

Addressing Inequalities

Minerals Plan – refreshed February 2010

Surrey County Council Equality Impact Assessment Template

Stage one – initial screening

(Please refer to pages one to twelve of the guidance before completing this screening)

What is being assessed?	The Surrey Minerals Plan.
Service	Environment
Name of assessor/s	Les Andrews
Head of service	Roger Hargreaves
Date	December 2009
Is this a new or existing function or policy?	New

Write a brief description of your service, policy or function. If this screening is part of a project it is important to focus on the service or policy the project aims to review or improve.

The Surrey Minerals Plan*

The county council as Mineral Planning Authority has a statutory duty to prepare a minerals plan. This is to ensure that Surrey can meet its requirements for minerals in the most sustainable way, and to set the framework and policies to determine future planning applications for mineral development up to 2026. The Plan operates at the strategic level in making overall provision across the county and at the local level by identifying sites that are considered suitable for mineral extraction and processing. The Plan will set out detailed policies against which planning applications for mineral development from the private sector will be determined.

The intention of the county council in preparing and completing the Surrey Minerals Plan (the Plan) is to discharge its legal responsibilities as MPA and to carry out this responsibility by having full regard to the interests of its residents and the environment. In preparing the Plan the county council have the goal of consulting in as much detail and with as wide a range of people and representative organisations as is reasonably possible. This is to ensure

that their views on the contents of the Plan are known and can be taken into account in its preparation.

The Plan forms a part of the Surrey Minerals and Waste Development Framework. It has been prepared by the minerals and waste planning policy team. The Plan is concerned solely with the provision of minerals. The Waste Plan is similarly concerned solely with the management and disposal of waste (a separate Equality Impact Assessment of the Waste Plan has already been carried out and can be seen on the relevant pages of the county council's web site).

The Plan sets the policy framework against which all planning applications for the working of mineral sites will be determined by the Planning and Regulatory Committee.

It should be noted that whilst there is public access to some waste facilities such as a community recycling centre, there is no such access to any mineral working.

There are no equality and diversity issues that arise from the policies in the Plan.

It is the function of the minerals and waste development control team (DC) to consider and make recommendations to the Planning and Regulatory Committee when they determine planning applications in the light of the Plan (a separate Equality Impact Assessment has already been carried out of the DC function which can also be seen on the relevant pages of the county council's web site).

DC require design and access statements from applicants when considering planning applications. This statement shows that the person applying for permission (the applicant) has thought carefully about how everyone, including disabled people, older people and very young children will be able to use the places they want to build where relevant. DC also, as part of their considerations, assess whether planning applications raise equality and diversity issues and how they should be managed.

* see: <http://www.surreycc.gov.uk/mineralsplan>

Indicate for each equality strand whether there may be a positive impact, negative impact, or no impact.

Equality Strand	Positive	Negative	No impact	Reason
Age		√		The consultation has the potential not to reach people in this strand unless appropriate steps are

				undertaken to engage with them.
Race		√		The consultation has the potential not to reach people in this strand unless appropriate steps are undertaken to engage with them.
Disability		√		The consultation has the potential not to reach people in this strand unless appropriate steps are undertaken to engage with them.
Gender		√		The consultation has the potential not to reach people in this strand unless appropriate steps are undertaken to engage with them.
Belief / Faith		√		The consultation has the potential not to reach people in this strand unless appropriate steps are undertaken to engage with them.
Sexual Orientation		√		The consultation has the potential not to reach people in this strand unless appropriate steps are undertaken to engage with them.
Other equality issues – please state			√	There are none known.
HR issues			√	There are none known.

If you find a negative impact on any equality group you will need to complete stage one and move on to stage two and carry out a full EIA.

A full EIA will also need to be carried out if this is a high profile or major policy that will either effect many people or have a severe effect on some people.

Is a full EIA	Yes (go to stage	No
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required?	two)	
<p>If no briefly summarise reasons why you have reached this conclusion, the evidence for this and the nature of any stakeholder verification of your conclusion.</p>		
<p>Briefly describe any positive impacts identified that have resulted in improved access or services</p>		

For screenings only:

Review date	
Person responsible for review	
Head of Service signed off	
Date completed	

- Signed off electronic version to be kept in your team for review
- Electronic copy to be forwarded to Equality and Diversity Manager for publishing

Stage 2 – Full Equality Impact Assessment

Page 14 of the guidance

Introduction and background

Using the information from your screening please describe your service or function. This should include:

- **The aims and scope**
- **The main beneficiaries or users**
- **The main equality, accessibility, social exclusion issues and barriers, and the equality strands they relate to (not all assessments will encounter issues relating to every strand)**

If this EIA is part of a project it is important to focus on the service or policy the project aims to review or improve.

