

## Equality Impact Assessment (EqIA) for Policies, Procedures and Services

<b>Proposal name</b>	<b>Willenhall Framework Plan: Phase 1 (Moat Street and Villiers Street)</b>		
<b>Directorate</b>	Economy, Environment and Communities		
<b>Service</b>	Regeneration, Housing and Economy		
<b>Responsible Officer</b>	Joel Maybury		
<b>Proposal planning start</b>	10/2/21- date when Cabinet supported preparation of a Framework Plan and authorised negotiations with landowners within the draft boundary for Moat Street and Villiers Street (Phase 1)	<b>Proposal start date (due or actual date)</b>	9/2/22 – date when Cabinet supported the completed Framework Plan and approved the in-principle use of the Council's compulsory purchase powers for delivery of Phase 1
<b>1</b>	<b>What is the purpose of the proposal?</b>	<b>Yes / No</b>	<b>New / revision</b>
	Policy	No	N/A
	Procedure	No	N/A
	Guidance	No	N/A
	Is this a service to customers/staff/public?	yes	The proposed new homes will be available for the public to live in
	If yes, is it contracted or commissioned?	No	Procurement of a developer partner is in progress

	Other - give details	<p>The Framework Plan sets out a 10-year vision for Willenhall which provides an ambition for housing growth and healthy, prosperous communities.</p> <p>This EqIA is being prepared to ensure that equalities issues/impacts are considered appropriately for Phase 1 of the Willenhall Framework Plan.</p> <p>Officers are seeking a resolution from Cabinet in July 2023 for the Council to use its compulsory purchase powers.</p>	New
2	<p><b>What is the business case for this proposal? Please provide the main purpose of the service, intended outcomes and reasons for change?</b></p> <p>Willenhall has been identified as an area for strategic intervention with Cabinet previously agreeing to support a targeted programme of activity to regenerate the area. This has been strengthened by the planned opening of the new railway station and promotion of the Walsall Growth Corridor as a priority for housing delivery. There is therefore a real opportunity to promote Willenhall as a place that people aspire to live, work, and spend leisure time.</p> <p>A Framework Plan established for Willenhall considers the opportunities and challenges that exist and identifies specific Areas of Opportunity within the wider Plan boundary supported by strategies relating to Movement, Green Spaces and Place Making.</p> <p>The area covered by the Framework Plan has been identified to deliver comprehensive housing growth across the heart of the town. The Framework Plan aims to deliver around 500 high quality homes over a 10 year period. The housing delivered will include a mix of styles, types and tenures including specialist housing providing housing choice which addresses local need and attracts people to remain in and relocate to Willenhall.</p> <p>The Framework Plan identifies Phase 1 intervention as the Moat Street / Villiers Street site. The proposed approach to delivery of Phase 1 is that the Council acts as a facilitator by acquiring the identified land parcels to create a developable site for</p>		

comprehensive housing delivery. The Council will obtain outline planning approval and procure a partnership with a suitable private sector delivery organisation to deliver high quality housing and public realm. This partnership approach will allow the Council to retain significant control of the outcome whilst benefiting from the expertise and investment of a private developer.

The Council has very limited landholdings within the Phase 1 area and has since March 2021 been in dialogue/negotiations with landowners and occupiers to acquire the necessary land parcels by private treaty. However, following a review of progress, it has been concluded that it is now necessary to exercise the Council’s compulsory purchase powers. It is recognised that this will have an impact on landowners and occupiers. However, landowners and occupiers have been informed throughout the negotiation process that the Council is considering using its compulsory purchase powers and information about compulsory purchase has been shared with affected third parties.

The Phase 1 site aims to:

- Deliver up to 106 new high quality sustainable homes, both houses and apartments, with a range of unit sizes and with access to private and communal amenity space.
- Deliver private and affordable homes with a range of different affordable housing tenures.
- Remediate up to 2.18 hectares of brownfield land.
- Regenerate a large brownfield site, redeveloping former industrial buildings identified as derelict, unsafe, or unsuitable as well as making more efficient use of land.
- Deliver a well-connected development promoting the use of sustainable transport which will reduce the dependence on car travel.
- Deliver a new vibrant residential community adjacent to the town centre, which could also provide additional footfall into the town.
- Provide new public open space to promote wellbeing and complement existing facilities.
- Improve the streetscape and the public realm, enhancing the area and its appeal to current and future residents.
- Create local economic activity - jobs during construction and social value contributions.

