

# Hastings Local Plan The Hastings Planning Strategy Equalities Impact Assessment

September 2012

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## **Executive Summary**

This document is the Equalities Impact Assessment (EqIA) of the Hastings Borough Council Planning Strategy. This EqIA was undertaken in conformity with the Equalities Act 2010 to ensure consistency in what is necessary to make our services and the workplace a fair environment and to comply with legislation.

Data show that the population of Hastings is ageing with significant growth projected in the 65-74 and over 75 age groups by 2028. This suggests there may be future concern around health, mobility and living conditions of the town's population and policies in the Planning Strategy have the opportunity to address these by providing improved transport links, more sustainable transport, having amenities such as shops located close to areas of housing and in improving the condition of existing and new build housing.

The town also suffers with low employment levels and high economic inactivity rates compared to East Sussex and the South East. There is the opportunity here for policies in the Planning Strategy to address this by ensuring employment space/land is available in the right place and for the right types of business to allow and attract employers to the town. Policies focused on transport improvements and environmental enhancements too will contribute towards encouraging businesses to the town.

The assessment identified that all the policies within the Planning Strategy would have either a positive or neutral/negligible impact on the different equalities groups and as no adverse impacts were identified it is not considered necessary to produce a specific action plan. It is considered that through the assessment, the policies within the Planning Strategy will benefit the wider community as a whole.

Whilst the assessment has not highlighted a need to develop measures to mitigate against any adverse impacts that a policy may have, the Council will monitor the implementation and impact of policies through the Annual Monitoring Report, and address any issues which may occur.

## 1.0 Introduction

- 1.1 This report details the results of the Equality Impact Assessment (EqIA) of the Proposed Submission version of Hastings Planning Strategy, which is a draft Planning Strategy for the town up to 2028. The EqIA is a way of helping to identify the likely or actual effects of policies on people in respect of their age, race, disability, gender, sexual orientation, religion or belief. The aim of the assessment is to make sure that as far as possible, any negative consequences for minority groups are eliminated or minimised, and opportunities for promoting equality are maximised.
- 1.2 Public authorities are specifically required to undertake an EqIA under The Equality Act 2010. The Act ensures consistency in what is necessary to make our services and the workplace a fair environment and to comply with legislation. The Equality Act covers issues such as age, disability, marriage and civil partnership, gender reassignment, race, sex, sexual orientation, religion and belief and pregnancy and maternity. These issues are now called 'protected characteristics'.
- 1.3 This report begins with an overview of the purpose of the EqIA, detailing the Council's aspirations and the statutory obligation to conduct an EqIA under the Equalities Act 2010. Following this a summary of the methods employed to conduct the assessment is set out as well as a list of plans and programmes relevant to the assessment.
- 1.4 The report then provides some baseline data regarding the social and economic characteristics of Hastings in order to place the assessment in context. This leads into the identification of issues and opportunities within the town.
- 1.5 Following this, the Planning Strategy is outlined in terms of what it is; the stages that have been completed in its development; what has been done so far and an assessment of each policy in terms of its potential or real impacts on any of the identified protected groups.
- 1.6 The report ends with a section on what can be concluded from the assessment and any recommendations for action to be taken further to ensure equalities are being met and adhered to.
- 1.7 This final Equalities Impact Assessment will be published alongside the Planning Strategy for the submission stage.

## **2.0 Purpose of this report**

- 2.1 The purpose of this EqIA is to ensure that the policies and objectives in the Planning Strategy address equalities. This proactive approach meets the aspirations of the Council's Equalities Agenda and its statutory obligations under the Equality Act 2010.
- 2.2 The Government's Equality Act was introduced on 1<sup>st</sup> October 2010 and its aims are to:
- Protect people's rights and encourage equal opportunity
  - Update, simplify and improve the previous legislation
  - To be a simple and accessible framework of discrimination law
- 2.3 Under the Act, people are not allowed to discriminate, harass or victimise anyone because of the following 'protected characteristics':
- Age
  - Disability
  - Gender reassignment
  - Marriage and civil partnership
  - Pregnancy and maternity
  - Race
  - Religion and belief
  - Sex
  - Sexual orientation
- 2.4 The Government decided not to take forward the socio-economic duty on Public Bodies (November 2010), but the Hastings Local Strategic Partnership (LSP) agreed this should be included in the Charter. The Equality Act includes a Public Sector Equality Duty. This says we must show 'due regard' to:
- eliminating discrimination, harassment and victimisation
  - advancing equality of opportunity
  - fostering good relations between people who share a protected characteristic
  - fostering good relations between people who have a protected characteristic and those who don't

## **3.0 Methodology**

- 3.1 The EqIA ensures that equalities issues are addressed in the development of the Planning Strategy and in the policies themselves. This report highlights the equality and diversity considerations by analysing the demographics of the town and using equalities monitoring information captured at earlier stages of the Local Development Framework process.
- 3.2 For the purpose of this EqIA, target groups have been identified as follows:

- Women;
- Black, Asian and ethnic minority people including traveller communities;
- Young and older people;
- Disabled people;
- Lesbian people, gay people, bisexual people and transgender groups (LGB&T); and
- People of different religion/belief groups.
- People in socio-economic exclusion

3.3 These target groups are defined by the Equality Act (2010), and are identified because they have either been historically discriminated against, are vulnerable and/or people who are considered at risk of social and economic exclusion within society.

3.4 The EqIA methodology followed three key stages:

- Desk-based analysis of baseline material through a quick screening tool;
- Evaluation of different key issues and opportunities facing equality strands within the town; and
- Recommendations for the development of the Planning Strategy and the EqIA approach.

3.5 This EqIA has been prepared by officers in the Planning Policy team who are responsible for the Planning Strategy's preparation. Advice was sought from the Councils Head of Policy, Performance and Sustainability as to how to approach the process as well as contacting the Councils Community Cohesion Officer for his perspective. The EqIA was also sent to several other officers within the Council who were considered to have specialist knowledge.

3.6 The EqIA was reviewed by the Councils Directorate Heads of Service Management Team (DMT) on 14<sup>th</sup> December 2011 and minor changes requested. This final EqIA, with amendments, was signed off at DMT on 25<sup>th</sup> October 2012.