This Equality Impact Assessment is a refresh of assessments carried out in 2008 and 2009.

Aims and scope.

It is a statutory duty for the county council to prepare and adopt the Plan so that adequate provision is made for the extraction of minerals in Surrey in accordance with Government and Regional policy and guidance.

There is very little, if any, scope in the selection of sites for the county council to meet Government requirements on the provision of minerals, particularly sand and gravel. Sand and gravel sites in the county are extremely constrained by environmental and social factors (i.e. proximity to local communities). In other words, if the county council are to discharge its responsibilities, the choice of one site as opposed to another elsewhere does not arise due to the paucity of suitable sites.

The aim of the county council in carrying out this responsibility is to adopt a Plan which is sustainable and which would not lead to significant adverse impacts on residents or the environment. The county council aim to engage with as wide a range of residents and representative groups as reasonably possible in preparing the Plan. It makes provision for the range of minerals found and worked in Surrey; soft sand, concreting aggregate, silica sand, clay, oil and gas and building stone. The Plan also makes detailed provision for the restoration of mineral workings, aggregates recycling facilities and rail depots for the importation of minerals (mainly crushed rock and marine aggregate) from outside the county.

Main beneficiaries.

It is essential that there is an adequate and steady supply of minerals to provide the infrastructure, buildings and goods that society, industry and the economy needs. The country as a whole therefore benefits from the provision of the needed minerals. The Plan makes provision for the working and winning of minerals whilst ensuring that there would be no significant adverse impacts arising from the development. In particular, section 6 of the Core Strategy of the Plan sets out how communities and their environment should be protected.

Main equality, accessibility, social exclusion issues and barriers and the equality strands they relate to.

A key outcome for the Plan is one which reflects the views of Surrey communities and which aims to minimise any adverse impact on them. The consultation arrangements for the Plan must therefore be as inclusive as reasonably possible. There is a potential for the six equality and diversity strands to be unaware of the Plan's proposals unless specific steps are taken to engage with them. Potential barriers relate to accessibility issues. The Plan needs to be readily available in accessible ways and places. The Plan must be clear for all its users. A translation service in appropriate languages

improves understanding of the Plan's proposals. Meetings regarding the Plan need to be in accessible locations and at convenient times for people to attend.

Now describe how this fits into 'the bigger picture' including other council or local plans and priorities.

Bigger picture.

The proposals and policies in the Plan apply to the community as a whole. It is a statutory requirement that residents in the areas affected are provided with the opportunity to make representations on the proposals.

Evidence gathering and fact-finding

(Page 15 of the guidance)

What evidence is available to support your views above? Please include:

- **A summary of the available evidence**
- **Identification of where there are gaps in the evidence (this may identify a need for more evidence in the action plan)**
- **Information on contributing factors to inequality.**
- **What information is currently captured with respect to usage and take up of services.**
- **What the current situation is in relation to equality and diversity monitoring (where relevant)**

Evidence - Statutory duty to consult.

In general the county council as Mineral Planning Authority has a statutory duty to consult with the public regarding its proposals in the Plan. Public notice is given by local advertisement and covers the entire administrative area of the county council. Public notice is also given in the county council's web pages. The notice advises the public where, when and for how long the consultation documents can be examined. It also advises to whom and by when any representations regarding the proposals should be made. People are able to examine the consultation documents in public buildings such as public libraries and council offices. People who are unable to visit such buildings can view the consultation documents on the county council's web pages. Those people who are unable to visit such buildings and cannot access the consultation documents by computer are covered by the current custom and practice of the Environment Service, which is to meet any reasonable request for documentation sympathetically.

Evidence - Statement of Community Involvement. Contacting Equality and Diversity strands.

The Statement of Community Involvement (SCI) sets out the county council's policy for public consultation and involvement in the preparation of the Plan. Since its adoption in July 2006, all consultations on the Plan have been conducted in accordance with the SCI, which requires consultations to include groups such as disability groups and ethnic groups.

Evidence – Provision of information for Equality and Diversity strands.

