does not acknowledge car usage as being an essential mode of transport for some disabled people. Therefore accessible parking provision needs to be considered not only in housing developments but also at places of work.

KP13 Responding to evidenced social needs Page 65 iii ‘encourage provision of full range of social, health, leisure and educational facilities…are accessible to all by walking an cycling and public transport’ – this does not recognise the access requirements of some disabled people who need to use a car, need accessible parking and accessible pavements (e.g. dropped kerbs) for use of wheelchairs and mobility buggies

Page 76 - 5.8 “(except those in which residents require a significant element of care)” – why the exclusion?

Page 76 - 5.9 uses the term “affordable special needs housing” – what is meant by “special needs” in this context?

Page 116 4 T1 mentions car free zones – there is no mention of how disabled car users will be able to access these areas.

Page 138, section 6 C1 Community Facilities – it is not clearly stated that these facilities will be accessible to disabled people (e.g. wheelchair users, parking etc…)

Page 149, C9 new educational facilities – should be accessible

Page 76 5.9. ‘.the Council has a duty to have regard to the disabled.’ the disabled should be replace with ‘disabled people’. Furthermore ‘many of whom are best
housed in the community’ – suggest saying ‘the majority of whom are best housed in the community’

The plan does not mention the need for ‘sheltered’ accommodation and residential and nursing homes which is particularly important with regard to acknowledging people generally living longer.

Page 88 ‘provision of complementary facilities for employees..' lists provision of open spaces, public realm, leisure, food and drink and childcare facilities. Although accessible parking spaces for disabled employees and visitors should not be perceived as merely ‘complementary’ (in fact same could be said of the other listed facilities) they should be added.

Page 89 5.66 considering of plans to convert existing properties to hotels or guest houses should include ensuring facilities are accessible to disabled people

Pages 116-117 ‘supporting active travel’ refers to walking and cycling which does not acknowledge the usage by disabled people who can not walk or cycle but who would benefit not least in terms of mental wellbeing.

Page 123 5.224 – in the ‘consider first’ list disabled people should be included (including those who require use of car)

Page 126 5.235 the strategic network should also make provision for access by disabled people. The plan states in brackets that access for all is limited by practicalities. If this is retained there needs to be an explanation of what these practicalities might be.

Pages 127-131 does not mention provision of public accessible toilets, which is often an omission with out of town retail development.

IF NO

Please give reasons / justifications

• Policy H3 relating to affordable housing could have a disproportionate positive impact on disabled people who on average have lower incomes than non-disabled people

If Adjustments are identified please list in Actions Template
### AGE

**Is there an adverse or the potential for an adverse impact?**

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<td>IF YES</td>
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Please give reasons / justifications

Please note should the following be taken into account, the LDP would **not** have the potential for an adverse impact. However, the actual impact will need to be monitored throughout the introduction and implementation of the LDP, at annual monitoring reviews and the 4 yearly review stage.

Young single people and young couples without children are not considered a priority when at risk of losing their home, leading to a situation where a large proportion of homeless people in Cardiff, Wales are young people. Therefore there is an urgent need to address affordability of housing within the private housing sector in order to address youth homelessness outside of the social housing sector. This should be built into planning systems, i.e. not merely adhering to minimum numbers or proportions of affordable, i.e. social, housing within large housing developments, but also a proportion for intermediate housing or provisions for a proportion of housing which would be affordable to young single people or couples, and close to employment opportunities.

It would be easier to comment if I could see some of the projections for population and labour market growth, location of services and measures for measuring impact. For example by the average age is expected to rise from 39.7 in 2010 to 42.2 by 2035 and the number of people aged 90 plus projected to more than triple in that time (2010-based national population projections - principal projection and key variants, ONS, 2011) and similar data

Pages 135-137 Food and Drinks Uses – perhaps in terms of the health of children and young people, takeaways should not be permitted within close proximity to schools and colleges – however, those that provide healthy eating options could be encouraged. Policy C7 Health 5.342 refers to the managing of fast food takeaways in particular where near a school.

