

APPENDIX E

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Dartford Local Plan
Date of assessment	15/11/2023
Directorate and Service	Planning Services – Planning Policy
Manager	Mark Aplin
Officer conducting assessment	Roger Comerford
Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	The Local Plan provides a strategy for housing and economic growth across the Borough to 2037. It sets out strategic and development management policies relating to the built and natural environment of Dartford and guides the way in which development will come forward.
2. Who will be affected by the activity or proposal?	All residents, employees, businesses, and organisations within the Borough of Dartford.
3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	<p><u>Corporate Plan 2021-2023</u></p> <p><u>Overall Vision</u></p> <p><i>"To make Dartford a place of quality, choice and safety. A place where great communities, concern for the environment and a successful economy support people who want to live, work and enjoy leisure time."</i></p> <p>The Local Plan is key to delivering the Council's Overall Vision for the area. It determines how its area will change, and how land and buildings will be used in the future. The Local Plan guides decisions on public and private sector investment and Plan takes on board the priorities of the Council, government, infrastructure providers, residents, Parish/ Town councils, businesses and other local organisations.</p> <p><u>Values</u></p> <p><i>'Transparency in Decision Making: The decisions taken by the Council will be made in an open and transparent manner through the Council's governance framework. The Council will be accountable for the decisions it makes and how tax payers' money is spent'</i></p>

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	<p>The Local Plan sets out how the Council intends to guide future development in the Borough in a planned and transparent way. The policies and objectives of the Local Plan have been subject to public consultation and open public participation.</p> <p><i>‘Valuing the town’s Heritage, celebrating its character: Ensuring our built heritage is preserved for future generations and resisting inappropriate, featureless development when we are able.’</i></p> <p>The Local Plan has a ‘Historic Environment Strategy’ to ensure that development contribute to the conservation and enjoyment of the Borough’s historic environment. It contains polices to protect Historic assets, both designated and non-designated.</p> <p><i>‘Working in Partnership: The Council will work with a range of organisations, communities and individuals to deliver improvements to the Borough’.</i></p> <p>The plan has been produced in consultation with statutory agencies, community groups, businesses and residents. Delivery of Local Plan policies will be based on partnership working with stakeholders. The Council, along with the Ebbsfleet Development Corporation where applicable, will continue to lead the local co-ordination of infrastructure, working in partnership with service providers to identify, prioritise and secure the funding and, where necessary, land to deliver infrastructure. Planning decisions, which are also consulted upon, must be taken in accordance with the Development Plan unless material considerations indicate otherwise.</p> <p><u>Strategic Objectives</u></p> <p><i>ED1 Improve the quantity and range of jobs in the Borough</i> <i>ED3 Encourage a diversification of economic activity</i> <i>ED4 Encourage the development of clean/green economic activity</i></p> <p>The new Local Plan will positively and proactively encourage job growth in sustainable locations and economic development in planned priority regeneration areas. To protect local industry and employment, including across the south of the Borough, it proposed to retain the existing designated employment areas.</p>

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	<p>Intensification through redevelopment for economic purposes is also proposed and expanding some of the designated employment areas.</p> <p>The Plan encourages proposals for knowledge-based creative or high technology industries, and the provision of managerial or professional jobs to improve the range of employment opportunities in the Borough. Additionally, a new policy has been introduced that requires large non-residential development to ensure they are providing commercial premises suitable for small scale start-up and move-on business and opportunities for skills training and/or apprenticeships.</p> <p>A key chapter of the Local plan is dedicated to Central Dartford. The intention of this chapter is to secure the Town Centres’ regeneration and harness development to improve economic performance and make it an enticing and inviting place that people want to live, work or visit.</p> <p><i>ED2 Ensure the delivery of timely and environmentally sustainable transport infrastructure to support growth</i></p> <p>A key focus of the Plan is to direct development to sustainable/ accessible locations and help take forward beneficial transport schemes such as improvements to Fastrack and bus provision, as well as enhancements to key road junctions. The aim is to minimise the need to travel through the design and location of development and at the same time shift movement patterns towards the use of public transport.</p> <p><i>HW1 Increase the opportunities for participating in sporting, cultural and leisure</i> <i>HW 2. Reduce overall health inequalities in the Borough</i></p> <p>The Local Plan aims to retain existing open spaces, including playing pitches when needed and new open spaces have been identified for designation of ‘Borough Open Space’ which offers policy protection from inappropriate development. Dartford will continue to require all new development to provide a specific quantity of public open space, in accordance with existing requirements, but the policy has been strengthened to ensure that the space is usable and of good quality. In addition, the policy for Dartford town centre will address the potential for new leisure uses and cultural services to complement the attractions of the town centre.</p> <p><i>E1 Reduce carbon emissions and improve air quality in the Borough</i></p>