## **4.0 Identifying relevant plans and programme**

4.1 Table 1 below details the national legislation and local documentation which informs this EqIA.

Table 1: Summary of Equalities Documents

Plan, Policy or Programme	Main aims of document	How can this be addressed?
Equalities Act 2010	Requires equal treatment in access to employment as well as private and public services, regardless of the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation	The process of preparing the Planning Strategy and the policies within is considered in light of the Act, as part of this EqIA.
Hastings Borough Council - Corporate Plan	<p>Key Objectives are:</p> <ol style="list-style-type: none"> <li>1. To continue to do everything we can to promote economic growth, employment and economic inclusion in partnership with others and through leading work on the growth of the cultural economy</li> <li>2. Improve the quality of life of local people by working closely with partners to make the town safe and clean.</li> <li>3. Making sure we're efficient, customer-focused and a good organisation to work for.</li> <li>4. Promoting equality and an inclusive, supportive community and narrowing the gap – bringing the quality of life of people in the most deprived parts of Hastings and St Leonard's up to those of the rest of the town, and the town up to county and national averages.</li> <li>5. Tackling climate change and making Hastings more environmentally sustainable</li> </ol>	<p>The Planning Strategy addresses these priorities as follows:</p> <ol style="list-style-type: none"> <li>1. Ensuring that sufficient land is identified for employment purposes to allow for future growth in jobs and to encourage business investment by providing choice in the types of employment premises and their locations. The Planning Strategy also has an important role in supporting the skills, cultural development and education agenda within the town.</li> <li>2. Promoting good design through the Planning Strategy will incorporate features that will reduce crime and design out crime. The Planning Strategy as a whole has the improvement of people's quality of life through the strategic planning of the town as a key priority and outcome.</li> <li>3. Not really applicable to the Planning Strategy's purpose</li> <li>4. Through the promotion and management of change in a sustainable way so that communities become places where people want to live, work and visit.</li> <li>5. By requiring developers to follow the hierarchical approach in achieving the energy and carbon reduction targets required by the building regulations. Further, the Strategy will require all development to be designed to incorporate suitable climate change mitigation and adaptation measures such as</li> </ol>

	<p>6. Establishing a culture of openness and transparency about everything the Council does, enabling local people to hold us to account</p>	<p>green roofs and walls, SuDS, multi-functional green space, waste reduction &amp; recycling and flood risk management.</p> <p>6. The Planning Strategy progresses through extensive consultation with the local community and other stakeholders so that local people can see what we are trying to achieve and how and can challenge us openly if needs be.</p>
<p>Hastings Borough Council – Single Equalities Scheme</p>	<p>The Councils Single Equality Scheme, adopted March 2010, aims to ensure that there are equal life chances for all in the town; to ensure that access to services, democracy and employment is available to all, and acknowledges that the barriers people face may be different for different groups.</p>	<p>The Planning Strategy looks to address these issues at a strategic level so that further plans, i.e. the Development Management Plan and any neighbourhood plans, can be informed by it and that these plans ensure equality for all.</p>
<p>Hastings Borough Council Statement of Community Involvement</p>	<p>Sets standards for engagement, and identifies how all stakeholders will be engaged in the planning process, including those that are considered ‘hard to reach’</p>	<p>The Planning Strategy has been prepared in accordance with the guidelines set in the updated Statement of Community Involvement</p>

## 5.0 Baseline information

- 5.1 In order to understand the likely impacts for Hastings Council in the development of the Planning Strategy there needs to be an understanding of the demographics of the Borough and of the stakeholders that will be affected (i.e. residents, businesses, and visitors, commuters to and from the town).
- 5.2 This section aims to provide background and context to the rest of the assessment. It summarises the key social and economic characteristics of Hastings, including the main issues and opportunities affecting the Borough.

### Demographic structure

- 5.3 ONS data shows that Hastings has an estimated population of 87,171 with a higher proportion of females (44,864) than males (42,307). 63% of the population are of working age and this is broadly in line with regional and national figures (see Table 2). Of the working age population, 66.5% are employed.

**Table 2: Working age population (2010)**

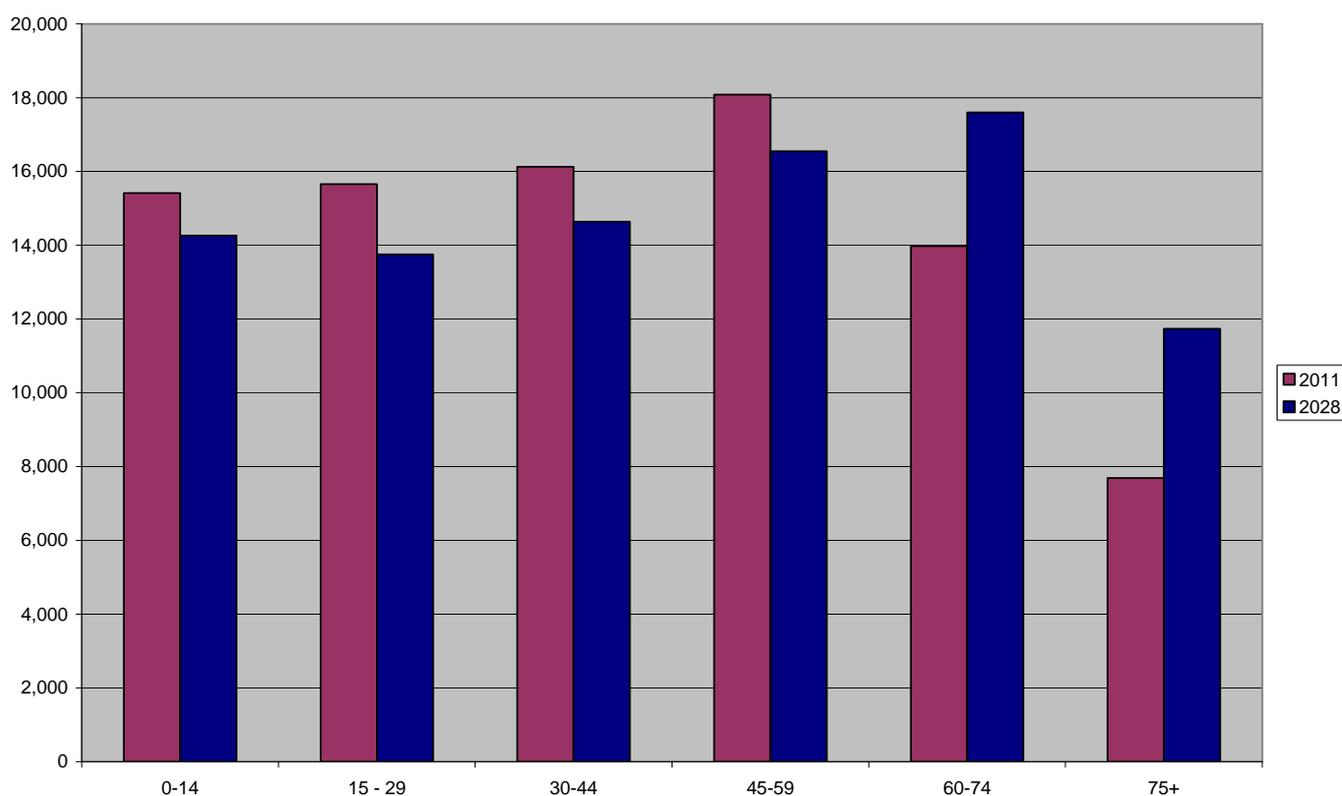
	Hastings (numbers)	Hastings (%)	South East (%)	Great Britain (%)
All people aged 16-64	55,000	63.1	63.9	64.8
Males aged 16-64	26,900	63.6	64.8	65.8
Females aged 16-64	28,100	62.5	63.0	63.8