The following provision is set out in the SCI:

'We are happy to provide information about Surrey County Council and the services we provide in (your language), in large print, Braille or on audio tape. To get the information you need phone our contact centre on 03456 009009. We use Language Line, a telephone interpreting service, so at the beginning of your call please let us know which language you would like to speak to us in. We will then get an interpreter on the line to talk to you and you can ask for your information. Email us at contact.centre@surreycc.gov.uk in English or your own language. Write to us in English or your own language.'

This provision accompanies all of the Plan's published proposals.

Evidence – Consultations. General. Contacting Equality and Diversity strands.

The Plan has been the subject of extensive consultation. There is a database of consultees which now numbers over 9,400 names and addresses. A wide range of groups across the Age, Race, Disability, Belief/Faith and Sexual Orientation strands have been consulted. The consultation process included specific targeted attempts to engage with the equality groups. These include:

Disability Groups (over 80), Minority ethnic Groups (16 - including Muslim, Asian, Chinese, Gypsy, Traveller and Baha'I groups), Religious Groups (75 – including Christian, Muslim, Islamic, and Hindu groups), Senior Persons Groups (9), Youth organisations (35) and Sexual Orientation (13).

The following link shows the organisations that are consulted.

<http://www.surreycc.gov.uk/sccwebsite/sccwspublications.nsf/WebLookupFileResourcesByUNII>

Evidence – Consideration of views.

A large number of responses, verbal and written, have been received on the contents of the Plan. These views have been taken into account in the preparation of the Plan. A large number of views have been received from men and women regarding the proposed contents of the Plan. In the nearly 3900 consultation responses received there has been no instance of someone from an equality group asserting that their interests have been discriminated against.

Evidence – Feedback from Equality and Diversity strands.

None of the responses received in the consultations (including targeting the views of older and younger people) highlighted evidence which indicates that there is a discernible impact on the equality strands. In addition direct notification has been given by letter to a number of representative Senior Persons, Minority Ethnic, Racial and Religious, Disability, Sexual Orientation Groups.

Evidence – Enabling access to restored mineral workings for Equality and Diversity strands.

A requirement of the Plan is that all mineral developments are restored to an acceptable after use. This includes matters such as restoring the land to agricultural use, forestry, water features, conservation and amenity uses and the reinstatement of footpaths. At

present, the restoration of mineral workings and rights of way in particular are required to be constructed to a standard which makes them accessible to all. This is set out in the SCC Good Practice Guide for Mineral Site Restoration and Enhancement and the draft Minerals Site Restoration Supplementary Planning Document. The restoration of mineral sites is monitored to ensure site operators comply with all planning conditions.

Evidence – Consultations. Specific

The consultations undertaken for the draft Plan have been extensive. The members of the county council have been briefed on the draft Plan throughout its preparation which included briefings distributed by email. Area Local Committees have also been briefed at key stages of the Plan's preparation by officers attending their meetings and answering questions. The members have provided feedback from the residents in the wards they represent. The means of communicating with local residents and representative groups were extensive and included:

'Issues and Options' Consultation 2003.

An 'Issues and Options' consultation with Surrey residents, Community and Representative Organisations, District and Parish councils, Local committees, neighbouring authorities, the regional planning authority, the government, mineral operators, businesses and environmental groups for 11 weeks between July and September 2003. Three public meetings were held in Reigate, Shepperton and Godalming.

The consultation document set out how the minerals plan was required to take account of the government's objectives for sustainable development, the need for aggregates, location of future development, approach to site identification, recycled and secondary aggregates, site restoration, buffer zones, rail aggregate depots, the transportation of minerals, and issues related to the extraction of clay, oil, gas, chalk, fullers earth and peat.

Potential Sand and Gravel Sites Consultation 2004.

A consultation on the "Assessment of Potential Mineral Zones for Extraction of Sand and Gravel in Surrey" (the PMZ report) was held between September 2004 and March 2005. Over 300 stakeholders were contacted by letter or email when the PMZ report was published. Consultees included county councillors, English Nature, the Environment Agency, parish and district councils, residents' groups and mineral operators. Any organisation or individual who took part in the previous issues and options consultation in 2003 was also notified. During September and October 2004 seven stakeholder meetings were organised across the county in liaison with Surrey Local Committee Directors. All stakeholders who had been contacted about the PMZ Report were invited to attend the meetings. The meetings provided an opportunity for officers to hear stakeholders' comments about the report and mineral working in Surrey. During the consultation period and in response to requests, officers also met with residents groups. The views expressed have been taken into account in the preparation of the Plan.

Stakeholder Meetings 2005.

