

Core Strategy Submission Draft Initial Impact Assessment Report Race Relations Act

Purpose of Assessment

- 1.0 The purpose of the assessment is to see if the policies and provisions of the Council's submission draft Core Strategy discriminate against particular persons/groups. To do this consideration must be given to the provisions of the Race Relations Act 1976 and the Race Relations (Amendment) Act 2000.

Race Relations Act

- 2.0 The Race Relations Act 1976 makes it unlawful to discriminate against persons or groups either directly or indirectly on grounds of their race. The general duty is set out in Section 71(1) of the Act. This duty is to eliminate unlawful racial discrimination, promote equality of opportunity and to promote good race relations.
- 2.01 The Act defined direct discrimination as
Treating a person on racial grounds, less favourably than others are, or would be, treated in the same or similar circumstances. Segregation of a person on racial grounds is to be regarded as treating him or her less favourably
- 2.02 The Act defined indirect discrimination as
When a person applies a requirement or condition, which is such that the proportion of persons from the same racial group who can comply is considerably smaller than persons who are not of that racial group; and it cannot be shown that the condition is justified irrespective of the racial origins of the person concerned; and it is to that person's detriment that he/she cannot comply.
- 2.03 The act applies to public authorities and their employees and specifically to matters relating to employment, education, housing and service provision.

The Race Relations (Amendment) Act 2000

- 3.0 This was introduced to ensure that those public authorities and functions not previously subject to the 1976 Act are now subject to it. E.g. the Police
- 3.01 There is a duty to produce a Race Equality Scheme, which sets out arrangements for ensuring that any new or proposed policy is screened for race equality. Where the policy is deemed to be relevant to race equality, the authority should carry out a Race Equality Impact Assessment (REIA) and appropriate consultation. This is a simple, sound and effective tool for ensuring new and proposed policies proactively address the different strands of the duty. They enable the

removal of aspects of the policy, which may be considered to be discrimination, prior to the introduction of the policy.

- 3.02 The assessment is a two stage process. Stage 1 involves screening a proposed policy to see if it is relevant to the race equality duty. Stage 2 is a full assessment, including consultation and is only required if the policy is relevant to the race equality duty.

Wokingham Core Strategy

- 4.0 The Core Strategy is a Development Plan Document that will form part of the District's Local Development Framework. The documents that comprise the framework will replace the Council's Local Development Plan.

- 4.01 The Core Strategy sets out the district's long term vision and the strategy to be applied in promoting and controlling development throughout its area. It identifies the approach for the distribution of development and high level policies to guide implementation.

- 4.02 The vision in the Core Strategy involves:

- i) Protecting the character of the district;
- ii) Limiting development in those areas at most risk of flooding and pollution;
- iii) Protecting the most important areas for biodiversity, landscape and heritage from development;
- iv) Seeking to improve the infrastructure, including roads, schools, healthcare and open space provision through new development taking account of the health and well being of residents;
- v) Ensuring design in keeping with the area;
- vi) Keeping the towns and villages separate and
- vii) Achieving sustainable development.

- 4.03 New development is proposed to be provided in Strategic Development Locations and through modest or limited growth elsewhere. Public consultation has supported this approach as the one most likely to provide adequate infrastructure to meet the needs of the existing and new communities.

The Assessment

- 5.0 This is a stage 1 screening assessment of the policies in the core strategy. Each of the policies in the Core Strategy is summarized below. Following the summary there is a commentary based on the following checklist:

- What is the purpose of the policy and why?
- Who is intended to benefit and how?
- What consultation, statistical or qualitative information is available to aid assessment?

- To what extent will the proposed policy or provision achieve equal opportunities and good relations between different racial groups or impact upon them
- Is there a risk associated with the proposed policy or provision that the race equality duty will not be met if it has an impact on particular persons or groups

