

Truro and Kenwyn Neighbourhood Plan



Equality Assessment

July 2015

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1.0 Introduction to Equality Impact Assessment

The Equality Act 2010 (the Act) places a duty on all public authorities in the exercise of their functions to have regard to the need to eliminate discrimination, to advance equality of opportunity, and to foster good relations between persons who have a “protected characteristic” and those who do not.

1.1 Equality Impact Assessment

Equality Impact Assessment (EqIA) is the systematic analysis of a policy or policies, in order to identify the potential for an adverse impact on a particular group or community, in particularly those with a protected characteristic. It is a method of assessing and recording the likely differential and/or adverse impact of a policy on people from different groups so that if a policy results in unfairness or discrimination then changes to eliminate or lessen the impact be considered.

- “Protected characteristics” are defined in the Act as age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

This document presents the results of the assessment of the Truro & Kenwyn Neighbourhood Plan (TKNP) to ensure that Truro and Kenwyn Parish Councils are satisfying its statutory duties in this regard.

1.2 Aims of the Equality Analysis

The purpose of the analysis is to increase participation and inclusion, to change the culture of public decision making and to nurture a more proactive approach to the promotion of equality and fairness at the heart of public policy. The aim in conducting the analysis is the promotion of fairness and equality of opportunity and thus it is the outcomes that are of primary concern.

1.3 Methodology

An assessment has been made on whether the Truro and Kenwyn Neighbourhood Plan has a positive, negative or neutral impact on each of the protected characteristics (in so far as data is available). A brief justification of the policies and proposals in the Neighbourhood Plan, and notes of any mitigation, has been provided. If the impact is negative, this is given a high, medium or low assessment. It is important to rate the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High Impact	A significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.
Medium Impact	Some potential impact exists, some mitigating measures are in place, poor evidence
Low Impact	Almost no relevancy to the process, e.g. an area that is very much legislation-led.

1.4 Baseline Data

Data for Truro and Kenwyn is available for the following protected characteristics: Sex, age, disability, race and religious belief. Data is not readily available for the following protected characteristics: gender reassignment, pregnancy and maternity, and sexual orientation. Unless stated otherwise the data source is the 2011 Census.

In 2011 there were **24,566** people living in Truro & Kenwyn.

Sex	Neighbourhood Plan Area	England Total
Male	48%	49%
Female	52%	51%

Age	Neighbourhood Plan Area	England Total
0 – 15 Years	17%	19%
16 – 64 Years	64%	65%
Over 64 Years	19%	16%

Disability	Neighbourhood Plan Area	England Total
Day to day activities limited a little	9%	8%
Day to day activities limited a lot	10%	9%

Ethnicity/Race	Neighbourhood Plan Area	England Total
White British	94%	80%
Other White	3%	6%
Non-White	3%	14%

Religious Belief	Neighbourhood Plan Area	England Total
Christianity	59%	59%
Other	2%	9%
No Religion/Non Stated	39%	32%

In summary Truro and Kenwyn has:

- A slightly lower proportion of young and higher proportion of old people than the national average;
- A higher proportion of persons with incapacity or with limitations on their day-to-day activities than nationally;
- A higher proportion of white persons than the national average;
- A much lower proportion of people who practice religions other than Christianity than nationally.

2.0 Vision and Objectives of the Truro and Kenwyn Neighbourhood Plan

“Our vision is for Truro & Kenwyn to be a successful and vibrant place, where everyone has the opportunity to thrive economically, culturally and socially; a safe place, aware of its history and confident of its future; that promotes and achieves learning, innovation, activity, health and sustainable development. Truro & Kenwyn will be a diverse community that provides for and values all of its people, ensuring that developments benefit communities”

2.1 What the Plan aims to deliver:

- 1. Truro & Kenwyn to be vibrant, safe and pleasant places with adequate opportunities for work, fulfilment and enjoyment;*
- 2. Conserving and enhancing the landscape and green spaces of our area;*
- 3. A good mix of facilities, services and open spaces for local people;*
- 4. To encourage community cohesion;*
- 5. To try and make sure that people of all ages and backgrounds can find fulfilment, happiness and safety in their communities;*
- 6. The variety and quality of life in our communities to be good, not just for us, but for those who travel to work here and for those who visit us;*
- 7. Our settlements to blend carefully and accessibly into our rural surroundings;*
- 8. To play a full and dynamic part in tomorrow’s Cornwall — fostering the spirit of “onen hag oll” — one and all;*
- 9. Most of all, to engage young people in our community so that it attracts them to make their lives here.*

The overall vision agreed for the Plan is that *“Truro and Kenwyn will be a diverse community that provides for and values all of its people”*. This puts equality at the centre of the Plan for all residents. This aim of fostering an equal, socially inclusive and dynamic community is further echoed in the vision where it states *“where everyone has the opportunity to thrive, economically, culturally and socially”*.