**Source: ONS mid-year estimates**

**Note: % is a proportion of total population**

- 5.4 The make up of the population in regards to age structure is important to note as it can indicate what services and facilities may be needed by the population in the future, for example a higher proportion of older people may mean greater provision of accessible services. The age structure is shown in Figure 1.
- 5.5 Figure 1 shows that the largest age group is the 18-64 (working age), however the age groups which show most growth are the 65-74's; 75-84's and 85+. All other age groups are set to decline by 2028. These trends mirror those of East Sussex, although the increase in the 65-74 age group is less pronounced than in Hastings.

**Figure 1: Population estimates by age structure 2011 and 2028**



**Source: East Sussex County Council, 2010 Policy Based Population Projections**

5.6 In terms of ethnicity, data in Table 3 show that Hastings is predominantly White with 94% of the population coming under this category in 2006. This is comparable with the make up for the South East (92.6%) and England (88.7%). The next largest group is Black/Black British with 1.8% of the population in the Borough. However it is clear from the data that the proportion of White ethnic population has declined since 2001 in Hastings, with all other ethnic groups increasing, most notably Asian and Black ethnic groups. This trend is mirrored within the region and England.

**Table 3: Population by ethnic group in 2006- based on NHS registrations**

Ethnic Group	Hastings (%)		South East (%)		England (%)	
	2001	2006	2001	2006	2001	2006
White	97.0	94.0	95.1	92.6	91.0	88.7
Mixed	1.3	1.6	1.1	1.4	1.4	1.6
Asian	0.7	1.7	2.3	3.3	4.6	5.5
Black	0.5	1.8	0.7	1.4	2.3	2.8
Chinese/Other	0.5	0.9	0.8	1.3	0.8	1.4

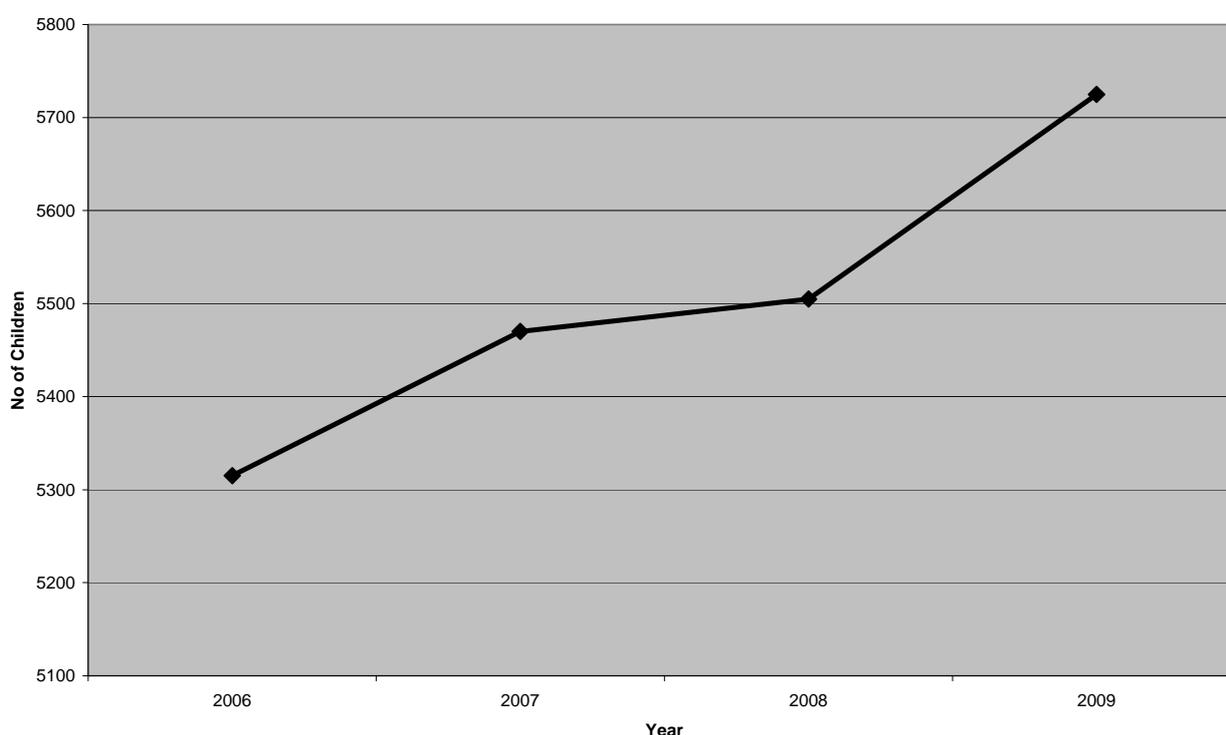
**Source: PCT 2008**

5.7 In 2010, the Office of National Statistics (ONS) produced data showing the country of birth of UK residents. In Hastings 96.5% (82,000 people) of residents were born in the UK compared with 94.1% in 2009 and 89.3% in 2008. Again this figure is close to that for East Sussex and is comparable with other towns along the East Sussex coast in 2010 for example Eastbourne (93.6%); Rother (94.3%) and Lewes (93.7%).