Age may be a factor when encouraging engagement in the LDP process, particularly the publication of material on the internet. The use of a range of consultation techniques is therefore important (i.e. postal correspondence and exhibitions in public places). Also for older people living in residential care homes other forms of engagement will need to be considered.

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Please give reasons / justifications
If Adjustments are identified please list in Actions Template

<table>
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<th>Sexual Orientation</th>
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<td>Is there an adverse or the potential for an adverse impact?</td>
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Please note should the following be taken into account, the LDP would **not** have the potential for an adverse impact. However, the actual impact will need to be monitored throughout the introduction and implementation of the LDP, at annual monitoring reviews and the 4 yearly review stage.

There are concerns regarding the size of housing available for LGB people. There is a need to ensure that same-sex couples with children are included within needs for family housing. This will become more prevalent over the coming years due to the changes in the Human Fertilisation and Embryology Act 2010, which allows 2 women to be legal co-parents from the point of conception and rules allowing same-sex couples to have children without the need for adoption, as well as changes to adoption.

There is a need to ensure that all sizes of household are adequately catered for in areas which are considered safe by LGB people and with inclusive, well-trained and welcoming local facilities, such as childcare, schools, employment opportunities, parent and toddler groups, youth groups, health services and community centres. In these settings LGB people and particularly same-sex couples often feel excluded from the community and discriminated against in their own neighbourhoods. This must be addressed as part of creating inclusive, sustainable neighbourhoods.
Emergency accommodation for young LGB people who are either rejected from the family home due to ‘coming out’ or who leave home due to harassment, discrimination and abuse at home due to their sexual orientation, must be addressed. This situation is not uncommon for young LGB people, who require additional support, information, often counselling and social support in order to progress with their lives after facing discrimination and abuse in their own homes. There is an urgent need to ensure that provision of temporary accommodation and supported housing developments are included within the LDP for same-sex domestic violence.

Reasonably well covered if community safety issues and design followed through.

☐ IF NO

Please give reasons / justifications

If Adjustments are identified please list in Actions Template

---

**Welsh Language**

Is there an adverse or the potential for an adverse impact?

☐ IF YES

Please give reasons / justifications

Wonder if it is proactive enough, may suit the present but a fast changing scene.

The Plan fails to provide valuable and specific statistics in relation to Welsh speakers.

☐ IF NO

Please give reasons / justifications

If Adjustments are identified please list in Actions Template

---

**Religion or Belief / Faith Communities**
Is there an adverse or the potential for an adverse impact?

- IF YES

Please give reasons / justifications

Please note should the following be taken into account, the LDP would **not** have the potential for an adverse impact. However, the actual impact will need to be monitored throughout the introduction and implementation of the LDP, at annual monitoring reviews and the 4 yearly review stage.

Response of CCC in their EIA generally covers things but I do wonder whether proposed community facilities will develop in reality. Will we see a more ethical approach within the labour market?

Community safety and hate crime also important considerations for some stigmatised religious groups

- IF NO

Please give reasons / justifications

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**If Adjustments are identified please list in Actions Template**

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**Maternity and Pregnancy**
<table>
<thead>
<tr>
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Please note should the following be taken into account, the LDP would **not** have the potential for an adverse impact. However, the actual impact will need to be monitored throughout the introduction and implementation of the LDP, at annual monitoring reviews and the 4 yearly review stage.

Real issues potentially in transport developments, will new developments like shopping centres respond better, will there be good community facilities in new areas.

Will there be attempts to encourage good employers that provide more support to employees?