A full-day stakeholder workshop to assist with the preparation of the draft minerals plan was held on 21 September 2005 at the Runnymede Centre in Chertsey. The event provided an opportunity to discuss the key parts of the draft minerals plan with a diverse range of stakeholders. The issues discussed included draft objectives, policies, and site selection methodology and future consultation strategies. Five evening workshops were held with representatives of communities in areas where large numbers of objections had been received to zones in the PMZ Report. The meetings were held in Mole Valley, Runnymede, Spelthorne, Tandridge and Waverley in June and July 2005.

Stakeholder Meetings 2006.

A full-day stakeholder workshop to provide an update on the progress of the Minerals Plan was held on 16 October 2006 at the Runnymede Centre in Chertsey. The event provided an opportunity to discuss with a diverse range of stakeholders, some key issues which emerged through consultation on the draft Plan. The people attended included representatives of amenity and resident groups, District Councils, the Women's Institute and Farnham Town Council. The main discussions focussed on the methodology for selecting the preferred areas, restoration of mineral sites, and monitoring and enforcement of mineral operations. Detailed information on the site selection process, restoration issues, monitoring and enforcement and invited stakeholders to feed in issues and ideas on these specific areas of the plan. A summary of the outputs from the meeting, copies of the presentations and list of stakeholders attending were sent to participants and published on the SCC website.

Preferred Option Consultation 2006.

A consultation on the draft Surrey Minerals Plan (minerals core strategy, minerals development control policies, primary aggregates, mineral site restoration documents and proposals map) and Draft Sustainability Appraisal took place in April and June 2006. Letters of invitation to comment on the preferred option were sent to interest groups shown in the document 'Consultees on Minerals and Waste Plans and Planning Applications'. Public exhibitions supported by officers were held in Farnham, Sunbury, Staines and Redhill. Over 3000 representations were received. Many of the responses received were from individuals.

Preferred Option Consultation April 2008.

A consultation on the draft Surrey Minerals Plan (Proposed amendments to the Core Strategy Development Plan Document, Policy options for non-aggregate minerals, rail aggregate depots and recycled and secondary aggregates. Silica sand) took place from April to June 2008. Letters of invitation to comment on the preferred option were sent to the interest groups shown in the document 'Consultees on Minerals and Waste Plans and Planning Applications' Over 450 representations were received on the consultation. A half-day stakeholder meeting was held in Dorking on 28 April 2008. The workshop involved a wide range of individuals representing organisations with a particular interest in mineral development such as community groups, statutory bodies (for example the Environment Agency), Surrey borough/district councils and mineral operators. Officers of the county council were

in attendance at the workshop to outline the proposals and to answer questions.

Publication of Core Strategy and Primary Aggregates proposed submission DPDs.
Publication of draft Aggregates Recycling DPD and final draft Minerals Site Restoration
SPD November 2009.

The documents were published for views from 6 November to 18 December 2009. The documents together with supporting information were made available at public libraries, district offices, county hall and on line at www.surreycc.gov.uk/mineralsplan. 20,000 response forms were printed for representations to be made on the Core Strategy and Primary Aggregates DPDs. The response form was also available on line at the address shown above. 20,000 Leaflets were also printed, including a response form, summarising the proposals for the draft Aggregates Recycling DPD and the final draft Minerals Site Restoration SPD. The response form was also available on line.

Over 9000 letters of inviting views on the documents were sent to the interest groups in the 'Consultees on Minerals and Waste Plans and Planning Applications'. Presentations of the proposals were given to the Tandridge, Spelthorne, Runnymede, Waverley, Reigate and Banstead Local Committees.

Two 'drop in' exhibition sessions in November were provided for residents of Sunbury, Shepperton and Stanwell in Spelthorne to discuss the proposals and put questions to county council officers. 515 people and organisations made representations to the proposals.

Gaps in the evidence.

There are no discernible gaps in the evidence.

Information currently captured with respect to usage and take up of services.

All representations that are made to the Plan's proposals are recorded and provided in a consultation feedback report which is published on the web site. The report sets out the specific comments made and provides a summary of main issues raised. The county council's response to all of the issues is provided and a clear indication given of any action taken in preparing the contents of the Plan as a result of the representations.

Current situation in relation to equality and diversity monitoring.

The proposals and policies in the Plan apply to the community as a whole and the evidence that is available does not suggest that the impact on any equality and diversity strand group is any different from the impact on the general Surrey population. The evidence is available through the county council's formal complaints procedure. This procedure is managed such that learning points are taken from complaints and used to improve the service. The complaints are monitored quarterly. To date, no complaints have been received regarding equality and diversity issues in connection with the preparations of the Plan.