## Deprivation and Education

- 5.8 Hastings is one of the most deprived Local Authority areas in England (19<sup>th</sup> most deprived out of a total of 326). Deprivation is widespread and this is reflected in the fact that of the 53 Super Output Areas in Hastings, 15 of these neighbourhoods fall within the worst 10% in England and a further 9 rank in the worst 20% (Index of Multiple Deprivation, 2010). Furthermore, 12 of the town's 16 wards contain one or more of these neighbourhoods.
- 5.9 As Figure 2 shows, the number of children living in poverty in the town increased sharply between 2008-2009. Just over 5,700 children were categorised as such in 2009 (East Sussex in Figures, Children living in poverty, 2006-2009).

**Figure 2: Children Living in Poverty in Hastings 2006-2009**



- 5.10 In terms of educational attainment and skills Hastings is improving with 28.4% of the working age population achieving NVQ4<sup>1</sup> and above in 2010, an increase of 4% on 2009 figures. The figures for achieving NVQ2<sup>2</sup>-NVQ3<sup>3</sup> have both improved since 2009, with just over 65% of the working age population achieving NVQ2 and 43.9% achieving NVQ3. However, the percentage of people achieving less than 5 GCSE's at A-C grades has increased to 84.7%, which is a concern.
- 5.11 The ethnicity of school pupils in Hastings in 2010/11 is shown in Table 4 below. It is clear that the vast majority of pupils are of White ethnic origin, with the next highest group being mixed ethnicity. This mirrors the figures for East

<sup>1</sup> HND, Degree and Higher Degree level qualifications or equivalent

<sup>2</sup> 5 or more GCSEs at grades A-C, intermediate GNVQ, NVQ 2, intermediate 2 national qualification (Scotland) or equivalent

<sup>3</sup> 2 or more A levels, advanced GNVQ, NVQ 3, 2 or more higher or advanced higher national qualifications (Scotland) or equivalent

Sussex schools as a whole (East Sussex in Figures, School pupils by broad ethnic group 2010/11).

- 5.12 The percentage of school children without English as a first language is slightly higher in Hastings than in East Sussex as a whole (Table 5), reflecting the diversity within the borough amongst the younger age groups.

**Table 4: Ethnicity of School Pupils 2010/11**

<b>Ethnicity</b>	<b>Hastings %</b>	<b>East Sussex %</b>
White	88.8%	92.2%
Asian	2.0%	1.5%
Black	1.3%	0.6%
Chinese	0.3%	0.3%
Mixed	4.5%	3.5%
Other	0.5%	0.4%
Not Known	2.5%	1.6%

Source: East Sussex in Figures

**Table 5: School Pupils without English as a first language 2010/11**

<b>First Language</b>	<b>Hastings</b>	<b>Hastings %</b>	<b>East Sussex</b>	<b>East Sussex %</b>
English as a first language	11,519	94.7	58,424	95
Another language as a first language	593	4.9	2,508	4.1
Not Known	56	0.5	538	0.9

Source: East Sussex in Figures

## Health

- 5.13 Data for 2007-2009 show that whilst life expectancy in Hastings has increased since 2003-2005, males in Hastings can still expect to live 2.8 years less than the average male in the South East and 1.5 years less than the average male nationally. Females in Hastings can expect to live 2.5 years less than the average female in the South East and 1.4 years less than the average female nationally.
- 5.14 In health and well being terms 74.7% of Hastings residents rated their health to be 'Very Good' or 'Good' in 2008/09 (East Sussex in Figures, Health and Wellbeing, 2008/09. This is a self reported statistic from the resident survey carried out in 2008/09.

## Labour

- 5.15 Hastings has an employment activity rate of 74.9% which is well below the South East figure of 81.3%. Between April 2010 and March 2011 there were 36,300 people in employment within Hastings and 4,600 unemployed (East Sussex in Figures, Economically active and inactive population, 2004-2011). In relation to economic inactivity, for the same period (April 2010 – March 2011), Hastings is well above the South East (20.7%) and East Sussex (21.8%) figures, standing at 25.1%.

- 5.16 Hastings has 13,700 economically inactive people, with 8,900 stating they do not want a job<sup>4</sup>. This inactivity rate may be influenced by factors in addition to the labour market such as a lower skilled workforce, fewer business start ups and a lower job density.
- 5.17 Related to employment/unemployment is the level of support allowance and benefits claimants within the town. The Jobseeker's Allowance (JSA) is payable to people under pensionable age who are available for, and actively seeking, work of at least 40 hours a week. The JSA claimant count at September 2011 showed that the percentage of unemployed people in Hastings stands at 5.7%, which is significantly higher than in the South East (2.6%) and the national figure (3.9%)<sup>5</sup>.
- 5.18 In February 2011, 7% of the town's population were claiming Disability Living Allowance<sup>6</sup>. This is the highest figure within the East Sussex towns and is significantly higher than the county average (4.8%); South East average (3.8%) and national average (5.4%). This further highlights the town's deprivation status with a higher proportion of persons claiming benefits.
- 5.19 Also in February 2011, Hastings had an Employment and Support Allowance<sup>7</sup> claimant rate of 10.6. This again was significantly higher than County, Regional and national rates.

## 6.0 Issues and Opportunities

### What does the baseline information show?

- 6.1 Hastings cannot stand still due to the fact that as well as facing the reality of an increasingly aging population, other issues are significant:
- The proportion of our residents who have ethnic minority backgrounds is low but has increased in recent years and will continue to do so. This will be driven by new economic opportunities, education facilities and this is likely to provide an influx of economically active and skilled people.
  - There are indications that the gay, lesbian, bisexual and transgender community increasingly see Hastings as an attractive environment in which to live and work.
  - The town is physically challenging for many with physical disabilities who can be enabled to offer more to the social and economic life of the community and gain new opportunity.
  - We need to attract and retain young people to the town and to improve educational attainment.