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	<p>The Local Plan encompasses measures to address carbon emissions and improve air quality. A range of measures to minimise carbon emissions and address climate change are outlined, including: locating new development in tandem with transport infrastructure to minimise the need to travel, seeking improvements to public transport, requiring energy efficient development design, supporting the provision of low carbon energy supply, encouraging re-use and recycling in construction and in the home and encouraging the use of electric vehicles. Air quality is primarily addressed through an approach to transport which focuses on minimising car travel and congestion and promoting more sustainable modes of travel. In addition, policy ensures that new development is located and designed in such a way as to minimise exposure to poor air quality.</p> <p><i>ET2 Ensure that development in Dartford is sustainable, with high standards of design, layout and water/energy efficiency.</i></p> <p>The Local Plan maintains the requirement that development must meet strict water efficiency standards and be designed, located and constructed to minimise the need regulate internal temperatures and to reduce energy consumption. In addition, large residential schemes are encouraged to incorporate grey-water recycling systems and/or other low-carbon technologies.</p> <p><i>ET4 Ensure a high quality street scene</i></p> <p>The Plan promotes attractive neighbourhoods with a real sense of place that reflect the area’s heritage and also to promote high quality built design. In addition, sites that have been allocated for development have clear accompanying policies outlining the quality expected, with many required to contribute to the public realm.</p> <p><i>HS 1. To meet local housing needs and promote sustainable growth.</i> <i>HS 2. To increase the supply of high quality affordable homes.</i> <i>HS 3. To improve the housing circumstances of those most in need</i> <i>HS 4. Enabling the best use of housing to meet the needs of local people.</i> <i>HS 5. Supporting a strong, high quality, private rented sector.</i></p> <p>The Plan sets forth a strategy that will meet the Borough’s current local housing needs within the Borough predominantly through the use of previously developed land. Sufficient suitable and developable housing</p>

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	<p>land has been identified to achieve that aim. The Plan aims as fully as possible consistent with sustainable development principles to meet local affordable and specialist housing needs, and the needs for Gypsy and Traveller accommodation.</p> <p>The Plan should contribute positively to the following indicators in the Corporate Plan 2021-23:</p> <ul style="list-style-type: none"> • BI2 District wide unemployment rate • BI3 Town Centre footfall • BI4 Number of new homes built annually • BI11 Number of new homes delivered • BI12 Number of affordable homes completed • Biodiversity & Carbon Capture • PCS1 Usage of Borough Council sports facilities • BI5 Overall life expectancy in the Borough • BI7 % of adults achieving at least 150 minutes of physical exercise per week • PPI29 Community Infrastructure Levy Income • PPI31 Delivery of key projects
<p>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</p>	<p><u>Section 19(1B) – (1E) of the Planning and Compulsory Purchase Act 2004</u> sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents (taken as a whole).</p> <p>Under <u>regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)</u> local planning authorities must review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Most plans are likely to require updating in whole or in part at least every 5 years. Reviews should be proportionate to the issues in hand.</p> <p>The development plan for an area is made up of the combination of strategic policies (which address the priorities for an area) and non-strategic policies (which deal with more detailed matters). Paragraphs 17 to 19 of the <u>National Planning Policy Framework (NPPF)</u> describe the plan-making framework which allows flexibility in the way policies for the development and use of land are produced.</p>