In terms of what the Plan aims to deliver it focuses on *“community cohesion”* which again is central to the aspiration of the Plan. A further aim is *“To try and make sure that people of all ages and backgrounds can find fulfilment, happiness and safety in their communities”*. By making this general statement it is a recognition that the community will change over the period of the Plan and we aim to ensure that this is catered for in the Plan.

3.0 Truro and Kenwyn Neighbourhood Plan Policies equality assessment

Turning to the Policies of the Plan, below is an analysis highlighting where the Plan has specifically made reference to individual groups of the community.

Environmental Policies	Policy Impact on Groups With protected characteristics
<p><u>Policy E1 – Sustainable Development:</u> New development in Truro and Kenwyn will be approved where it can be demonstrated that the proposal is sustainable, embodying the social, economic and environmental aspects of sustainable development set out in the plan’s definition of sustainable development.</p>	<p>This follows the goal of equal provision for all protected characteristics.</p>
<p><u>Policy E2 – Sustainable drainage:</u> New developments will be permitted where they provide sustainable urban drainage and incorporate water recycling features that minimise the impact of development upon the drainage regime of the river catchment, in particular developments must: Maximise the use of Sustainable Urban Drainage technology within the site area with additional drainage discharged to the Strategic SUDs network; Minimise the amount of green space lost to hard surfacing; Decrease surface water run-off in the problem drainage catchments; Utilise green infrastructure provision where possible as part of SUDs design. to create multi-functional green space; In areas at risk of flooding, proposals must not increase flood risk; Provide for the future maintenance of the drainage features.</p>	<p>No impact</p>
<p><u>Policy E3 – Sewage facilities:</u> Development proposals will be permitted where adequate sewage treatment facilities are available or where suitable arrangements are made for their provision.</p>	<p>No impact</p>

Policy E4 – Building quality:

Applications for development will be expected to provide secure, high quality, energy efficient design and accessible layouts.

Developments will be permitted where:

They safeguard grade 2 and 3a agricultural land for food production;

It is demonstrated that the housing density proposed achieves a best use of land, whilst being of a massing and height appropriate to the character of its surroundings and maintaining an acceptable level of amenity in terms of garden space and accessible and usable open spaces;

Development integrates and strengthens existing neighbourhoods and builds a distinctive and cohesive place;

Developments provide infrastructure of a scale proportionate to meet the needs of new residents; They provide a layout that actively promotes energy conservation and incorporate sustainable forms of construction, energy conservation measures and where possible renewable energy technology;

They integrate sustainable transport modes (including bus services where the scale of development is appropriate) and active travel measures into the development;

High quality design and layout can be demonstrated that adds to the character of the area, meeting the Building for Life Standard

Where possible, reuse or redevelop existing buildings;

Achieve a minimum of Code 4 of the Code for Sustainable Homes, rising to zero carbon from 2016 (or equivalent standard).

Age and Disabled – Design standards require assessable layouts of property and developments ensure an acceptable level of amenity in terms of garden space and accessible and usable open space. This is particularly relevant to the young, the physically disabled and the elderly.

Development layout integrates and strengthens neighbourhoods assisting with cohesion and social interaction; ensuring all protected characteristics have an equal opportunity to integrate into the community.

Age – The provision of bus services is crucial, particularly to younger and elderly members of the community without alternative transport.