<sup>4</sup> East Sussex in Figures, Economically active and inactive population, 2004-2011

<sup>5</sup> %s are for those persons aged 16-64

<sup>6</sup> Disability Living Allowance (DLA) provides a non-contributory, non means-tested and tax-free contribution towards the disability-related extra costs of severely disabled people who claim help with those costs before the age of 65. It replaced and extended Attendance Allowance and Mobility Allowance for people in this age group from April 1992.

<sup>7</sup> Employment and Support Allowance (ESA) was introduced on 27th October 2008. It replaced Incapacity Benefit and Income Support, paid because of an illness or disability, for new claimants only. Employment and Support Allowance is a benefit for people who cannot work because of illness or disability. It involves a new medical assessment called the Work Capability Assessment which assesses what claimants can do and identifies the health-related support they might need

- 6.2 The Council welcomes and encourages diversity and believes it is beneficial in creating an economy and community which is resilient and responsive to a diverse and mobile world. Our planning policies must provide the homes and economic opportunities that a less homogenous population will have.
- 6.3 From the contextual information presented in the previous section it is clear that Hastings faces many social and economic issues primarily the level of employment, deprivation, benefit claimants and educational attainment.
- 6.4 Low employment levels and high economic inactivity rates may be related to, amongst other factors, a lower skilled workforce and fewer business start ups. There is the opportunity here for policies in the Spatial Strategy to address this issue by ensuring employment space/land is available in the right place and for the right types of business to allow and attract employers to the town. Policies focused on transport improvements and environmental enhancements too will contribute towards encouraging businesses to the town.
- 6.5 Provision of jobs could also help with reducing the level of Job Seekers Allowance claimants in the town and help people get back into work.
- 6.6 Population forecasts for Hastings show that in the ages 0-14; 15-29; 30-44 and 45-64 there will be a general decrease in population whereas the age groups 65-74 and 75+ show significant growth between 2008; 2016 and 2026. Between 2011-2026 the 0-14 age group will decline by 1.4%; 15-29 age group by 2.2%; 30-44 age group by 2.5% and 45-64 age group by 0.5%. In the 65-74 age group forecasts show an increase of 2.5% over the same period and in the over 75's there will be an increase of 4.1% (East Sussex in Figures).
- 6.7 This has implications for health, mobility and living conditions. Policies in the Spatial Strategy have the opportunity to address these issues in providing improved transport links, more sustainable transport, having amenities such as shops located close to areas of housing and in improving the condition of existing and new build housing.
- 6.8 The Spatial Strategy seeks to improve the socio-economic status of the town and will provide an overarching strategic framework for development which will feed into other more specific documents and policies.

## **7.0 The Planning Strategy**

### **What is the Planning Strategy?**

- 7.1 The Planning Strategy provides for the long term delivery of regeneration and sustainable growth in the town up until 2028. It is not concerned with individual development sites or specific details. Its purpose is to set an overall framework for the future of the town. It will:
- Set out the vision for the future sustainable development and regeneration of the town up to 2028.
  - Identify the key issues to be addressed through the planning system and sets out generally how we intend to deliver new housing, jobs and

infrastructure and also contains policies for protecting our most important green spaces and historic townscapes.

- Set out how we'll accommodate future levels of housing, employment and retail growth up to 2028.
- Set guidelines for the pattern of land uses around the town.
- Form the context for other planning policy documents that will be prepared in the future
- Clearly show how planning policies and the use of land will support the key targets in the Community Strategy.
- Join up planning and land issues with plans and proposals affecting health, equalities, community safety, housing, regeneration, community development, employment, education, transport and the environment set out in the Hastings & St Leonards Sustainable Community Strategy.

7.2 Delivery of policies will be monitored annually through the Annual Monitoring Report (AMR) which is available at [http://www.hastings.gov.uk/environment\\_planning/planning/local\\_development\\_framework/ldf\\_documents/#amrs](http://www.hastings.gov.uk/environment_planning/planning/local_development_framework/ldf_documents/#amrs)

### **What stage are we at?**

7.3 There have been several stages in preparing the Planning Strategy:

- Early engagement;
- Issues and Options;
- Preferred Approaches; and
- Informal Consultation on significant changes

7.4 The process of producing the Planning Strategy began in July and August 2005 when several informal consultation events took place including workshops, questionnaires and presentations. Over 200 people from Hastings contributed their comments at this stage.

7.5 Following this early engagement, the Issues and Options consultation ran from October to December 2006 with briefings being held for local groups and interested parties and representations being encouraged via written or electronic means. There were 158 responses received to the consultation which were used to feed into the next stage of production.

7.6 The Preferred Approaches consultation ran from May to July 2008. Contact was made with everyone on the Local Plan database, key members of Council staff, Councillors and statutory bodies. Exhibitions were also held at various locations around the town to reach as many people as possible and these were advertised through posters in the town, in newspapers and magazines and the Councils internal newsletter. A total of 1,015 people attended the exhibitions and many comments and representations were received which will feed into the final Draft Proposed Submission Planning Strategy.

- 7.7 The Council carried out an additional informal consultation between 27<sup>th</sup> June 2011 and 8<sup>th</sup> August 2011 as there had been changes within the planning system since the Preferred Approaches consultation in 2008.
- 7.8 The Planning Strategy has been rolled on by 2 years (up to 2028 instead of 2026) and the Government required Councils to identify enough sites and broad locations for development to deliver housing for at least 15 years from the date of plan adoption.
- 7.9 The Consultation sought views on 3 main areas of change; how many new homes; significant policy changes and the overall Planning Strategy.
- 7.10 The final stage of the Planning Strategy preparation involved publishing the proposed submission version under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>8</sup>. The consultation took place under Regulation 18 of the 2012 Regulations.
- 7.11 All the work carried out for the stages involved in preparing the Planning Strategy is detailed in the Consultation Report which can be read at [http://www.hastings.gov.uk/environment\\_planning/planning/localplan/consultation/previous\\_consultations/](http://www.hastings.gov.uk/environment_planning/planning/localplan/consultation/previous_consultations/)