There are currently no arrangements to monitor representations made to the Plan in

terms of which equality and diversity strand a respondent is in.

Sources of evidence may include:

- Service monitoring reports including equality monitoring data
- User feedback
- Population data – census, state of the county, Mosaic
- Complaints data
- Published research, local or national.
- Feedback from consultations and focus groups
- Feedback from individuals or organisations representing the interests of key target groups
- Evidence from partner organisations, other council departments, district or borough councils and other local authorities

How have stakeholders been involved in this assessment? Who are they, and what is their view?

The assessment has been scrutinised at all stages by the Environment Service Equality and Diversity Group, the Environment & Infrastructure Directorate Equality Group, and the Surrey County Council Equality and Diversity Manager

Analysis and assessment

Given the available information, what is the actual or likely impact on minority, disadvantaged, vulnerable and socially excluded groups? Is this impact positive or negative or a mixture of both? (Refer to page 17 of the EIA guidance for full list of issues to consider when making your analysis)

Analysis

There is no evidence to suggest that the proposals and policies in the Plan is likely to impact on people in the equality and diversity groups any differently from the impact on the general Surrey population. It should be noted that no new mineral development takes place directly as a result of the Plan; before new mineral development takes place the Minerals Industry must submit planning applications to Surrey County Council as Mineral Planning Authority for assessment and determination. An Equality Impact Assessment has been carried out on the process of determining planning applications for mineral development which found that there was no discernible impact on the equality and diversity strands.

Assessment

The preparations of the Plan include public consultation with the local community and representative organisations including the full range of equality and diversity strands. This area has been the main focus of this EIA. There will be on going consultations and engagement with the equality and diversity groups, as with other key statutory consultees.

The main finding of this EIA is that the approach to the six equality and diversity strands in preparing the Plan was inclusive. On the basis of consideration by the EIA Environment team, the spread of groups contacted and the absence of any complaints or specific issues around negative impact from these groups, no evidence has been found to indicate that there has been any discernible adverse impact or discrimination against any of the strands.

Some improvements are recommended but it is concluded that all areas affected by the Plan are being dealt with in a satisfactory manner.

What can be done to reduce the effects of any negative impacts? Where negative impact cannot be completely diminished, can this be justified, and is it lawful?

It is considered that there are no negative impacts in the view of the detailed steps taken in the consultation process. Improvements are monitored through the Planning Service Equality and Diversity Action Plan.

Where there are positive impacts, what changes have been or will be Made, who are the beneficiaries and how have they benefited?

The restoration of mineral workings to nature conservation uses presents opportunities to enable access for all. The Plan encourages such provision and indicates examples of how the needs of wheel chair users can be accommodated in the restoration.

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<p>Recommendations</p> <p>Please summarise the main recommendations arising from the assessment. If it is impossible to diminish negative impacts to an acceptable or even lawful level the recommendation should be that the proposal or the relevant part of it should not proceed.</p>
<p>It is the intention of the county council to require that all public consultations be accompanied by a request for consultees to indicate when they respond whether they fall into one or more of the equality and diversity groups. Following the issue by the county council of the detailed advice and its implementation, this could form a part of further publication of parts of the Plan.</p>

Action Plan – actions needed to implement the EIA recommendations

Issue	Action	Expected outcome	Who	Deadline for action
Publicity	Publish findings of this EIA	Assessment on web site	Les Andrews	January 2010
Identification of equality and diversity groups responding to consultations	Accompany consultations with request for consultees to identify if they fall into an equality and diversity group	Report analysing responses received	Les Andrews	December 2010
Accessibility	Incorporate 'EasyRead' message in documents offering access for translations.	'EasyRead' message included in published documents.	Les Andrews	December 2010
Learning	Share learning with others in the	Awareness of best practice	Les Andrews	Ongoing

	council about the good practice on consulting communities and equality interest groups gained from this exercise			

- Actions should have SMART Targets
- Actions should be reported to the Directorate Equality Group (DEG) and incorporated into the Equality and Diversity Action Plan, Service Plans and/or personal objectives of key staff.

Review date	February 2011
Person responsible for review	Les Andrews
Head of Service signed off	Roger Hargreaves
Date completed	09 February 2010
Date forwarded to EIA coordinator for publishing	

- **Signed off electronic version to be kept in your team for review**
- **Electronic copy to be forwarded to your service EIA coordinator**