5.01 The Core Strategy contains 22 policies on the following topics:

- a) Broad strategy for development locations within the district, including the extent of each settlement and the scale of acceptable schemes. This strategy will be based on applying the approach in point b.
- b) Emphasis on the need to achieve sustainable development through an application of a sequential approach involving:
 - i) *Avoiding areas at risk of flooding*
 - ii) *Protecting important wildlife sites*
 - iii) *Protecting important and sensitive landscapes*
 - iv) *Protecting the district's heritage (including archaeology)*
 - v) *Safeguarding high quality soil*
 - vi) *Avoiding groundwater protection areas*
 - vii) *Safeguarding recreational opportunities & green spaces*
 - viii) *Encouraging development on sites occupied with buildings or structures (including where recently cleared)*
 - ix) *Encouraging efficient use of land, buildings and resources (including re-use)*
 - x) *Resolving or avoiding areas that suffer from contamination or pollution (including noise)*
 - xi) *Accessing non-car transport modes*
- c) Establish locations of Core Employment Areas
- d) Identify a hierarchy of retail centres
- e) Ensuring that appropriate improvements to facilities and infrastructure arise through development
- f) Ensure that high standards of design, materials, accessibility (both the layout of the overall proposal together with the ease that it is possible to enter each building), safety, energy efficiency, landscaping and layout are achieved in all schemes
- g) Outline the broad approach with respect to development within specific sub-areas of the district, such as the Green Belt.
- h) Identification of the strategic & local transport networks and locations where improvements are proposed (in line with the LTP)
- i) Reducing the need to travel (including vehicular parking standards and traffic management). This would also include provision of new facilities in areas thereby improving overall sustainability.
- j) Setting the overall housing requirements during the period covered by the Core Strategy
- k) Apply a hierarchy of protection to designated wildlife sites (Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Wildlife Heritage Sites (WHS))
- l) Protect important species
- m) Setting the principles regarding the provision of affordable housing
- n) Outlining the approach to monitoring and implementation

It will also contain the vision for how the District will be in 2026 through the implementation of the core strategy.

Core Strategy Policy CP1 Sustainable Development

The purpose of this policy is to ensure that development is sustainably located and maintains or enhances the quality of the environment as set out in b) above

Commentary:

Although this policy will bring with it financial costs for those undertaking development, it is considered this will not have a disproportionate effect on different sections of the community. Consequently it will not discriminate against particular persons and groups

Core Strategy Policy CP2 Inclusive Communities

The purpose of this policy is to ensure development is provided to meet diverse needs, including Gypsies and Travellers, who may have previously been at risk of homelessness.

Commentary:

The policy will prevent direct and indirect discrimination by ensuring the requirements of all are considered when development is proposed.

Core Strategy Policy CP3 General Principles for development

The purpose of this policy is to ensure that new development is appropriately integrated into its surroundings, contributes to the character of the area and does not result in a loss of residential accommodation.

Commentary:

Provided sites for housing are delivered across the District to meet identified housing need there will not be a net loss in housing provision overall across the District and general community needs will be met. Maintaining the character of individual areas may in some instances restrict the provision of some types of new housing in parts of the District. This should not in itself lead to disadvantage for particular groups or indirect discrimination by the segregation of groups within the community provided a range of housing types are provided overall. Retaining character may lead to the provision of large family houses in some areas and would benefit groups living as an extended family.

Core Strategy Policy CP4 Infrastructure Requirements

The purpose of this policy is to ensure that a mechanism is in place to provide appropriate and necessary mitigation measures and improvements to infrastructure when new development takes place.

Commentary:

This requirement may add to the cost of development, which developers may pass on to purchasers but will not discriminate on racial grounds against particular persons or groups. It provides a mechanism to secure types of development not provided by the market.

Core Strategy Policy CP5 Housing Mix Density and Affordability

The purpose of this policy is to meet the housing needs of as many households as possible both within built areas and by exception outside designated development limits.

Commentary:

Policy CP5 does this through a requirement for a mix of housing size, density, tenure and type. It provides for the provision of affordable housing.

The more ways in which housing can be provided, including for those not able to compete in the market, the less the risk that the Planning Authority will be acting in a discriminatory way.

When need has to be demonstrated for a particular type of housing, provided the eligibility criteria are widely drawn, the provisions of this policy are unlikely to be indirectly discriminatory. If the amount of housing to which restrictions apply is not disproportionately large there will be less risk of indirect discrimination.

The mix of houses should include some larger dwellings as well as small units.

Core Strategy Policy CP6 Managing Travel Demand

The purpose of this policy is to ensure that existing and proposed development is accessible for all by a choice of means in order to reduce pressure on the transport system.

Commentary:

This proposal seeks to accommodate the needs of the whole community and improve choice and will not discriminate against particular persons or groups.

Core Strategy Policy CP7 Biodiversity

The purpose of this policy is to protect and enhance the diversity of wildlife.

Commentary:

This policy will not discriminate against particular groups

Core Strategy Policy CP8 Thames Basin Heaths Special Protection Area

The purpose of this policy is to limit cumulative impact on a sensitive environment protected under the Habitats Directive because of predation by animals and disturbance by people as a result of additional development close to the Special Protection Area (SPA).

Commentary:

Unless mitigation can be provided, the policy restricts development in the parts of the district close to the SPA. This affects all parts of the community that propose new development within the area affected. A relatively high proportion of the Gypsy and Traveller community would be affected.