<p>Policy E5 – Green infrastructure: The Truro and Kenwyn Green Infrastructure Strategy sets out the priorities and the Open Space Strategy sets out the standards for green space and open space provision in the plan area. New development will be permitted where: A net increase in biodiversity is provided through the creation of new habitat and the retention of key habitat, trees and wildlife corridors; New open space provision prioritises opportunities for the provision of allotments or community growing schemes; Opportunities to connect to existing or new footpath links beyond the application site are maximised; Key areas of biodiversity and green space shown on the proposals map are preserved or enhanced or appropriately buffered by proposals and are not negatively impacted or reduced in size, scale or connectivity to wider networks of green infrastructure. A positive and viable management mechanism is developed and committed to, ensuring the continued provision and maintenance of the green infrastructure asset.</p>	<p>Age – A sufficient and high quality provision of open space is vital to all ages and is important to the Health and Wellbeing of the community. Policy applies equally to all members of the community.</p>
<p>Policy E6 – Character and setting of settlements: Developments must respect the special character and wider setting of the settlements of Truro, Threemilestone and Shortlanesend. Development will only be permitted where it provides a positive impact by means of its scale, height, materials or layout and does not result in the loss or significant impact upon: The Green foreground or background important to the character of the settlement; or The most typical views of the settlement from the surrounding countryside or from within the settlement; or A significant green gap between two or more settlements which are close to each other and in danger of losing their separate identity; The special qualities of the setting of the Area of Outstanding Natural Beauty.</p>	<p>No impact</p>

Policy E7 – Character of the Highways and byways:

Development affecting roads, streets, opes, lanes, bridges and pavements in the plan area should retain and enhance the character of the material and construction of the structure or surface making, where possible environmental improvements by retaining or reinstating historic paving and construction materials, sympathetic landscaping and planting, or removing unsightly elements such as hoardings; integrating road signs and markings as far as possible with the character of the space.

Alterations shall preserve or enhance the character of the Conservation Area. Outside of the conservation area, development should aim to retain or enhance appropriate surfacing or construction materials.

No impact

Economy and Jobs Policies	Policy Impact on Groups With protected characteristics
<p>Policy EJ1 – Communities at work: Applications for new employment development will be expected to improve employment opportunity and the quality of the employment environment in the Truro and Kenwyn area through the provision of good quality, accessible and environmentally sustainable schemes that meet the needs of our communities. Such developments will be permitted where they provide the following: increased opportunities and employment for local people; sustainable forms of construction, energy conservation measures and renewable energy; a high degree of permeability and access mobility within the development, and linking it well with local facilities such as convenience stores; provision for the on and off site highways, pedestrian and other access improvements which are needed to integrate the development well into the surrounding area and sustainable/active transport networks; Provision for parking appropriate to the needs of the development.</p>	<p>Age and Disability – Developments to ensure accessibility. Particularly relevant to elderly and disabled groups.</p>

Policy EJ2 – Truro city centre:

The proposals map shows the town centre boundary, primary shopping area and primary shopping frontages of Truro. Development proposals in the city centre will be permitted where they contribute to the realisation of EJ1 and provide:

A well-balanced mix of uses, including residential; High quality design and construction which integrates well with Truro’s distinctive and historic character including its setting, distinctive buildings, and green infrastructure as well as the quality of the public realm.

Particular sites identified and safeguarded for mixed use development at Pydar Street, Moorfield car park and the former bus depot are included on the proposals map.

To support the continued vitality and viability of the city centre, development will be supported that reuses buildings or sites for residential use, including live/work accommodation and ‘living over the shop’.

Proposals for change of use or redevelopment of ground floor accommodation in the primary shopping area will only be permitted where the proposal would add to the attractiveness of the centre and would not reduce the predominance of A1 use.

Development proposals for retail or city centre uses outside of the town centre boundary defined on the proposals map will need to be subject to sequential testing to demonstrate why the proposed use cannot be accommodated in the city centre and that they would not negatively impact on the trading and operation of the city centre.