<b>3 Who is the proposal likely to affect?</b>		
<b>People in Walsall</b>	<b>Yes / No</b>	<b>Detail</b>
<b>All</b>	<b>No</b>	The Phase 1 proposals will impact on the local community, whilst the proposed compulsory purchase order (CPO) will directly impact on landowners and occupiers within the intervention area.
<b>Specific group/s</b>	<b>Yes</b>	
<b>Council employees</b>	<b>No</b>	
<b>Other (identify)</b>		

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**Please provide service data relating to this proposal on your customer's protected characteristics.**

Background

The Willenhall Framework Plan seeks to promote housing growth in Willenhall.

The Council's vision for Willenhall is set out in the Framework Plan, this EqIA relates to Phase 1 of the Willenhall Framework Plan:

*Willenhall will grow into a vibrant, connected and welcoming town with a strong sense of place which celebrates its diverse communities and promotes safe, healthy and active lifestyles. Quality design and sustainable construction will move Willenhall towards a healthy, prosperous and sustainable future. Willenhall will:*

- *Provide a range of high quality, energy efficient, attractive new homes providing housing choice across a full affordability range.*
- *Provide access to opportunities for the people of Willenhall connected to the wider region through the new Willenhall train station.*
- *Maximise the benefit from the economic growth and investment across the West Midlands*
- *Create a healthy and high-quality living environment where residents are easily able to walk and cycle.*
- *Benefit from high quality, green and active public spaces and links which will better connect the Memorial Park to the town centre and the greenway to create an attractive environment for residents and visitors.*
- *A greener town which will enhance the opportunity for family play, safe social gathering and physical activity built around a series of linked character areas and public spaces.*
- *A healthy town with a range of schools, health care and community services*

In order to respond to local need the Framework Plan, working in partnership, will:

- Contribute to meeting unmet housing needs requirements.
- Captures the views of existing communities.
- Provide for an appropriate range of housing types, sizes and tenures to meet local need.
- Inclusion of family friendly environments, activities and facilities and provision for youth and elderly residents.
- Provision of wider community facilities and social infrastructure that supports communities.

Data

The percentage of population between the ages of 18 – 29 years within Willenhall North and South is significantly higher than both Walsall and England with this age group accounting for 36.4% of the population. This would suggest significant potential demand from individual, couples and young families for independent homes, largely within the First Time Buyer (FTB) marketplace, subject to affordability.

The percentage of the economically active who are employed in Willenhall North and South is c. 4% lower than in England. The number of residents self-employed is also

less than in Walsall and England. In addition, the level of unemployment within Willenhall North and South of 7.9% is higher than Walsall at 6.8% and significantly higher than the percentage in England at 4.4%. Of these, 3.9% are long term unemployed within Willenhall North and South.

In terms of dwelling type there is a predominance of semi-detached (38.3%) and terraced (27.5%) dwellings within Willenhall North and South. This compared with 42.1% and 22.3% semi-detached and terrace within Walsall and 30.7% and 24.5% respectively within England. Detached dwellings make up only 12.7% of dwellings within the area. 19% of dwellings are purpose-built apartments/maisonettes within the study are compared with 15.2% and 16.7% in Walsall and England respectively. This supports an average smaller dwelling types within Willenhall North and South compared with Walsall and England.

The percentage of home ownership at 54.4% within Willenhall North and South is lower than both Walsall and England which are consistent, reflecting 62.4% and 63.3% respectively. Of these a significantly higher percentage of 58.4% are owned with a mortgage, compared with Walsall at 31.1% and England at 32.8%.

The level of homes which are socially rented in Willenhall North and South is also higher at 26% when compared with Walsall at 24.1% and England at 17.7%. This does clearly suggest a greater need in the location for social housing and a reduced opportunity for owner occupation within the area.

The percentage of shared ownership in the area is higher at 1.1% when compared to Walsall at 0.6% and England at 0.8%, although this percentage is still a low proportion of the overall tenure make up.