### **How has the issue of Equalities been addressed?**

- 7.12 Throughout the production of the Planning Strategy we have sought to ensure that all of the local community and interested parties were able to take part. A list of consultees has been maintained by the planning policy team to ensure that interested parties are kept informed of the progress on plan making.
- 7.13 For the Issues and Options consultation different letters were sent to the different groups to ensure a relevant letter was sent to all, advising that the document was available and that they could download or request it. The documents were distributed in the week commencing Monday 23 October 2006, to ensure that consultees had the document for the start of the consultation period. The documents were also made available on the Internet at [http://www.hastings.gov.uk/environment\\_planning/planning/localplan/](http://www.hastings.gov.uk/environment_planning/planning/localplan/), with a link to both the front page and the consultation section.
- 7.14 For the Preferred Approaches consultation, all those listed on the consultation database were invited to make representations including those who responded to the Issues and Options consultation.
- 7.15 Mail shots were sent to those on the consultation database, and Newsletters were sent shortly before, inviting people to advise of any changes to their contact details before the consultation got underway.
- 7.16 Exhibitions were held at various locations around the town to advertise the consultation to as wide a number of local people as possible. The exhibitions

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<sup>8</sup> In essence Regulation 19 states that a local authority, prior to submitting a local plan to the Secretary of State, must make available, at the appropriate places, all proposed submission documents and a statement of the representations procedure and ensure each of the general and specific consultation bodies is made aware that the documents are available for them to make representations on.

were advertised in local magazines with leaflets and posters displayed at various locations and at the exhibition venues. The exhibition venues were also checked to ensure they all had access for persons with disabilities. The exhibitions and numbers of people who attended were as follows:

- Sainsbury's = 351
- Gensing & Central St Leonards Forum = 35
- West St Leonards Community & Social Club = 11
- All Saints Church Hall = 27
- The Bridge Community Centre = 40
- 4 Courts Community Centre = 9
- Priory Meadow Shopping Centre = 542

7.17 The informal consultation again involved inviting all those on the consultation database to make representations along with key members of Council staff and Councillors. Extensive advertising, mailing and Facebook and Twitter blogs were used to reach as many people as possible. Access to the consultation pages was also made available to the public through the computer in planning reception at Aquila House. All the documents also clearly stated that they could be made available, if requested, in large print, audio, Braille and in different languages.

7.18 All of the reports for each stage of the Planning Strategy consultation, together with the Final Consultation Report, can be read on the website at [http://www.hastings.gov.uk/environment\\_planning/planning/localplan/consultation/previous\\_consultations/](http://www.hastings.gov.uk/environment_planning/planning/localplan/consultation/previous_consultations/).

## **8.0 EqIA Screening Process**

8.1 The purpose of the screening process is to see if the Planning Strategy presents any issues for any group of people. The screening process determines whether or not it is necessary to carry out a full Equality Impact Assessment for this area of work, with the main question being considered whether the Planning Strategy has the potential to cause any adverse impact or discrimination against different groups in the community

8.2 The Planning Strategy is the principal document within the Councils Local Plan. The Planning Strategy sets the overall vision and strategic objectives for the District to 2028 and its long-term development. It contains a number of core policies which aim to deliver the vision and strategic objectives and it also sets out the broad quantum and locations for development. All subsequent planning policy documents should follow the principles set within the Planning Strategy.

8.3 The screening exercise was based on considering the following:

- When the Plan would result in a negative impact:
  - Could it potentially discriminate unlawfully against any group (High)
  - Could any group be denied fair and equal treatment (High)
  - Have there been any concerns or complaints expressed about the Plan (or similar items elsewhere) having a negative impact

8.4 There may also be a positive impact; this gives a 'Low' in the ratings if:

- It could actively promote good relations between different groups
- It could promote equality of opportunity

8.5 The results of the screening are shown in Table 6 below. From this exercise it is clear that the main issues facing Hastings and on which the Planning Strategy as a whole may have an impact (negative or positive) are social and economic exclusion, disability and race. This reflects the trends highlighted in the baseline information in Section 5.

**Table 6: Initial Screening**

<b>Group</b>	<b>Likelihood of negative effect</b>	<b>Impact of one negative effect</b>	<b>Overall assessment rating</b>	<b>Describe potential and actual impacts (show your thought process). Especially if you have given a High rating.</b>
<b>Disability</b>	Low	Medium	Medium	The Planning Strategy itself does not contain any policies which could discriminate on the grounds of disability. However, in terms of plan preparation, an issue such as ensuring access to consultation venues and documents is a key area which has the potential to present a problem. To date there have been no reports of this type of impact actually happening during the consultation process.
<b>Gender</b>	Low	Low	Low	The policies within the Planning Strategy are not gender specific.
<b>Sexual Orientation</b>	Low	Low	Low	As with gender the policies in the Planning Strategy are not specific to either straight, lesbian, gay, bisexual or transgender groups.
<b>Race</b>	Medium	Medium	Medium	The Planning Strategy will include criteria against which applications for site(s) for Gypsy and Travelling show people within the town will be judged. This policy seeks to provide clear guidance about the circumstances in which proposals for new sites will be supported and eliminates discrimination against travelling communities.
<b>Religion/ belief</b>	Low	Low	Low	The policies within the Planning Strategy are not religion or belief specific.
<b>Age</b>	Low	Low	Low	The policies within the Planning Strategy are not age specific however the commitment towards providing lifetime homes will have an overall positive effect as it will ensure homes are easily adaptable for the changing life stages of the population.
<b>Social and economic exclusion</b>	Low	Medium	Medium	The idea of the Planning Strategy is to ensure that social and economic inclusion is promoted and achieved, bringing the more deprived areas up to the standards of other areas of the town and Hastings as a whole up to the standard of the South East. The creation of jobs and employment may result in jobs which require higher skill levels than those which some of the local population possess and so they may be excluded from gaining employment here. The Strategy, however, looks to support education and training within the town to raise the skills base which may offset this impact. In terms of social exclusion there is likely to be little or no negative impact as the Strategy looks to enhance the cohesion and vitality of local communities through the provision of a mix of compatible and flexible uses, services and communities.
<b>Transgender</b>	Low	Low	Low	See comments under 'gender' and 'sexual orientation' above
<b>Other</b>	Low	Low	Low	N/A

## 9.0 Assessment of impacts – Planning Strategy policies

- 9.1 The Planning Strategy contains the strategic vision and objectives for the Borough up to 2028. The policies contained within the Planning Strategy aim to deliver the strategic vision and objectives. The policies contained within the Planning Strategy will be assessed as part of the EqIA.
- 9.2 Table 7 (below) makes an assessment of the impact of the individual policies contained within the Planning Strategy on the identified equality groups. The table contains a short summary of each policy, an assessment of the impact of the policy on each equality group, along with a summary of whether there is any potential impact by the policy on the equality groups.
- 9.3 The key below identifies the symbols used to summarise the impact on an equality group for each Planning Strategy policy.