No impact

<p>Policy EJ3 – The Port of Truro: In the port area shown on the proposals map, permission will be granted for the development of the port and marine related industry or uses where the proposal would address the requirements of EJ1 and:</p> <ul style="list-style-type: none"> Contribute to an improved layout and provision of additional facilities for the port; Contribute to the development of the maritime sector in Truro; Be compatible with adjoining uses; Preserve or enhance green infrastructure links found within the area. 	<p>No impact</p>
<p>Policy EJ4 – Newham Employment Area: Permission will be granted for the redevelopment of the Newham employment area for B1 (offices) and high quality employment space where the proposal would contribute to meeting the requirements of EJ1 and:</p> <ul style="list-style-type: none"> Contribute through improved layout, design of building, density of use and landscaping to the site and its surroundings; Maintain or increase the employment density of the site; Be compatible with adjoining uses; Help strengthen links to Truro centre and contribute to the realisation of road improvements at ‘Little Newham’; Preserve or enhance green infrastructure links such as the Newham trail, hedgerow and trees found within the area. Not lead to the sterilisation of the waterfront for marine related industry in the future. Small scale extensions to the employment area will be permitted where the proposal would: <ul style="list-style-type: none"> Represent a natural rounding off of the existing area; Be of a scale, design and layout that would not adversely impact on the landscape setting of the estate; Not sterilise the Heritage Quarry as shown on the proposals map; Improve the layout, functioning and appearance of the Newham employment area. 	<p>No impact</p>

<p>Policy EJ5 – Treliske Employment Area: Permission will be granted within the area shown on the proposals map for the provision of employment uses, primarily grow on space related to the Health and Well-being Innovation Centre at Treliske, where the proposal would address the requirements of EJ1 and achieve high quality design and layout of buildings, spaces and landscaping.</p>	<p>No impact</p>
<p>Policy EJ6 –Threemilestone Employment Area: Permission will be granted for the redevelopment of spaces within the existing employment area and expansion to the estate where it addresses the requirements of EJ1 and: It would provide a good quality of design and layout of buildings and spaces; Any extension would represent a planned approach to infrastructure, accessibility and strategic landscaping, taking account of current topography and landscape features</p>	<p>No impact</p>
<p>Policy EJ7 – Employment land Safeguarding: The strategic employment areas shown on the proposals map at Treliske, Threemilestone, Port of Truro and Newham will be safeguarded for employment uses (B1, B2, B8). The cattle market will be retained for agricultural purposes.</p>	<p>No impact</p>

Education Policies	Policy Impact on Groups With protected characteristics
<p>Policy ED1 – School site allocation: Proposals for non-educational uses on land shown on the proposals map as protected for school use or for the provision of new schools or extensions will only be permitted where: The proposed development is necessary for the purpose of education or leisure and will not result in the loss of sports pitches or facilities in accordance with policy LC3. or The land is declared surplus to educational requirements; and The proposed development cannot be reasonably accommodated on alternative land.</p>	<p>Age – This policy ensures that the provision of land designated for educational use is protected thus protecting the provision of education for future younger members of the community.</p>

Housing Policies	Policy Impact on Groups With protected characteristics
<p>Policy H1 – Meeting Local Housing Need: Applications for new housing development must help meet local housing need in the Truro and Kenwyn area through the provision of good quality, accessible and environmentally sustainable schemes that meet the needs of our communities.</p> <p>Developments will only be permitted where they:</p> <ul style="list-style-type: none"> Are well integrated by means of scale, location and character with the urban areas of Truro, Threemilestone or Shortlanesend; Prioritise the redevelopment of previously developed land within the urban areas of Truro, Threemilestone or Shortlanesend; and Provide a mix of housing in accordance with local needs/demand; <p>All developments must:</p> <ul style="list-style-type: none"> Provide a minimum of 40% affordable housing (or 50% on public sector land), phased to be provided alongside the market housing; Incorporate 5% of self-build or custom build to allow communities to build their own homes, where this would be viable; Retain and enhance existing habitat and important green space within the site; Not add to flood risk or result in the loss of flood storage capacity; and Make a positive contribution to the built environment in terms of scale, materials and bulk. <p>Where on site provision of affordable housing is not possible, make a financial contribution to off-site provision that is equivalent in value to on-site provision.</p> <p>Development comprising the redevelopment of open spaces or garden areas will not normally be permitted, unless it can be demonstrated that their loss would not result in visual or recreational detriment to the location or that sufficient space would be retained to mitigate their loss.</p>	<p>Age – In order to ensure sufficient housing supply for the community.</p>

Policy H2 – Care Facilities:

Development of extra care homes to meet the demand of the local older households will be permitted where they:

Are located in a location accessible by good quality, frequent public transport links; and
Prioritise where possible the use of previously developed land within the urban areas of Truro, Threemilestone or Shortlanesend.
provide capacity for community beds; and
Retain and enhance existing habitat and important green space within the site.