*Data produced by the Office of National Statistics (ONS) detailing the socio-economic profile of the Willenhall 2011 Census North and South Super Output Areas (SOA).*

**5 Please provide details of all engagement and consultation undertaken for this proposal. (Please use a separate box for each engagement/consultation).**

To help inform the development of the Framework Plan, public engagement was undertaken under the theme of 'Love Willenhall', designed to find out what local residents, businesses and community representatives think about Willenhall today and how they would like to see Willenhall in the future. The engagement exercise began on 14th February and initially ran until 7th March, although this was subsequently extended by an additional week to 14th March 2021.

Key Findings from the engagement process are provided below.

At-a-glance findings:

- 170 responses to the online feedback form were received.
- Over 80% of respondents lived in Willenhall while around 30% worked in the town.

- When asked what things they loved about Willenhall, respondents frequently mentioned Willenhall Memorial Park, the local people and community spirit, and the town's history and heritage.
- When asked what things they would change about Willenhall, respondents frequently mentioned better and more diverse retail, restoration or redevelopment of derelict buildings, better public transport, and reduced crime levels.
- Willenhall town centre and Morrisons were the most frequently visited places by respondents, with over 60% travelling to each at least weekly before the pandemic.
- When asked for three words that would best describe a future Willenhall, respondents frequently mentioned words such as "cleaner", "busier", "vibrant", and "safer".

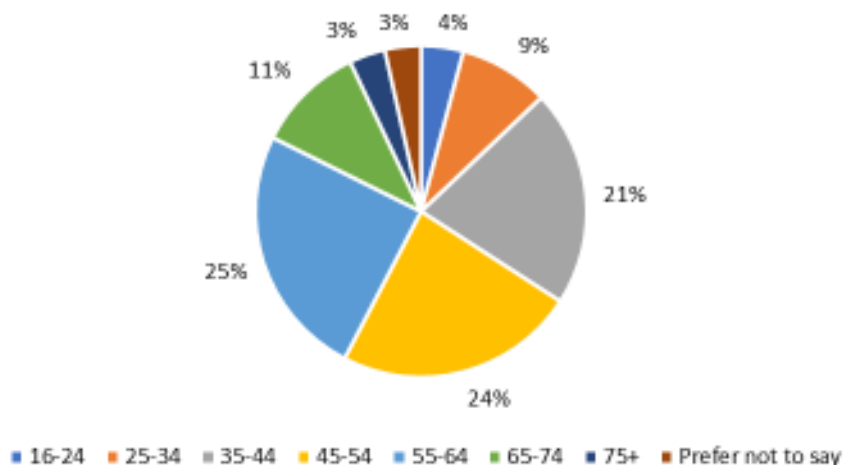
A breakdown of the characteristics of respondents in terms of their relationship with Willenhall is as follows:

- 84% of respondents stated they live in Willenhall
- 75% stated that they visit Willenhall for social, leisure or other reasons
- 31% stated that they work in Willenhall
- 15% stated that they operate or run a business / organisation in Willenhall
- 9% stated that they run a community, voluntary or charitable organisation in Willenhall
- 5% stated that they study or attend an educational setting in Willenhall

Demographic Profile of respondents:

- 70% of respondents were aged between 35-64.

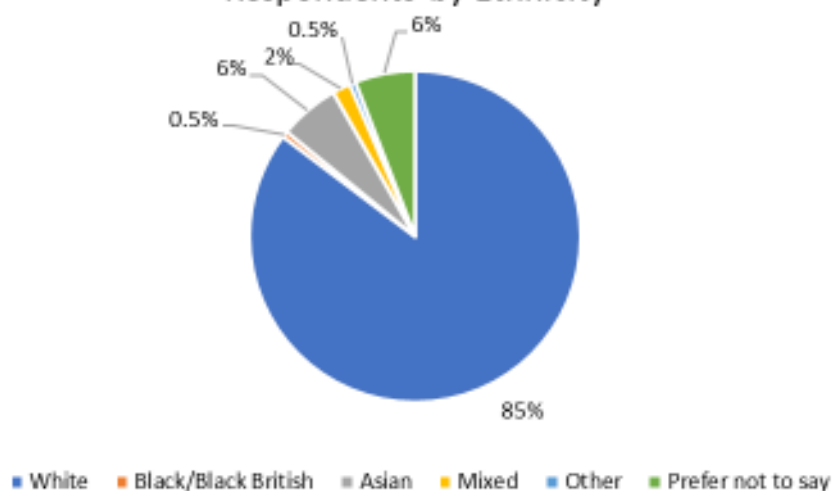
### Respondents by Age Group



- A higher proportion of respondents were female than male (53% and 45% respectively).
- Nearly a quarter of respondents (23%) stated that they had physical or mental health issues.
- The majority of respondents were from a white ethnic background (85%). The Ethnicity breakdown of the respondents was as follows:

White (85%)  
Black/Black British (0.5%)  
Asian (6%)  
Mixed (2%)  
Other (0.5%)  
Prefer not to say (6%)

### Respondents by Ethnicity



### Landowner and occupier negotiations to acquire third party land.

The Council's desire is to acquire all third- party land by agreement where possible. Property Consultants, Avison Young (AY), have been appointed to represent the Council in negotiations with all interested parties. Since the commencement of negotiations in March 2021 AY have continued to regularly communicate with interested parties, seeking to acquire their property by agreement and to also understand their business needs as appropriate. Negotiations are on-going and will continue alongside the making of any CPO. As CPO specialists, AY also seek to understand the individual needs and requirements of all interested parties. The Council recognises that it needs to be sensitive and considerate in its approach as compulsorily acquiring land and property can be stressful and could impact on the mental wellbeing of affected parties. The appointment of specialists to lead on these negotiations and to ensure that the affected parties have a direct point of contact is helpful in seeking to minimise stress on affected parties.

The Council has identified eight landowners within the Phase 1 site and to date is in negotiations with all but one of these landowners. It is understood that the seven landowners can secure vacant possession of their landholdings. Information and letters have also been sent to occupiers to ensure that all affected parties are aware of the scheme and forthcoming CPO.

The needs and requirements of individual landowners are being understood via the negotiations process and the Council is doing its best to meet such needs:

- The Council has and continues to be proactive in trying to understand individual needs and requirements and is therefore keeping under review its Frequently Asked Questions (FAQs) and Business Charter to ensure that it is providing the support that is required where this is possible.
- The details of key contacts are made available on communications issued to affected parties with face-to-face meetings offered.
- Information hosted on the Council's website is in an accessible format so that those who do not read print can access the details. Recent written communication is also following best practice by providing contact details should the information be required in large print or an alternative format (such as audio and easy to read). Examples include the FAQs and letters. To date no such requests have been made.
- A variety of communication methods are offered to ensure that the Council is tailoring its methodology to meet the requirements of the individuals: meeting in person and virtually, speaking on the phone and communicating via letters and emails.
- The Council's Employment (Sectors) Growth Manager is also a named contact and provides additional support to understand business needs and provide advice where this is possible.
- The Council has encouraged affected parties to appoint their own surveyors to



provide advice and guidance and offered to reimburse reasonable fees. Some of the landowners have as a result appointed a surveyor to represent them.

### Outline Planning Application

Public engagement was undertaken with local residents, businesses and community representatives to seek views on the proposals for Moat Street and Villiers Street prior to submission of the outline planning application. Exhibition material was available online from 28<sup>th</sup> November to 11<sup>th</sup> December 2022, with two face to face events held at the Willenhall CHART Community Hub. The exhibition was accompanied by a short questionnaire which enabled people to provide feedback on the proposals.

#### At-a-glance findings

- Overall, 22 respondents completed the questionnaire.
- The majority of respondents (82%) were local residents / members of the public. Four respondents were either representatives of local business or community organisations.
- Respondents were generally positive about the proposals, highlighting benefits associated with developing derelict sites and benefits associated with the provision of new housing.
- Other frequently mentioned comments related to parking, provision of green space and comments relating to the cemetery (for example appropriate design given location in proximity to the cemetery, and maintenance of the cemetery).

A breakdown of the characteristics of respondents in terms of their relationship with Willenhall is as follows:

- 18 respondents (82%) of respondents stated they are a resident/member of the public
- Two respondents (9%) stated that they operate or run a business/organisation
- Two respondents (9%) stated that they are responding on behalf of a community, voluntary or charitable organisation
- 19 respondents (86%) provided postcode information, the vast majority of which were from the local area, with 16 respondents were from WV12 and WV13 postcodes (which relate specifically to Willenhall), and the remainder being WS2 and WS8 postcodes, relating to areas slightly to the east of Willenhall.

#### Demographic Profile:

71% of respondents were aged between 35-74.

Other characteristics of respondents were as follows:

- The majority of respondents were from a white ethnic background (86%).