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	<p><u>Section 19 of the Planning and Compulsory Purchase Act 2004</u> sets out specific matters to which the local planning authority must have regard when preparing a local plan.</p> <p><u>Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012</u> prescribe the general form and content of local plans and adopted policies maps, while <u>regulation 10</u> states what additional matters local planning authorities must have regard to when drafting their Local Plan.</p> <p>The duty to cooperate was introduced by the Localism Act 2011, and is set out in <u>section 33A of the Planning and Compulsory Purchase Act 2004</u>. It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan in the context of strategic cross boundary matters. Certain other public bodies are also subject to the duty to cooperate. These are prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. These organisations are required to cooperate with local planning authorities and county councils in England, and the other prescribed bodies. All parties should approach the duty in a proportionate way, tailoring cooperation according to where they can maximise the effectiveness of plans.</p> <p><u>Section 19 of the Planning and Compulsory Purchase Act 2004</u> requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a plan during its preparation. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered) [NPPF para. 32].</p> <p>The National Planning Policy Framework (NPPF) sets out government's planning policies for England and how these are expected to be applied. Local Plans are produced within the parameters of and in accordance with tests of soundness set by national policy through the NPPF. Plans must address local issues, whilst being consistent with national policy.</p> <p>The NPPF sets out a requirement for Plans to be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. In addition, their preparation needs to be underpinned by relevant and</p>

Customer Access Review – Full Assessment

Step 1: Scoping the assessment	
	<p>up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned [NPPF para. 16].</p> <p>In relation to equality and diversity, national planning policy requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) [NPPF para. 61].</p> <p>The requirements for this specific stage of the process of public consultation on the Local Plan are specified in <u>Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012</u>. Under the regulation the local planning authority is required to notify general and specific consultation bodies that were consulted at the previous stage of public consultation (regulation 18) to make them aware that the proposed submission documents are available for inspection.</p> <p>Those consultation bodies include both statutory consultees such as the Environment Agency, Heritage England, Natural England etc. that the authority consider may have an interest in the plan and general consultation bodies it considers appropriate to make representations, such as:</p> <ul style="list-style-type: none"> • voluntary groups; • bodies that represent the interests of different racial, ethnic or national groups in the area; • bodies which represent the interests of different religious groups in the area • bodies which represents the interests of disabled persons in the area <p>In preparing the local plan, the local planning authority must take into account representations made to them.</p>
Step 2: Information collection	
<p>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race,</p>	<p>Information has been drawn from various sources such as the Census and other studies/research which show demographic information on population change, housing, income, ethnicity, and employment.</p> <p><u>Race</u></p>

Customer Access Review – Full Assessment

Step 2: Information collection	
<p>sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<p>In 2021, 10.5% of Dartford residents identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category, up from 3.7% in 2011. The 6.8 percentage-point change was the largest increase among high-level ethnic groups in this area.</p> <p>9.9% identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 6.0% the previous decade).</p> <p>The percentage of people who identified their ethnic group within the "Mixed or Multiple" category increased from 2.2% in 2011 to 3.1% in 2021</p> <p><i>Gypsies and Travellers</i></p> <p>The Council commissioned a Residential Needs and Gypsy and Traveller Accommodation Assessments which informed the Local Plan. The Dartford and Ebbsfleet Residential Needs Assessment used data from various sources to assess the needs for different types of housing. This includes the needs of older people, those with disabilities, families with children and younger people. The Gypsy and Traveller Accommodation Assessment used a range of methods to assess needs.</p> <p><u>Disabled</u></p> <p>In Dartford, the proportion of people who were identified as being disabled and limited 'a little' in the 2021 Census was 9.3% (down from 9.7% in 2011). The percentage of people who were identified as being disabled and limited 'a lot' was 6.6% (down from 8.1% in 2021).</p> <p>Data from the Department of Work and Pensions on benefit claimants (working-age client group) for November 2016 (most recent available as of Nov 2023) shows that in Dartford Borough 2,770 (4.1%) are on ESA and Incapacity Benefits and 580 (0.9%) are disabled. The figure for ESA and Incapacity Benefits are below the regional (4.4%) and national (6.1%) average.</p> <p>Data from the Department of Work and Pensions indicates that as at April 2022 there were 3,703 people in Dartford in receipt of Personal Independence Payments (PIP), which equated to 4.2% of the population aged 16+ in the Borough (Source: Kent Analytics 'Benefit Claimants in Kent')</p>