□ IF NO

Please give reasons / justifications

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<th>Timescale</th>
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<td>All</td>
<td>Work with Diverse Cymru and other specific groups to help make the engagement and consultation processes accessible and appropriate for all protected characteristics.</td>
<td>Stuart Williams</td>
<td>September 2013</td>
<td>To be determined</td>
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<td>Disability</td>
<td>Take into account accessibility considerations when determining the locations of consultation and engagement events.</td>
<td>Stuart Williams</td>
<td>September 2013</td>
<td>None</td>
<td></td>
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<tr>
<td></td>
<td>Need to amend inaccurate terminology</td>
<td></td>
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</tr>
<tr>
<td>Race or Ethnicity</td>
<td>Seek advice from Diverse Cymru in overcoming Language barriers during key consultation and engagement stages.</td>
<td>Stuart Williams</td>
<td>September 2013</td>
<td>To be determined</td>
<td></td>
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<td>Category</td>
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<td>Date</td>
<td>Notes</td>
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<td>Stuart Williams</td>
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<td>None</td>
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<tr>
<td>Age</td>
<td>Consider an appropriate range and choice of consultation measures. Housing needs for young people and older people – demographic evidence required</td>
<td>Stuart Williams</td>
<td>September 2013</td>
<td>To be determined</td>
<td></td>
</tr>
<tr>
<td>Welsh</td>
<td>Continued compliance with Council’s Welsh Language Scheme with support from the Council’s Welsh Language unit and the Office of the Welsh Language Commission.</td>
<td>Stuart Williams</td>
<td>September 2013</td>
<td>To be determined</td>
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</tr>
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</table>

**Who will approve /authorise?** Cabinet and Full Council

**How will these be monitored?** Through the on-going LDP preparation of the LDP

**How and where will this be published?** The Equalities Impact Assessment will form a Supporting Document to LDP Deposit Plan.
General comments from EAG members

- The Deposit LDP is a good attempt at addressing social and environmental issues. Points previously raised appear to have been incorporated very well. There are loads of good sentiments and considerations.

- It is difficult also to pass as much useful comment as one might because of the absence of the supporting documents that were used to analyse current and future trends.

- The focus on statistical, demographic information only to support needs assessments, with no alternative sources for protected characteristics where there is no such data remains. This is likely to lead to overlooking the needs of certain groups, such as, for example, LGBT people.

- The plan misses an opportunity to ignite a passion in the reader and get across the notion that citizens, their needs and future growth are at the heart of this plan – we need to win the “hearts and minds” of the readers and stakeholders, assuring them that future proposals and plans meet the prevailing and future social, and economic needs and put citizens first.

- The document highlights an impressive array of proposals and considerations but is vague, overly ambitious and wieldy in places. For example “people in Cardiff to achieve their full potential” Page 19 or “ensure people are free from crime” Page 20……

- The language could be made more brief and succinct. For example “to promote social inclusion, equality of opportunity and access for all”; how will this be translated for the citizens we serve? How will the policy, intent make a difference? Page 118 refers to improvements to City’s new bus routes – accessibility, fares, communication strategies and in what languages (the Plan fails to provide valuable and specific statistics in relation to Welsh speakers – Page 16).

- The plan should mention that the Council has a public sector duty to tackle entrenched disadvantage that comes from socio-economic inequality resulting from people’s characteristics.

- As with many docs of this type the devil is in the detail and in particular the absence of info on the following processes that will have such a big impact on the final delivery and shape: Consultation process in Nov – the LDP Delivery Agreement; Edge Analytics; AMR and accompanying measures.
Part 3

Cardiff Council
Responses to comments made by Equality Assessment Group including details on changes made to the final Deposit Plan
Equality Information

DC - There could be more references made to the Council’s Strategic Equality Plan ‘Everyone Matters’ and the ‘What Matters Needs Assessment’.

CC – Accept, this will be amended.

DC - Page 30 4-13 there is no information given on make-up of the Citizens Panel of 1028 people, by protected characteristic.

CC – It is arranged to be a representative sample, information is set out on the Cardiff Citizen’s Panel website.

DC - Page 67, 4.146 The Marmot Review reference is not clear

CC – The review supports Healthy Urban Planning and Design. Quotation marks added to make this clear.

Engagement

DC - How will the Council make it accessible to people in order to carry out a meaningful consultation? How can they communicate this plan to people in a way in which generally people can understand what they are planning and comment on it?

CC – Events will be run at accessible locations within local communities across the City. The events will be at a variety of times throughout the day to suit different circumstances. People can comment on the plan in a range of ways. Where appropriate, Cardiff Council will seek the assistance of Diverse Cymru to contact hard to reach groups to better understand their needs.

DC - Are there any plans to produce the document in other formats to give a wider audience the opportunity to respond. Options to include EasyRead, Large print but also consideration may need to be given to other language versions.