Symbol	Likely Impact
+	Positive
o	Neutral/Negligible
-	Negative
N/A	Not Applicable

**Table 7: Assessment of Planning Strategy Policy Impacts on Equalities Groups**

Policy	Equalities Group								Commentary
	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	
<b>Policy DS1: New Housing Development</b> – sets the target for housing development in the town up to 2028 as well as making a commitment to bringing empty homes back into use.	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group.
<b>Policy DS2: Employment Growth</b> – Sets the target for development of employment floorspace between 2008 – 2028 and how this will be achieved.	o	o	o	o	o	o	+/-	o	Whilst the aim of this policy is to encourage growth in employment opportunities and premises, the jobs created may require higher skills than the local population possesses, excluding them from employment. On the other hand, job creation may enable more local people to stay and work within the town, instead of commuting.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy DS3: Location of Retail Development</b> – identifies broad areas where retail development will take place. More detailed site identification coming forward in the Development Management Plan.	o	o	o	o	o	o	+	o	New retail development will be concentrated in Hastings and St Leonards town centres which are accessible by public transport and have good parking facilities. This may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes).
<b>Policy FA1: Strategic Policy for Western Area</b> – sets minimum development targets for employment and housing, whilst protecting and enhancing greenspace.	o	o	o	o	o	o	+	o	Whilst not having an impact on any individual equalities groups, the inclusion of delivering the strategic network of cycle routes will benefit the Borough as a whole. Area policies seek to build on employment offer, contributing positively to economic exclusion.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy FA2: Strategic Policy for Central Area–</b> Developments and improvements in the town centre form the focus for change. Focus on regeneration will continue in terms of housing mix and tenure. Support Central St Leonards & Silverhill District Centres and Bohemia local shopping area	+	o	o	o	o	+	+	o	Protecting the local and district centres should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes). Improving the economic performance and delivering regeneration will have positive impact on social/economic exclusion.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy FA3: Strategy for Hastings Town Centre</b> – this policy looks to provide significant employment and retail floorspace within the Town Centre whilst protecting its distinctiveness, improving the public realm and promoting accessibility by transport modes other than the car.	+	o	o	o	o	+	+	o	<p>The policy contains elements concerned with promoting accessibility to the town centre through public transport, for people with disabilities, walking and cycling which should positively benefit all the community and those with disabilities and who may not have access to a car (older people, young people, those on low incomes) in particular. Provision is also made to improve the public realm and to cater for increasing numbers of students which may lead to benefits in terms of improved safety for women and young people. Improving the economic performance of the town centre will positively impact on social/economic exclusion</p>

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy FA4: Strategy for Central St Leonards</b> - this policy seeks to support development at key sites within the area whilst encouraging the growth of small businesses through the retention, development and conversion of properties. Improving housing conditions and maintaining the areas role as a district shopping centre are also promoted.	+	o	o	o	o	+	+	o	<p>The focus on encouraging small businesses to the area and maintaining the area as a district shopping centre should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes). Improvement in housing conditions may also benefit those on low incomes currently living in poor quality housing in the area.</p>

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy FA5: Strategic Policy for Eastern Area</b> -promotes the protection and enhancement of the areas important built and natural environment whilst maintaining Ore Village and the Old Town as a district and local centre. The focus is also on continued regeneration of the former Millennium Communities site at Broomgrove & Ore Valley.	+	o	o	o	o	o	+	o	By protecting the local and district centres should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes). Continued regeneration and focus on local and district centres will help boost economic performance and positively impact on social/economic exclusion.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy FA6: Strategic Policy for The Seafront</b> – supports implementation of key projects and proposals in the seafront strategy including encouraging new visitor accommodation; implementing the strategic network of cycle routes and support for proposals to bring the White Rock Baths back into use.	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group. However it has been acknowledged that the shared cycle route at the eastern end of the seafront may impact upon disabled persons and the elderly and so this will need to be kept under review to ensure no adverse impact is experienced.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy SC1: Overall strategy for managing change in a sustainable way</b> – growth and change will be managed to meet sustainability objectives, avoid vulnerability to climate change impacts, support diverse community needs and provide safe, healthy and vibrant places to live and work.	+	+	+	+	+	+	+	+	Managing change to avoid climate change vulnerability will impact positively on those within the social/economic exclusion group as it is this group that can be disproportionately affected (cannot afford measures to climate proof their homes/businesses). Providing safe and vibrant environs will be positive overall.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy SC2: Design and Access Statements –</b> Requires planning applications to demonstrate the evolution of the design prior to submission, how it meets the criteria of Policy SC1.	+	o	+	+	o	+	o	+	Reducing crime and the fear of crime, including hate crime, through design will have a positive impact on several target groups. Designing access improvements will positively impact those with disabilities.
<b>Policy SC3: Promoting Sustainable and Green Design–</b> all development must be designed to address climate change and enable a low carbon future	o	o	o	o	o	+	+	o	The promoting of new developments which contribute to a low carbon future and address climate change could decrease heating and servicing costs in the home and help people adapt to a changing climate. This will benefit households with low incomes and older people as these groups are more likely to suffer from fuel poverty and heat stress.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy SC4: Working Towards Zero Carbon Development</b> – sets out the energy hierarchy which developers are required to follow to achieve the energy and carbon dioxide emission requirements of the Building Regulations.	o	o	o	o	o	+	+	o	The promoting of new developments which contribute to a low carbon future could decrease heating and servicing costs in the home. This will benefit households with low incomes and older people as these groups are more likely to suffer from fuel poverty
<b>Policy SC5: District Heating Networks and Combined Heat and Power Systems -</b> opportunities will be explored at the Conquest Hospital,	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
Summerfield's Sports Centre and Town Centre.									
<b>Policy SC6:Renewable Energy Developments</b> – sets out criteria by which proposals for renewable energy development will be supported by the Council.	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group
<b>Policy SC7: Flood Risk -</b> development in areas that avoid flood risk and developments which do not increase flood risk elsewhere will be	+	o	o	o	o	+	+	o	Reducing the impacts of climate change and the resultant risks to the community would benefit all groups. Older people, young people and those on low incomes are considered to be disproportionately affected by the impacts of climate change and so it is highly