Customer Access Review – Full Assessment

Step 2: Information collection	
	<p>The Residential Needs Assessment finds that the number of those aged 65 or over with a limiting long-term illness that limits them a lot is expected to increase by 50.0% between 2019 and 2036 in Dartford. This compares to an increase of 78.4% in the number of people aged 18-64 in Dartford with impaired mobility, a rise of 22.5% in the number of people aged 18-64 in Dartford with a common mental health disorder, an increase of 65.8% in the number of people aged 65 or over with dementia and an increase of 33.1% in the number of people in Dartford with a moderate or severe learning disability. The Assessment identifies that the number of those aged 65 or over that are unable to manage at least one mobility activity on their own is expected to increase by 57.6% between 2019 and 2036, compared to an increase of 55.2% in the number of people aged 65 and over who need help with at least one domestic task, an increase of 15.8% in the number of people aged 65 and over who need help with at least one self-care activity and an increase of 26.2% in the number of people aged 18-64 with a serious personal care disability. These changes better reflect the projected change in the demographics of the population (an ageing population) rather than a notable change in the overall health of people. Data sources imply that a notable uplift will be required to the number of homes that currently meet the accessible and adaptable dwelling M4(2) standard criteria. The study found that there will also be a requirement for M4(3) category homes – wheelchair user dwellings.</p> <p><u>Age</u></p> <p>The Residential Needs Assessment study finds that the housing projections suggest that there will be an increase in the number of households headed by someone over 65 from 10,185 in 2019 to 15,606 in 2036, an increase of 53.2%. The projections also indicate that the proportion of older persons living alone in Dartford will increase from 44.7% in 2019 to 47.3% in 2036. The Assessment concludes that, given the dramatic growth in the older population and the high levels of disability and health problems amongst older people, there is likely to be an increase requirement for specialist housing options. The study concludes that there is a requirement for additional specialist units for older people.</p> <p><u>Religion</u></p> <p>The 2021 Census shows the religion of Dartford residents as follows:</p> <ul style="list-style-type: none"> • Christian: 48.1% • No religion 36.5% • Hindu: 3.8%

Customer Access Review – Full Assessment

Step 2: Information collection	
	<ul style="list-style-type: none"> • Muslim: 3.5% • Sikh: 1.7% • Buddhist: 0.6% • Jewish: 0.1% • Other: 0.4% <p><u>Marriage & Civil Partnership</u></p> <p>The 2021 Census shows that of all Dartford residents aged 16+, 60.65 are living in a couple. 45.2% are married or in a civil partnership, of which 44.8% are an opposite sex couple and 0.2% a same sex couple.</p> <p>15.8% of Dartford adult residents are living as a couple cohabiting, of which 15.2% are an opposite sex couple and 0.6% are a same-sex couple.</p> <p><u>Sexual Orientation</u></p> <p>The 2021 Census shows that of Dartford residents aged 16+, 1,047 (1.2%) identify as gay or lesbian and 822 (0.9%) as bisexual. 221 (0.2%) have a gender identity different from sex registered at birth but no specific identity given. 105 (0.1%) identify as a trans woman and 85 (0.1%) identify as a trans man¹.</p>
<p>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</p>	<p>Throughout the development of the Local Plan, the Council has carried out consultation with government, infrastructure providers, residents, Parish/ Town councils, businesses and other local organisations representing diverse interest groups.</p> <p>There were two formal early periods of public consultation, governed by Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations set forth the consultees that the Council must engage with. All those on the Council’s consultation list were given the opportunity to comment on the key issues and approaches set forward in the consultation documents. This included groups representing gypsies, disabled people, older people and religious groups. The Council also advised the Dartford Elders’ Forum and the Dartford Youth Council of the consultations.</p>

¹ Source: 2021 Census table TS078, The Office for National Statistics (ONS), presented by Kent Analytics, Kent County Council.