- A higher proportion of respondents were male than female (55% and 41% respectively).
- The majority of respondents (82%) stated that they had no physical or mental health issues.

At the time of writing The Local Planning Authority is undertaking statutory consultation as part of the planning process.

### Consultation Activity

<b>Type of engagement/consultation</b>	Survey	<b>Date</b>	14/2/21 to 7/3/21
<b>Who attended/participated?</b>	Members, general public, community and faith groups, voluntary organisations, businesses, local schools		
<b>Protected characteristics of participants</b>	Summary of the protected characteristic monitoring data: Age Gender Ethnicity Disability		

#### Feedback

When asked what things local people would change about Willenhall, respondents frequently mentioned better and more diverse retail, restoration or redevelopment of derelict buildings, better public transport, and reduced crime levels. Further details provided above.

<b>Type of engagement/consultation</b>	Owner/occupier discussions	<b>Date</b>	March 2021 onwards
<b>Who attended/participated?</b>	Phase 1 owner/occupiers		
<b>Protected characteristics of participants</b>	Age and race of landowners		
<b>Feedback</b>	The Council's advisors have and continue to engage with owners/occupiers within the Phase 1 area to discuss potential land acquisitions. This is part of a regular programme of engagement to progress delivery. Further details provided above.		

<b>Type of engagement/consultation</b>	Survey	<b>Date</b>	28 <sup>th</sup> November to 11 <sup>th</sup> December
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			r 2022
<b>Who attended/participated?</b>	General public/local residents, businesses and community representatives		
<b>Protected characteristics of participants</b>	Summary of the protected characteristic monitoring data: Age Gender Ethnicity Disability		
<b>Feedback</b>	Respondents were generally positive about the proposals, highlighting benefits associated with developing derelict sites and benefits associated with the provision of new housing. Further details provided above.		
<b>6</b>	<b>Concise overview of all evidence, engagement and consultation</b>		
	<p>The Council is seeking a CPO resolution from its Cabinet in July 2023. This EqlA has been prepared in advance of the Cabinet meeting to support the decision-making process and also any potential CPO Inquiry. The EqlA will be reviewed and updated throughout the development and delivery of the Phase 1 scheme.</p> <p>As outlined above, engagement activity has been undertaken to date to support the Willenhall Framework Plan and also the development of the Phase 1 scheme focusing particularly on the landowners and occupiers within the site boundary noting that the dialogue with landowners is ongoing. Wider community engagement was also completed prior to the submission of the outline planning application (for access and layout) to ensure support for the Phase 1 proposals.</p> <p>The Council is in the process of appointing a developer partner who will be responsible for the further development (reserved matters planning application) and delivery of the Phase 1 scheme. The action plan below references where the Council will brief and review the EqlA with the appointed developer partner.</p> <p>In terms of an overview of the engagement that has taken place to date, the general consensus indicates that there is broad support around the direction of the Willenhall Framework Plan from stakeholders. In relation to the Phase 1 scheme, the public engagement completed to seek views on the proposals was generally positive about the proposals, highlighting benefits associated with developing derelict sites and benefits associated with the provision of new housing.</p> <p>The landowner engagement is on-going with age and race the only protected characteristics that have been identified by the dialogue to date. It is important to note that (to date) no equalities issues have been raised during the negotiations.</p> <p>The engagement and evidence to date suggests that there is a neutral impact for people with protected characteristics.</p>		
<b>7</b>	<b>How may the proposal impact each protected characteristic or group? The impact may be positive, negative, neutral or not known. Give reasons</b>		

<b>and if action is needed.</b>			
<b>Characteristic</b>	<b>Impact Yes / No</b>	<b>Reason</b>	<b>Action needed Yes / No</b>
<b>Age</b>	Yes - neutral.	<p>The demographic make-up of the area suggests significant potential demand from individual, couples and young families for independent homes, largely within the First Time Buyer (FTB) marketplace. There will therefore be a positive impact.</p> <p>The landowner engagement to date has indicated that some of the landowners are/may be coming up to retirements age.</p>	<p>No</p> <p>Yes – landowner negotiations to continue to monitor any potential impact.</p>
<b>Disability</b>	No	The Framework Plan considers the opportunity to bring forward supported housing, but this will be considered further once the Council's Policy has been agreed. This will continue to be monitored during the lifetime of the Framework Plan.	No
<b>Gender reassignment</b>	No		
<b>Marriage and civil partnership</b>	Yes- positive.	The Framework Plan and Phase 1 support growth in family housing.	
<b>Pregnancy and maternity</b>	No		
<b>Race</b>	Yes – neutral/positive.	The vision for Willenhall detailed in the Framework Plan	