CC – If required, consultation documents can be provided in alternative formats and languages.

Monitoring

DC - Page 163, 6.2 Will the Annual Monitoring Report (AMR) be required to comment on equality impacts? Or at the four year review stage?
CC – Information regarding equalities will be included within the contextual indicators in the Annual Monitoring Report.

**Economy/Jobs**

DC - The plan estimates the arrival of some 40,000 new jobs. There is a current imbalance in jobs meaning some population groups face greater challenges. Will the new jobs address this imbalance or merely reinforce it. What role might the LDP have in shaping the labour market, if any? Is it intended to be a reactive response to whatever growth happens?

CC – The LDP caters for a range and choice of different employment types, however any influence over shaping the labour market is outside the remit of the LDP, which is a land use policy strategy.

DC - How much would new employers be asked to cater for needs in build to cater for protected characteristics and a balanced recruitment?

CC – The LDP is a land use policy strategy and does not have any influence over recruitment.

**Transport**

DC - The impact on disabled people, older people and those with caring roles has the potential to be quite negative. The Plan touches on the need to consider people with different access needs, however there is a strong drive to promote cycling as the second preferred mode of transport “favourable consideration to cyclists” Page 123 will also need to ensure that this does not disadvantage blue badge holders

CC – Noted. Detailed design will into account the needs of all users.

**Community Facilities**

DC - Should there be a business case requirement for examining the real economic feasibility of communal facilities before plans are agreed?

CC – Issues of economic feasibility for community facilities would be looked into during the detailed planning permission stage.

**Housing**

DC - Could a definition of ‘affordable’ housing be included in the plan?

CC – A definition is included within Technical Advice Note 2 on Housing. Also, see para 5.9 of LDP.
DC - Page 75 - H3 – Affordable Housing. What is meant by “where there is evidence of need”? Figures are not yet in plan.

CC – Level of need is set out in Housing Needs study and the combined housing waiting list. Final figure to be included in the LDP.

DC - ‘BME communities sometimes require larger house types to accommodate large/extended families and this policy will enable the provision of such accommodation’. ‘Extended’ should be added to statement in Councils’ draft EIA.

CC – Accept.

Safety

DC - There is a need to recognise the different needs of each protected characteristic group in relation to feeling safe and being protected from violence and hate crime in the detailed SPG to follow the Deposit LDP.

CC – Noted.

Terminology

DC

Page 24, 2(b) replace ‘… the elderly, the disabled …’ with ‘… older people, disabled people …’

Page 55 iv replace ‘… special …’ with ‘… particular …’

Page 65 - 4.136 uses the term “special needs” replace with disabled people

Page 70, 4.154 replace ‘… the very young, the old, and mobility-impaired persons…’ with ‘… young people (and/or children – not clear to which group ‘the very young’ refers), older people and people with mobility impairments …’

Page 76 5.9. ‘..the Council has a duty to have regard to the disabled..’ the disabled should be replace with ‘disabled people’. Furthermore ‘many of whom are best housed in the community’ – suggest saying ‘the majority of whom are best housed in the community’

Page 85, 5.48 It perhaps goes without saying that these spaces will be accessible, or should this be made explicit?

Page 117, 5.204 Car free-zones could exclude disabled people who need to use their car.

Page 120: T3 2 replace ‘… people with special access needs …’ with ‘… disabled people with particular access needs …’
Page 122: T5 (ii) replace ‘...people with special access and mobility requirements ...' with ‘...disabled people with mobility impairments and particular access needs ...'

Page 122 ii remove ‘special’; remove ‘special’ from 5.221 iii and 5.222 first bullet point and replace ‘people with disabilities’ with ‘disabled people’.

Page 122: T5 add (xi) people with prams and/or young children

Page 122: 5.221 (iii) replace ‘...people with special access and mobility requirements ...’ with ‘...disabled people with mobility impairments and particular access needs ...’

Page 122: 5.222 Split first bullet point as above as it is important to keep in mind the needs of both groups of people

Policy T5 Managing Transport Impacts (Page 122) supports the provision of transport infrastructure in new development that provides for the needs of people with access and mobility requirements including disabled people and people with young children. Remove ‘special’ and ‘with disabilities’ used in statement in Council’s draft EIA.