Core Strategy Policy CP9 Scale and Location of Development proposals

The purpose of this policy is to ensure that the scale new of development within existing built areas relates to the levels of facilities and services already available or proposed.

Commentary:

This policy will not discriminate against particular groups.

Core Policy CP10 - Improvements to the Strategic Transport Network

The policy indicates new roads to be constructed and major improvements to public transport provision during the plan period. It seeks to ensure new land uses and developments will be accessible.

Commentary:

Although there will be impacts from the provision roads and public transport this policy will not discriminate against particular persons/groups.

Core Strategy Policy CP11 Proposals outside Development Limits

The purpose of this policy is to prevent proliferation of development in the countryside but allows some exceptions where buildings are reused and environmental improvement achieved.

Commentary:

This policy affects all parts of the community that propose new development in the countryside. Housing and other allocations in the countryside on the edge of the built area that are brought forward through the LDF would be included within development limits. National Policy in Circular 1/2006 allows for substantiated Gypsy and Traveller needs to be considered as an exception to the restrictions on development in the countryside but encourages the identification of sites specifically for their needs through the LDF process in preference. This will be a matter for the Development Management and Allocations DPD taking account of a Housing Market Assessment and housing needs assessments rather than relying on policies in the Core Strategy.

Core Strategy Policy CP12 Green Belt

This policy prevents inappropriate development in the area of the District that is designated as Green Belt. This is in line with National provisions in PPG2.

Commentary:

Preservation of the Green Belt boundaries will restrict development for new housing or employment the policy including new sites for Gypsies and Travellers. National Policy does not make general exceptions to Green Belt restrictions for this group. There is already a presence of Gypsies and Travellers in the Green Belt. There would be potential for indirect discrimination if this group have more need for accommodation more than other groups. The identification of sites elsewhere in built -up areas or rural areas of the district outside the Green Belt may mitigate for the restriction of new sites in the Green Belt. Locational need in most circumstances will not be so specific that disadvantage will occur. If very special circumstances are substantiated on a site already in the Green Belt development may take place.

Core Strategy CP13 Gaps

The purpose of this policy is to prevent the coalescence of towns and villages as a result of development.

Commentary:

The maintenance of physical and visual gaps between towns and villages will restrict development, however as these designations are less permanent than the Green Belt overriding needs for development, including for particular groups will be considered in the drawing up of the boundaries in the Development Management and Allocations DPD.

Core strategy Policy CP14 - Town centres and shopping

The purpose of this policy is to protect and maintain shopping in existing locations across the district, to provide for the growth of Wokingham town centre and to allow for the designation of new centres through the Local Development Framework.

Commentary:

Although one commercial area of the district is proposed for a higher rate of growth than other areas it is not considered that this will have a disproportionate effect. This is because the growth is to meet the increased need for services and facilities arising from new development proposed for the town and because Policy CP14 protects other shopping areas from harm. Consequently the policy will not discriminate against particular persons/groups.

Core Strategy Policy CP15 - Growth of and Renaissance of Wokingham Town Centre

The purpose of this policy is to identify the different elements that would be appropriate in Wokingham Town Centre.

Commentary:

This policy does not have a disproportionate effect and will not discriminate against particular groups.

Core Strategy CP16 - Employment Development

Policy CP18 seeks to protect existing employment sites for employment use. It also seeks proportionate mitigation is provided where there is impact on the demand for housing, labour, skills traffic and highways.

Commentary:

This policy seeks to ensure a continuing supply of jobs close to where people live. It will not discriminate against particular persons/groups.

Core Policy CP17 - Science Park

The purpose of this policy is to allocate additional land for a specific type of employment use to complement existing provision.

Commentary:

This policy will not discriminate against particular groups

Core Strategy Policy CP18 - Housing Delivery

The purpose of this policy is to identify how the Council intends to meet its housing requirements. It identifies the assumptions it has made.

Commentary:

This policy will not discriminate against particular groups.

Core Strategy Policy CP19 – Arborfield Garrison Strategic Development Location

The purpose of this policy is to identify how the Strategic Development Location will be developed in a well-designed and sustainable way.

Commentary:

This policy will not discriminate against particular groups.

Core Strategy Policy CP20 – South of the M4 Strategic Development Location

The purpose of this policy is to identify how the Strategic Development Location will be developed in a well-designed and sustainable way.

Commentary:

This policy will not discriminate against particular groups.

Core Strategy Policy CP21 - North Wokingham Strategic Development Location

The purpose of this policy is to identify how the Strategic Development Location will be developed in a well-designed and sustainable way.

Commentary:

This policy will not discriminate against particular groups.

