

Equalities Impact Assessment

Name of Officer/s completing assessment:
Chris Watts, Principal Planning Officer

Date of Assessment: 12 March 2021

1. What are the potential impacts of the proposal? (describe the proposals and any initial consultation that have informed the identification of impacts)

The Manual for Streets states that; “7.2.10 ...shared surfaces can cause problems for some disabled people. People with cognitive difficulties may find the environment difficult to interpret. In addition, the absence of a conventional kerb poses problems for blind or partially sighted people, who often rely on this feature to find their way around. It is therefore important that shared surface schemes include an alternative means for visually-impaired people to navigate by.”

The DfT in its letter dated 28 September 2018 states that ‘A proportionate approach should also be taken in applying related aspects of the National Planning Policy Framework, so that the nature of each site, its surroundings and its users are taken properly into account. Giving priority to pedestrians and cyclists, and addressing the needs of people with disabilities or reduced mobility, does not mean that segregated footways or cycle paths are always required. This is especially the case where traffic volume and speed will be low, such as within small housing schemes, or those parts of larger schemes designed as mews or cul-de-sac.’ The wording specifically refers to the use of shared space on small housing schemes or part of a larger scheme designed as a mews or cul-de-sac.

Comments have been received and insight from potential user groups raising concerns about the use of some shared surface roads and private shared drives. Comments in respect to the safety of potential user groups and concerns have been raised by EPC. Where it has not been possible to receive comments from the various user groups in relation to these, it is noted that the general position is that Disabled groups, and other organisations representing people with disabilities, are generally not in favour of shared surface roads.

Concerns raised by EPC regarding the distribution and positioning of some of the car parking and visitor spaces. Some concerns raised regarding garage sizes.

Some additional risk from EV vehicles due to their quietness, to people who are deaf or hearing impaired has been identified. Concerns raised regarding hybrid vehicles which pre-date Acoustic Vehicle Alert System (AVAS) and the fact that AVAS will only work up to 12mph.

Concerns raised by EPC and Norfolk Constabulary regarding the placement of certain collection points and the distance between BCPs and the properties they serve. Some collection BCPs exceed guidelines in terms of drag distances.

Letter from Hewitsons, representing EPC, (Dated 13/10/20) in relation to the development proposals:

1. Shared Space Roads – Hewitsons Contend that the shared space roads are in contravention to current DfT Guidance on shared space roads.
2. Access and Parking – the development does not provide sufficient parking, especially for the affordable housing units. Moreover, the use of visitor parking which is not directly connected to a footpath does not comply with the requirements of the Equality Act 2020.

2. Which protected characteristics under the Equalities Act 2010 does this proposal impact:

(indicate whether the impact could be positive , neutral , or negative)			
Protected Characteristic	Potential Impact		
	Positive	Neutral	Negative
Age		✓	
Disability		✓	
Race		✓	
Sex		✓	
Religion or Belief		✓	
Sexual Orientation		✓	
Marriage/Civil Partnership		✓	
Pregnancy/Maternity		✓	
Gender Reassignment		✓	
Which additional Communities characteristics does this proposal impact?			
Health		✓	
Place inc. Rurality	✓	✓	
Low Income and Poverty	✓	✓	

3. What are the potential equalities impacts of this proposal?

(where there are potential negative impacts for protected characteristics these should be detailed including consideration if the equality duty, proposals for how they could be mitigated and consulted on)

How do the potential impacts affect people with protected characteristics?	How is it proposed that any identified negative impacts are mitigated or explain why it is not possible	How will we consult
<ul style="list-style-type: none"> Concerns regarding the use of shared roads on residential developments... Report by the Women and Equalities Committee ...“Are a source of concern to many disabled people across the country”. 	<ul style="list-style-type: none"> Fewer shared surfaces are now proposed across this phase of the development than originally submitted in response to comments received. 	<ul style="list-style-type: none"> Consultees written to regarding the application proposals and asked to comment. Consultees included: Vision Norfolk; NFBUK (The Voice of Blind People); Norwich & Norwich SEND Association;