CC – All above terminology changes accepted.

Page 148 C8 and page 149 C9 – perhaps it goes without saying that these educational facilities will be accessible to disabled pupils and disabled students?

CC – Yes, no change.

General point – the interchanges need to be accessible to disabled travellers and people with prams/young children

CC – Yes, no change.

Race or Ethnicity

DC - The LDP needs to provide information regarding how BME socio-economic deprivation issues will be addressed.

CC – Noted. KP13 aims to tackle deprivation and improve the quality of life for all.

DC - It is not clear from the document whether the Gypsy & Traveller communities have been consulted in respect of proposal for new sites and whether these meet their needs.

CC – The Gypsy and Traveller community have been involved and informed throughout the needs studies and will continue to be involved in any future decisions.

Sex

DC - Consideration of labour market issues such as affordable childcare, adequate child care facilities, flexible working practices need to be considered to attract in particular lone parents (9 out of 10 being women) and carers.
CC – These issues are beyond the scope of the LDP

DC - There is an urgent need to ensure that provision of temporary accommodation and supported housing developments are included within the LDP for women fleeing from domestic violence.

CC – The LDP provides for a range of dwelling sizes, types and affordability including meeting special needs.

DC - The following should amendments should be made to the Council’s draft EIA:

Increasing the accessibility of the built environment, public transport and housing and improving access to services will benefit both men and women but will be particularly beneficial to people with caring responsibilities, who are predominantly women. ‘who are predominately women’ should be added to statement in Council’s draft EIA.

Policy KP8 Sustainable Transport (Page 54) aims to maximise sustainable travel modes, including public transport, provide for people with people with prams / young children who are predominantly women) and improve safety for all travellers. ‘who are predominately women’ should be added to statement in Council’s draft EIA

CC – Accept.

Gender Reassignment

DC – There is no reference within the document to transgender people.

CC – The LDP sets a land use framework for all sectors of society.

Disability

DC - There are issues with the labour market not addressed in the LDP. Neighbourhood Action Plans have been developed by Cardiff Council which should complement the LDP regarding addressing the need for targeted initiatives designed to address socio-economic inequality.

CC – Issues regarding the labour market are not within the remit of the LDP which is a strategic land use policy document.

DC - It is crucial to consider accessibility in planning sustainable transport solutions. This includes ensuring clear and accessible information is provided, such as timetables, routes and how to use walking, cycling and public transport routes; visual and audio information on buses and at bus stops; improved provision for wheelchair and priority seating; ramps and accessible design features; and inclusive, comprehensive, cross-impairment disability awareness training for bus, train and station personnel. Active travel training, as mentioned in the Deposit LDP, must also be tailored to the needs of different groups, such as learning disabled people and people with sensory impairments.
CC – Noted. Many of these issues are detailed design issues which will be picked up in Supplementary Planning Guidance.

DC - The move to encourage and provide for increased walking and cycling, will not negate the need for many disabled people to use public transport or private cars. Some disabled people can only use private cars, whilst others can only use public transport, due to the variety of impairments and their impacts on individuals’ abilities.

CC – Noted. Detailed design will take account of the needs of all users.

DC - There is an urgent need to ensure that accessible homes are available not only across tenures, but from one-bedroom flats to large family homes.

CC – A range and choice of housing will be provided within the plan period.

DC - There should be a requirement for all new housing developments to include a good proportion of housing built to the ‘Homes for Life’ standards. ‘Homes for Life’ standards ensure that a home can be easily adapted for changing circumstances, including families with young children; ageing; disabled people; and worsening health or acquired impairments.

CC – Policy KP5 (viii) Good Quality and Sustainable Design states that new development should achieve an adaptable design that can respond to future social, economic, technological and environmental requirements.

DC - KP8 Sustainable Transport Pages 54-57 does not acknowledge car usage as being an essential mode of transport for some disabled people. Therefore accessible parking provision needs to be considered not only in housing developments but also at places of work.

CC – Noted. Detailed information will be included in a parking standards SPG.