Age – During the development of the Plan it was identified that there is a need for an increased supply of high quality provision of elder care facilities. The Plan has worked with a major supplier of residential and domiciliary care in the Plan area, Cornwall Care Ltd, to ensure that this criteria based policy will aid delivery of new and high quality facilities.

Leisure and Culture Policies	Policy Impact on Groups With protected characteristics
<p><u>Policy LC1 – Open space requirements:</u> Development will only be approved where provision is made for the open space needs of the development, consisting of 82.32 square metres per dwelling, made up of appropriate typologies. Play areas and sports facilities should be designed to be easily accessible by sustainable and active travel modes. Where there is access to alternative facilities, or the scale of the development will not allow for on-site provision, contributions to the development or ongoing maintenance and management of alternative facilities may be required.</p>	<p>Applies equally to all protected characteristics.</p>
<p><u>Policy LC2 – Local Protected open space:</u> The Proposals Map identifies open spaces that make a significant contribution to public amenity by virtue of their landscape character, appearance and/or function. Development proposals located within these open spaces will only be permitted where: The development is for the replacement or extension of an existing building currently set in open space or for a new building which supports a recreational or sports use and where the proposal does not detract from the open character of the area, maintains or enhances visual amenity, and does not prejudice the established function of the area; or supports a recreational or sports use and where the proposal does not detract from the open character of the area, maintains or enhances visual amenity, and does not prejudice the established function of the area; or Development is necessary for the continuation or enhancement of established uses for recreation, leisure or nature conservation which would result in community benefits and where the proposal maintains the open character of the area, and maintains or enhances visual amenity; or Development is minor in nature and includes the provision of an appropriate equivalent or improved replacement facility in the locality, of at least quantitative and qualitative equal value to compensate for the open space loss, and it can be demonstrated that the character and appearance of the area to be lost is not critical to the setting of the area.</p>	<p>Applies equally to all protected characteristics.</p>

<p><u>Policy LC3 – Protection of formal open spaces and playing pitches:</u></p> <p>Land that provides important formal or informal recreational space or sports pitch facilities for the plan area are shown on the Proposals Map. Permission will only be granted for development that results in the loss of this space in exceptional circumstances where:</p> <p>Sport and recreational facilities can best be retained and enhanced to at least equivalent community benefit or playing standard through the redevelopment of part of the site; or Alternative provision of at least equivalent community benefit and playing and facilities standard is made available in an appropriate location that is well related to the community to which it relates and designed to be easily accessible by sustainable and active travel modes.</p>	<p>Applies equally to all protected characteristics.</p>
<p><u>Policy LC4 – Cultural and community centres, services and facilities:</u></p> <p>The quality and opportunity for accessing cultural and community centres, services and facilities in the plan area should be enhanced by improvements to existing facilities and appropriate new provision where it is required. Development of new or improved community, cultural and cultural interpretation facilities in sustainable locations will be supported.</p> <p>The loss of cultural and community centres, services and facilities will not be permitted unless appropriate replacement facilities can be provided of equivalent or improved value and in a location that would provide appropriate access for the community that the facility serves.</p>	<p>Ensures communities continue to provide access to amenities for all protected characteristics.</p>

Transport Policies	Policy Impact on Groups With protected characteristics
<p>Policy T1 – Transport Strategy Contributions: The Truro Sustainable Transport Strategy (shown on the inset map) identifies a package of measures to reduce congestion and increase capacity in the transport network in the plan area. Proposals for development in the plan area will be required to provide contributions to the delivery of this package alongside measures within proposals to increase the use of non-car based modes of transport, particularly for shorter journeys in the urban area in accordance with the policies of this plan.</p>	Applies equally for all protected characteristics
<p>Policy T2 – Safeguarding railway land: Land at Truro railway station and the former Cattle Dock (as shown on the proposals map) will be safeguarded for future rail related usage. Non-rail related development will not be permitted on these sites unless it can be proven that the land will not be required for future rail usage.</p>	No impact
<p>Policy T3 – Sustainable transport: Development will be permitted where: The site or proposal is well served by public transport, walking and cycling routes or has deliverable potential to be (and this can be secured for future implementation); The movement hierarchy of the proposal maximises opportunities within and adjoining the development to prioritise non-car based modes of transport, including walking, cycling and public transport; Where the scale of development allows, public transport routes should be incorporated into or enhanced to provide accessible bus stop infrastructure within 400m walking distance of dwellings or employment uses; Connections are made to cycle and walking routes beyond the site wherever possible. The Green Infrastructure Strategy shows potential and existing strategic and important cycle and walking routes for Truro and Kenwyn. Development in the plan area should contribute to the development of the new routes and the protection and enhancement of existing routes, including the development of linkages to them wherever possible.</p>	Ensures all protected characteristics have access to public transport.