<p>President of the National Federation of the Blind UK ...“A pavement gives the opportunity for a blind person to access the local area knowing that they will not walk into moving traffic and this is as important in any housing estates as it is in any town or city centre.”</p> <p>The UK Government statutory Disabled Persons Transport Advisory Committee“shared space conflicts with the duty to adjust any built environment design to anticipate safe use by all blind and disabled people”.</p>	<ul style="list-style-type: none"> • Some shared surfaces amended to include a carriageway with a single footway alongside the length of the road edge. • Where shared surfaces remain, these are on relatively short lengths of road, serving a limited number of dwellings. • Having regard to the road types proposed within the development, which have been designed to try and create a sense of place and also to encourage low vehicle speeds, it is considered that the proposals have had due regard to the impacts of this proposal and on those groups with protected characteristics. • In respect of parking provision, amendments have been made in response to comments to ensure car parking is better integrated into the development. All dwellings are provided with off-street parking, the majority of which are provided in direct association with the plots that they serve, either located to the side of dwellings with individual parking spaces and garages set back from the building line, or in parking bays in front and close to dwellings. Visitor parking is also provided and is located throughout the development. • Minor conflicts identified with regards to the sizes of some garages (some being short by approx. 15mm in length and 45mm in width). However parking provision remains sufficient. • Risk associated with EVs is considered neutral to minor due to the circumstances of the site design and layout, such as the residential street environment serving a limited number of dwellings, which is subject to low traffic volumes and low vehicle speeds and dedicated pedestrian footpaths in most locations. 	<p>Norwich City Dementia; Action Alliance; Equal Lives; Norfolk And Waveney Local Medical Council; NHS England.</p> <ul style="list-style-type: none"> • Extensive discussions have taken place with EPC regarding groups impacted. • Discussions and evidence have resulted in amendments to the scheme and steps to mitigate impacts. • The above has informed the decision-making process.
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	<ul style="list-style-type: none"> • Amendments made to location of some bin collection points (BCP's). Each dwelling has space within their rear gardens to store refuse bins for both convenience to the householder. • some BCPs continue to exceed guidelines in terms of drag distances, however it is considered that on balance, the distances are acceptable when having regard to their general positioning and the fact that the vast majority of households will not need to carry refuse more than 30m to storage areas and that these are mostly within 25m of waste collection points. 	
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4. Summary of consultation feedback and further amendments to proposal / mitigation

Discussions with NCC Highways and Persimmon Homes regarding the concerns of EPC and discussed in the context of the current guidance.

Consultation has taken place with Vision Norfolk; NFBUK (The Voice of Blind People); Norwich & Norwich SEND Association; Norwich City Dementia; Action Alliance; Equal Lives; Norfolk And Waveney Local Medical Council; NHS England.

Comments received from NFBUK (The Voice of Blind People), summarised as follows:

The UK Government statutory Disabled Persons Transport Advisory Committee carried out a wide-ranging review of shared space forms of street design in June 2018, and looked into what it means for blind and a range of other disability groups. The Review is published on gov.uk , and it concluded, among other things, that shared space conflicts with the duty to adjust any built environment design to anticipate safe use by all blind and disabled people. See: <https://www.gov.uk/government/publications/dptacs-position-on-shared-space>

These findings have been taken on board by the government, with cancellation of its previous guidance about shared space, and public webinars for road design professionals drawing attention to the disability adjustment duty. In July 2020, a new requirement for all new cycle infrastructure schemes came into force, stating that they should be independently audited for access, covering both existing and proposed new features, and thereby ensure that no blind and disabled people are excluded from use of any street or public place as pedestrians.

The Parish Council will be aware of new neighbourhood planning options for local communities to gain more control over how their localities are affected by local planning. The Planning Aid England charity can be asked by Parish or community groups if there are particular types of planning threat which they need professional help with. Enclosed is a copy of recent guidance issued by Planning Aid England on the general topic of required disability adjustments.

Comments received from Vision Norfolk, summarised as follows:

I am writing to advise that Vision Norfolk/NNAB (Norfolk and Norwich Association for the Blind) will be responding to the above in due course; unfortunately the pandemic and staffing issues have resulted in us being unable to comment in December. We will be in contact as soon as we possibly can.

Amendments made in response to consultation feedback and discussions with EPC, summarised as follows:

- Some shared surfaces omitted and amended to include a carriageway with a single footway alongside the length of the road edge.
- Car parking revised and better integrated into the development. All dwellings provided with off-street parking, the majority of which are provided in direct association with the plots that they serve, either located to the side of dwellings with individual parking spaces and garages set back from the building line, or in parking bays in front and close to dwellings.
- The visitor parking around the loop road and both cul-de-sacs has been raised 25mm above the pedestrian margin and / or the carriageway. Other amendments also made to visitor parking to address concerns.
- Amendments made to location of some bin collection points (BCP's).
- Type 6 Road design enhanced to provide additional safety measures for those members of public using the roads. These include:
- Use of a pedestrian margin to create a split-level delineated zone clearly separate from the main carriageway.
- The carriageway width reduced to 4.30m and the pedestrian margin width increased to 1.50m from 1.00m. The minimum road width advised in the UK is 4.10m.
- The upstand kerb separating the carriageway from the pedestrian margin would be 50mm high rather than the standard 25mm high.
- The cul-de-sacs incorporate road narrowing's with vertical deflection raised tables.

Having regard to the Council's duties under section 149 of the Equality Act 2010, it is considered that the proposals as amended, provide appropriate mitigation to the impacts identified above. As such no further alteration to the scheme is proposed because of the EqIA.

Signed by evaluator: C Watts