DC - KP13 Responding to evidenced social needs Page 65 iii ‘encourage provision of full range of social, health, leisure and educational facilities...are accessible to all by walking an cycling and public transport’ – this does not recognise the access requirements of some disabled people who need to use a car, need accessible parking and accessible pavements (e.g. dropped kerbs) for use of wheelchairs and mobility buggies

CC – The policy applies to all and aims to ensure that community facilities are in accessible and sustainable locations. Detailed design will consider the needs of all users.

DC - Page 76 - 5.8 “(except those in which residents require a significant element of care)” – why the exclusion?

CC – Those with a significant element of care i.e. care homes and hospitals are not regarded in planning use classes as a residential dwelling, so they fall outside the definition.

DC - Page 76 - 5.9 uses the term “affordable special needs housing” – what is meant by “special needs” in this context?

CC – Those who required specially adapted affordable homes to cater for individual needs.
DC - Page 116 4 T1 mentions car free zones – there is no mention of how disabled car users will be able to access these areas.

CC – There could be special arrangements made to allow for this, it is something for a more detailed stage of planning.

DC - Page 138, section 6 C1 Community Facilities – it is not clearly stated that these facilities will be accessible to disabled people (e.g. wheelchair users, parking etc…)

CC – This is a detailed parking issue which would be looked at during a planning application stage to ensure sufficient parking was provided for disabled people. The policy applies to community facilities for the local community, which would include disabled people who require a parking space.

DC - Page 149, C9 new educational facilities – should be accessible

CC – Noted.

DC - Page 76 5.9. ‘..the Council has a duty to have regard to the disabled..' the disabled should be replace with ‘disabled people’. Furthermore ‘many of whom are best housed in the community’ – suggest saying ‘the majority of whom are best housed in the community’

CC – Accept.

DC - The plan does not mention the need for ‘sheltered’ accommodation and residential and nursing homes which is particularly important with regard to acknowledging people generally living longer.

CC – The LDP has a duty to provide for residential dwellings, these uses fall outside this definition and are covered under other strategies for Cardiff. Policy KP13, reasoned justification now refers to supported and sheltered housing.

DC - Page 88 ‘provision of complementary facilities for employees..' lists provision of open spaces, public realm, leisure, food and drink and childcare facilities. Although accessible parking spaces for disabled employees and visitors should not perceived as merely ‘complementary’ (in fact same could be said of the other listed facilities) they should be added.

CC – Noted. Building Regs/DDA would be provided at the detailed design stage.

DC - Page 89 5.66 considering of plans to convert existing properties to hotels or guest houses should include ensuring facilities are accessible to disabled people

CC – Any converted buildings would have to be DDA compliant and will be set out in building regulations.

DC - Pages 116-117 ‘supporting active travel’ refers to walking and cycling which does not acknowledge the usage by disabled people who can not walk or cycle but who would benefit not least in terms of mental wellbeing.

CC – Noted.
DC - Page 123 5.224 – in the ‘consider first’ list disabled people should be included (including those who require use of car)

CC – The intention is that all users are included in the table.

DC - Page 126 5.235 the strategic network should also make provision for access by disabled people. The plan states in brackets that access for all is limited by practicalities. If this is retained there needs to be an explanation of what these practicalities might be.

CC – As stated, access for all will be provided where possible, but in certain circumstances it may not be possible, it is not appropriate to list all possible circumstances here however.

DC - Pages 127-131 does not mention provision of public accessible toilets, which is often an omission with out of town retail development

CC – This is a more detailed design issue and would be covered under building regulations.

**Age**

DC - Pages 135-137 Food and Drinks Uses – perhaps in terms of the health of children and young people, takeaways should not be permitted within close proximity to schools and colleges – however, those that provide healthy eating options could be encouraged. Policy C7 Health 5.342 refers to the managing of fast food takeaways in particular where near a school.

CC – Further guidance on this will be set out in an SPG.

DC - Age may be a factor when encouraging engagement in the LDP process, particularly the publication of material on the internet. The use of a range of consultation techniques is therefore important (i.e. postal correspondence and exhibitions in public places). Also for older people living in residential care homes other forms of engagement will need to be considered.