Core Strategy Policy CP22 - South Wokingham Strategic Development Location

The purpose of this policy is to identify how the Strategic Development Location will be developed in a well-designed and sustainable way.

Commentary:

This policy will not discriminate against particular groups.

Appendix 1 Supporting Information

Table 1 shows the ethnic background of household members living in social rented accommodation compared with all household in the district. It is taken from the Wokingham Housing Requirements Study 2002. A slightly higher than average proportion of social renting households were of white ethnic background compared to all household members in the survey.

Table 1 Ethnic Origin of Household members by all Households

Ethnic Origin	Household members	
	All Social renting HH %	All HH %
White British	95	92
White Irish	1	1
Any other white background	1	3
Mixed White and Black Caribbean	0	*
Mixed White and Black African	0	*
Mixed White and Asian	2	*
Any other mixed background	1	*
Asian or Asian British - Indian	0	1
Asian or Asian British - Pakistani	0	*
Asian or Asian British - Bangladeshi	0	*
Any other Asian background	0	*
Black or Black British - Caribbean	1	*
Black or Black British - African	0	*
Chinese	0	*
Any other ethnic background	0	1
* not available		

Table 2: Household Composition by Ethnic group

	All	White	Mixed	Asian/ Asian British	Black/ Black British	Chinese	Other
All Households	57,298	54,759	290	1360	501	206	182
One person %	23	23	20	10	20	14	11
Lone Parent %	6	6	11	7	11	8	3

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Table 3: Tenure by Ethnicity

Population as a whole

	All	Number	Percentage
Own	Own Outright	36,093	24
	Mortgage or loan	87,434	58
	Shared ownership	854	0.6
Rent	Council	6,914	5
	Other Social Rents	2,631	1.8
	Private	10,403	7
Rent Free		1493	
Communal establishment		4,406	

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Ownership

People who are white are more likely to own their home outright -. 25%
 People who are Asian or Asian British are more likely to have a mortgage or loan - 65%. People who identified themselves as from 'other ethnic minority' are least likely to have a mortgage -32%
 Black or Black British people are more likely than the population as a whole to have shared ownership. 1.3%.

Renting

The following groups are less likely to rent from the Council than the population as a whole:

- Asian/Asian British 1.2%
- Other 0.5%
- Chinese 0.4%

Social renting is highest (4%) in Mixed race and Black/Black British groups in the population as a whole it is 1.8%. 46% of mixed race people have a mortgage.

Private renting is highest in the following groups:

- Other 40%
- Black/Black British 18%
- Chinese 12%

Table 4: Average household Size

Local Authority	Average Household Size	Number of Rooms per household
Wokingham	2.55	6.17
Bracknell	2.46	5.61
Reading	2.4	5.17
Slough	2.63	4.78
West Berks	2.46	5.86

Windsor & Maidenhead	2.39	5.84
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Source: 2001 Census, Crown copyright 2004. Crown copyright material is reproduced with the permission of the Controller of HMSO

Table 5: Average Household Size for Selected Ethnic Groups in South East Region

All Households	British	Mixed Race	Indian	Pakistani	Bangladeshi	Black Caribbean	Black African	Chinese	Other
2.38	2.35	2.52	3.18	4.18	4.17	2.46	2.62	2.7	2.71

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In addition there is information from a Gypsy and Traveller Accommodation Needs Assessment for the Thames Valley Region undertaken in 2006. This suggests that the average household size of those interviewed in Berks, Bucks and Oxon is greater than that for the general population. Across the Thames Valley Region it varied from 2.4 to 5.0. In Wokingham District the average household size of the survey population was 4.08.

Table 6a: Key Statistics on standard of accommodation

Local authority	Number of Overcrowded Households	% of total number of households
Wokingham	1,967	3.4
Bracknell	2,575	5.9
Reading	6,349	11
Slough	7,361	16.4
West Berks	2,684	4.7
Windsor & Maidenhead	2,757	5.2

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Table 6b: Census 2001 Key Statistics on standard of accommodation

Local Authority	Without central heating and sole use of bath/shower and toilet	Without central heating	With central heating but without sole use of bath/shower and toilet
Wokingham	17	1,323	70
	0.03%	2.31%	0.12%

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Indices of Multiple Deprivation 2004

Five super output areas are outside the best 50% nationally. The super output areas which are most deprived in Wokingham District for service availability and housing are in rural areas. Remenham, Riseley, Honey Hill Spencers Wood and Hurst East are in the worst 20% in the UK.

The area with the poorest living environment is Wokingham Town Centre. This super output area is in the worst 30% nationally. The domain for living environment includes indoor living conditions and the outdoor living conditions of air quality and road traffic accidents.