		includes that:  “Willenhall will grow into a vibrant, connected and welcoming town with a strong sense of place which celebrates its diverse communities and promotes safe, healthy and active lifestyles. ....”  The landowner engagement to date has indicated that some of the landowners are from a BAME background.	Yes – landowner negotiations to continue to monitor any potential impact
<b>Religion or belief</b>	Yes - positive.	The vision for Willenhall detailed in the Framework Plan includes that:  “Willenhall will grow into a vibrant, connected and welcoming town with a strong sense of place which celebrates its diverse communities and promotes safe, healthy and active lifestyles. ....”	
<b>Sex</b>	No		
<b>Sexual orientation</b>	Yes - positive	The vision for Willenhall detailed in the Framework Plan includes that:  “Willenhall will grow into a vibrant, connected and welcoming town with a strong sense of place which celebrates its diverse communities and promotes safe, healthy and active lifestyles. ....”	
<b>Armed Forces</b>	No		
<b>Care</b>	No		

	<b>responsibilities</b>			
	<b>Health, Social and economic inequalities</b>	Yes - positive	The Framework Plan provides the support to drive forward the regeneration of the area. As well as setting out the Council's aspiration to promote Willenhall as an area that is a sustainable place to live, work and spend leisure time it also contributes towards the Council's vision as outlined in the Council Plan (2022-2025): Inequalities are reduced and all potential is maximised. The delivery of new homes in particular will aim to diversify the type and tenure of homes available in the area so that the needs of the community can be met.	
	<b>Other (Give Detail)</b>			
	<b>Further information</b>	N/A		
<b>8</b>	<b>Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details.</b>			(Delete one) <b>Yes</b>
	Willenhall railway station - expected to open in 2024 which will see communities being far better connected to Birmingham, Wolverhampton and to opportunities across the wider region.			
	Walsall to Wolverhampton Housing Growth Corridor – this joint initiative between the Council, West Midlands Combined Authority, City of Wolverhampton and Homes England aims to bring forward an ambitious programme of housing growth with the potential to deliver 8000 residential units across the Corridor. The Corridor is anchored at either end by Walsall Town Centre and Wolverhampton City Centre.			
<b>9</b>	<b>Which justifiable action does the evidence, engagement and consultation feedback suggest you take?</b>			
	A	<b>No major change required</b>		

B	<b>Adjustments needed to remove barriers or to better promote equality</b> An ongoing action plan will continue to monitor impact on groups with a protected characteristic.
C	<b>Continue despite possible adverse impact</b>
D	<b>Stop and rethink your proposal</b>

### Action and monitoring plan

Action Date	Action	Responsibility	Outcome Date	Outcome
1) April 2021 onwards	Phase 1 - Dialogue and negotiations with landowners/occupiers to acquire land – to continue to seek to understand needs and requirements and provide support where this is possible.	Development Team	Spring 2024	Land acquisition with all interested parties compensated accordingly.  Identify any impact on protected characteristics and ensure negotiations strategy is robust.
2) December 2022	Public engagement to share proposals for an outline planning application and seek views	Development Team	March 2023 (outline planning application submission)	Ensure community support for the outline planning application and to address comments where possible.
3) January 2024	Council to brief developer partner (once appointed) on this EqIA so they are fully aware of the Equality Act duties.	Development Team/appointed developer	Winter 2026/27	Delivery of a sustainable and inclusive development

	<p>Developer and Council to review EqIA – identify and action any further requirements for engagement and EqIA to be updated accordingly. E.g. is there a need for further engagement with residents with protected characteristics (Equality Act 2010).</p>			
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<b>Update to EqIA</b>	
<b>Date</b>	<b>Detail</b>
	To be updated as Phase 1 progresses to delivery (indicative dates dependent on programme):
October 2023	To review and update EqIA post CPO objection period.
January 2024	To brief developer partner (following appointment) and review and update EqIA (if required).
February 2024	To review and updated EqIA pre-CPO Inquiry.
	Further updates at key milestones as Phase 1 progresses.

**Contact us**

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