Customer Access Review – Full Assessment

Step 2: Information collection	
	<p>Following this, in early 2021 the Council carried out a period of consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 where the public made representations on the legal soundness of the Plan. The Council reviewed all representations and made relevant changes to the Plan. As such, a second period of consultation under Regulation 19 was initiated out in December 2021, principally to address environmental issues (a new SSSI was notified).</p> <p>In January 2023 a focused consultation took place in relation to new evidence on Gypsies and Travellers and the Duty to Cooperate.</p> <p>The Council published Main Modifications to the Local Plan in July 2023, which were subject to a further period of statutory public consultation culminating in September 2023..</p> <p>Details of how consultations were carried out, including who was contacted and details of the contact, were published online and submitted to the Planning Inspector as part of the Local Plan examination process.</p>
<p>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</p>	<p>No.</p>

Step 3: Assessing the equality impact				
8	<p>Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the General Equality Duty:</p> <ul style="list-style-type: none"> a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations 			
	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN

Customer Access Review – Full Assessment

a	Age	<p>Providing for the future accommodation needs of an ageing population. Requiring delivery of infrastructure including improved transport networks and new healthcare/ community facilities.</p> <p>A new policy has been introduced to ensure residential accommodation includes sufficient amenity space and there is criterion within the policy that the amenity space should be suitable for the needs of children’s play/ leisure needs.</p>	None	<input type="checkbox"/>	<input type="checkbox"/>
b	Disability	<p>Enabling provision to meet needs for accessible/adaptable and wheelchair user accommodation. Requiring delivery of infrastructure including improved transport networks and new healthcare/ community facilities.</p> <p>Increase of affordable housing requirement.</p>	None	<input type="checkbox"/>	<input type="checkbox"/>
c	Gender (including reassignment)	N/A	N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d	Race	The Plan allocates three sites for the future accommodation needs of gypsies, travellers and travelling show-people.	<p>The Plan identifies and allocates land to meet the future needs of gypsies, travellers and travelling show-people.</p> <p>There is a generally positive development management approach to windfall development to meet identified needs. A specific development management policy (M11) has been included in the Plan to ensure that further sites can be identified and that planning applications can be determined expeditiously in line with set criteria.</p>	<input type="checkbox"/>	<input type="checkbox"/>

Customer Access Review – Full Assessment

			However, there is a slight risk of a long-term shortfall in pitches. The Council will continue to monitor delivery and take affirmative action if necessary.		
e	Religion/Belief	Protecting community uses including places of worship from being redeveloped.	None	<input type="checkbox"/>	<input type="checkbox"/>
f	Sexual Orientation	N/A	N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g	Pregnancy/Maternity	N/A	N/A	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	If ‘no impact’ or ‘unknown’ was selected, please explain	The proposals contained in the Local Plan are not related in any meaning and tangibly direct sense to the protected characteristics of gender, sexual orientation, and pregnancy/ maternity. The Plan requires social infrastructure, such as healthcare facilities, to be provided, this will indirectly have a positive impact on all residents but especially for those during pregnancy/ maternity.			
10	If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	Many of the policy proposals would apply to developments within Ebbsfleet Garden City area where decisions on planning applications are taken by the Ebbsfleet Development Corporation rather than Dartford Borough Council. However, the EDC’s decisions on planning applications need to be in accordance with policies in the Dartford Borough Council Local Plan and no circumstances are envisaged that would give rise to negative equality impacts between different groups.			
11	Any other comments				

Customer Access Review – Full Assessment

Step 4: Action plan

12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:
 a) any gaps in information and consultation
 b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
N/A	N/A	N/A	N/A	N/A	N/A

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
N/A	N/A	N/A	N/A	N/A	N/A

Step 5: Decision making and future monitoring

13	Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	The final Adoption Plan is subject to full council approval.
14	How will you continue to monitor the impact of the activity or proposal on the equality groups?	The Authority Monitoring Report measures the provision of Gypsy and Traveller accommodation, accessible/adaptable and wheelchair housing.
15	When will you review this Customer Access Review?	This is the final Customer Access Review.