Historic Environment Policies	Policy Impact on Groups With protected characteristics
<p><u>Policy C1 – Character and setting of the Truro Conservation Area:</u> Development in the Conservation Area will only be permitted where it respects, preserves and enhances the special character and wider setting of the Conservation Area in terms of: The scale, height, form, detail, materials, colour and massing of the proposal; The relationship between the proposal and listed buildings and structures and non-designated assets; Preservation and enhancement of open spaces and spaces between buildings. Development that affects the setting of a conservation area must preserve or enhance the setting and character of and views into, and out of, historic and conservation areas including views of listed buildings and structures and significant open spaces.</p>	No impact
<p><u>Policy C2 – Preservation of the Historic Leats:</u> Development proposals must retain and respect the integrity of the unique and historic Leats system in Truro and prevent damage or detriment to their appearance or operation. Development should ensure that the system remains uncovered and operational. Where appropriate, developments should restore defunct parts of the leats system. Development in the rural Allen and Kenwyn Valleys must preserve and enhance the course and integrity of the leat systems present in those areas. Proposals for the reconstruction of the leats in these areas will be supported.</p>	No impact
<p><u>Policy C3 – Boundaries:</u> Development should seek to preserve or enhance walls, hedges railings and other boundary structures and treatments and heritage assets (including milestones) that contribute to the appearance of the streetscape or special character of the Plan area. In the Conservation Area proposals should not result in the loss of walls and boundaries of traditional character and appearance. Proposed new boundary treatments and enclosures must respect the quality and composition of existing boundaries.</p>	No impact

<p><u>Policy C4 – Demolition in the Conservation Area:</u> Development involving the demolition of the whole or part of an existing building within the Truro Conservation Area will only be permitted where:</p> <p>The alternative development preserves or enhances the character or appearance of the conservation area; and The building or feature makes no positive contribution towards the character or appearance of the Conservation Area; or The condition of the building or feature and the cost of repair and maintenance renders it impracticable to retain when assessed in comparison with its importance and the value derived from its continued use; and There is clear and convincing evidence that all reasonable efforts have been made to sustain existing uses or to find viable new uses and these efforts have failed.</p> <p>Consents to the demolition of a building within the Conservation Area will be conditioned to ensure that demolition does not take place before a contract has been let for redevelopment of the site.</p>	<p>No impact</p>
<p><u>Policy C5 – Shop fronts and Signs:</u> Proposals for the development of new, or the refurbishment of existing shop frontages and other commercial premises within the Conservation Area will be permitted where the proposed alteration or replacement is sympathetic to and respects the architectural integrity of the building and the character of the area with special regard to such matters as scale, pattern of frontages, vertical or horizontal emphasis, materials, colour and detailed design. New signs will only be permitted where they respect the architectural integrity and features of the buildings and the character of the locality.</p>	<p>No impact</p>

4.0 Conclusion

In conclusion, an assessment of the policies contained within the Truro and Kenwyn Neighbourhood Plan shows that none of the policies will have any negative impacts upon groups with protected characteristics. Many of the policies contained within the Plan seek to cater for the needs of people with protected characteristics in the Plan area. The Truro and Kenwyn Neighbourhood Plan's vision, objectives and policies all aim to foster community cohesion and social inclusion.

The Truro and Kenwyn Neighbourhood Plan provides a vision for the area, with a range of policies, which will result in positive benefits for many parts of the of the community with protected characteristics, particularly with the provision of open space to assist with Health and Wellbeing, and the enhancement of social and community facilities, aiming to build community cohesion and resilience.

The Plan has identified a particular need in provision of accommodation and facilities for elderly people and has worked with a care provider to both understand the issue and to provide a policy to assist with development to provide a solution.