CC – A variety of consultation methods will be used to try and involve as many different groups in society as possible. Where appropriate, Cardiff Council will seek advice and assistance from Diverse Cymru in contacting harder to reach groups.

**Sexual Orientation**

DC - There are concerns regarding the size of housing available for LGB people. There is a need to ensure that same-sex couples with children are included within needs for family housing.

CC – A range and choice of housing is planned for to cater for a variety of family sizes.

DC - There is a need to ensure that all sizes of household are adequately catered for in areas which are considered safe by LGB people and with inclusive, well-trained and
welcoming local facilities, such as childcare, schools, employment opportunities, parent and toddler groups, youth groups, health services and community centres.

CC – Note, however, some of these issues are beyond the remit of the LDP.

DC - There is an urgent need to ensure that provision of temporary accommodation and supported housing developments are included within the LDP for same-sex domestic violence.

CC – A range and choice of accommodation types is planned for in the LDP, however these may issues more relevant for the local housing service.

**Welsh Language**

DC - Wonder if it is proactive enough, may suit the present but a fast changing scene. The Plan fails to provide valuable and specific statistics in relation to Welsh speakers.

CC – A separate appendix to the LDP covers key issues which includes statistics on the number of Welsh speakers in Cardiff.

**Religion or Belief/Faith Communities**

DC - Response of CCC in their EIA generally covers things but I do wonder whether proposed community facilities will develop in reality. Will we see a more ethical approach within the labour market? Community safety and hate crime also important considerations for some stigmatised religious groups

CC – Noted.

**Maternity and Pregnancy**

DC - Real issues potentially in transport developments, will new developments like shopping centres respond better, will there be good community facilities in new areas.

CC – The transport network aims to provide access for all to community facilities and shopping centres.

DC - Will there be attempts to encourage good employers that provide more support to employees?

CC – This is beyond the scope of the LDP.
### Actions/Tasks Identified through the Assessment/Reassessment

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<td>Work with Cardiff Council’s Citizens Focused Team &amp; Diverse Cymru and other specific groups to help make the engagement and consultation processes accessible and appropriate for all protected characteristics.</td>
<td>Stuart Williams</td>
<td>September 2013</td>
<td>To be determined</td>
<td>Agree.</td>
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<td>The LDP caters for all needs.</td>
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Need to amend inaccurate | Stuart Williams | September 2013 | None             | Agree.   |
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<tr>
<th><strong>Race or Ethnicity</strong></th>
<th><strong>Need to recognise need for car usage as essential means of transport</strong></th>
<th><strong>Refer more to Everyone Matters SEP and Integrated Partnership Board with regard to collaboration to address socio-economic inequalities</strong></th>
<th><strong>Stuart Williams</strong></th>
<th><strong>September 2013</strong></th>
<th><strong>To be determined</strong></th>
<th><strong>Agree. Ref to strategy added in paragraph 3.1 of Plan</strong></th>
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<td><strong>Religion</strong></td>
<td><strong>Take into account specific requirements when considering the timings and location of consultation and engagement events.</strong></td>
<td></td>
<td><strong>Stuart Williams +</strong></td>
<td><strong>September 2013</strong></td>
<td><strong>None</strong></td>
<td><strong>Agree</strong></td>
</tr>
<tr>
<td><strong>Age</strong></td>
<td><strong>Consider an appropriate range and choice of consultation measures. Housing needs for young people</strong></td>
<td></td>
<td><strong>Stuart Williams</strong></td>
<td><strong>September 2013</strong></td>
<td><strong>To be determined</strong></td>
<td><strong>Agree</strong></td>
</tr>
<tr>
<td>Welsh</td>
<td>Continued compliance with Council’s Welsh Language Scheme with support from the Council’s Welsh Language unit and the Office of the Welsh Language Commission.</td>
<td>Stuart Williams</td>
<td>September 2013</td>
<td>To be determined</td>
<td>Agree</td>
<td></td>
</tr>
</tbody>
</table>

**Who will approve /authorise?** Cabinet and Full Council

**How will these be monitored?** Through the on-going LDP preparation of the LDP

**How and where will this be published?** The Equalities Impact Assessment will form a Supporting Document to LDP Deposit Plan.