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
supported. A risk based sequential approach will be adopted by the Council in determining the suitability of land for development									likely that these groups in particular will benefit from policies relating to flood risk and other climate change impacts.
<b>Policy EN1: Built and Historic Environment</b> – development proposal will be expected to positively contribute to the character of the built and historic environment. Protection, enhancement, preservation	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group, however, some historic buildings may not be accessible for those with disabilities and their protection may make it difficult to implement such measures. This will be kept under review to ensure no adverse impact occurs.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy EN2: Green Infrastructure Network</b> – to establish and protect a green network of open spaces and nature conservation in recognition of their multifunctional role	+	o	o	o	o	o	+	o	Ensuring access to natural open space for everyone will improve health as well as fostering community activity. This will particularly impact positively on those within the social/economic exclusion group and those with disabilities as it is these groups that can be disproportionately affected by a lack of access to natural open space
<b>Policy EN3: Nature Conservation and improvement of biodiversity</b> – will give the town's biodiversity and geological resources protection	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy EN4: Conservation and Enhancement of Landscape</b> – will give protection to the town's distinctive natural landscapes and the coastline. Regard shall also be had to the High Weald AONB Management Plan 2004.	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group.
<b>Policy EN5: Open Spaces enhancement, provision and protection</b> – support the implementation of the Parks and Open Spaces Strategy 2006	o	o	o	o	o	+	+	o	Whilst it is not anticipated that this policy will impact on any specific group, overall the enhancement of open spaces may lead to improved health for the local community and better access for all. Play areas and access to open space will impact positively on the social/economic exclusion and age equalities groups

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy H1: Housing Density</b> – sets the expected minimum densities for housing developments of 30dph and on more sustainable sites 40dph. Different densities may be accepted in exceptional circumstances	+	o	o	o	o	+	+	o	Achieving higher housing densities where possible will encourage sustainable development with links to public transport, services and facilities. This should benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes).
<b>Policy H2: Housing Mix</b> - outlines the need for a mix of housing on sites and across the Borough as a whole. A proportion of houses are to be provided to Lifetime Homes	+	o	o	o	o	+	+	o	Creating mixed, balanced and sustainable communities will help with the integration of different equality groups. Provision of smaller dwellings will help those on low incomes, as well as young and older people. The provision of family dwellings will help young families remain in sustainable locations. The provision of

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
Standards. Account should also be taken of the existing local household characteristics and whether there is a bias towards younger or older household, families or sharers when considering a proposed development.									housing to Lifetime Homes standards will also benefit people with disabilities
<b>Policy H3: Provision of Affordable Housing</b> – sets out the level of provision of affordable housing on Brownfield and Greenfield sites	+	o	o	o	o	+	+	o	Additional affordable housing will benefit households with low incomes and may also bring benefits to those with disabilities, along with older and younger people, as these groups tend to have a higher housing need. There is a recognised shortfall of this type of housing in Hastings and evidence suggests that demand is set to grow.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy H4: Houses in multiple occupation</b> – sets out the criteria by which changes of use to HMO's will not be permitted	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group.
<b>Policy H5: Accommodation for Travelling Communities</b> – sets out the criteria by which proposals for these sites will be supported.	o	o	o	+	o	o	o	o	Gypsies and Travellers are a recognised minority group and therefore this policy will benefit this equality group. However, the policy provides assessment criteria against which planning applications for pitches will be considered, it does not provide for new pitches.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy E1: Existing employment land and premises</b> – seeks to retain land and premises currently (or last) in employment, permitting intensification, conversion, redevelopment and/or extension of employment land or premises, and facilitating access/enviro nmental improvements. Viability issues are considered	+	o	o	o	o	+	+	o	Providing a suitable and readily available supply of business land and premises will help provide additional job opportunities. Locating employment development in the most accessible locations may particularly benefit those households without access to a car (Young people, Older People, those on low incomes).

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy E2: Skills and Access to Jobs</b> – this policy seeks to require measures from major employment generating developments to promote access to the jobs it creates amongst those residents of Hastings who can have difficulty entering or returning to work.	+	o	o	o	o	+	+	o	It is considered that this policy will benefit those currently out of work but seeking employment as well as encouraging others to seek employment. Provision of jobs within the town will benefit those with disabilities, young and older persons and those on low incomes, who can find it difficult to enter or re-enter employment.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy E3: Town, District and Local Centres –</b> sets out the hierarchy of town, district and local centres with proposals for town centre uses within the town and district centres. Local centres will be protected and enhanced.	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy E4: Tourism and Visitors</b> – a more sustainable tourism offer will be sought with a longer season. Existing attractions will be protected and upgraded. Priority areas for visitor accommodation retention are identified and change of use will be resisted. New language schools will be encouraged where appropriate and existing schools protected.	o	o	o	+	o	o	+	o	<p>The encouragement of new language schools will increase the offer to those wishing to visit and study in Hastings from other countries and hence will have a positive impact on race promoting integration and interaction with the local community. Tourism also provides many entry level employment opportunities which will benefit young and older persons and those on low incomes, who can find it difficult to enter or re-enter employment.</p>

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy C11: Infrastructure and Development Contributions</b> – outlines the production of an Infrastructure Delivery Plan for the town and the circumstances in which contributions will be sought from development.	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group.
<b>Policy C12: Sports and Leisure facilities</b> – Major sports and leisure facilities should be centrally located and accessible to all.	+	o	o	o	o	+	+	o	Protecting the existing stock of playing fields and sports pitches is important to maintain the health and well being of local people, and is likely to benefit most people with disabilities, young and older persons and those on low incomes who may not have access at present.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy CI3: Children's play provision</b> – developers will be required to provide play space that is safe and allows for informal play. Contributions will be sought to improve existing play space but new play space will be required if there is none within 600m or 15-20min walking distance.	o	o	o	o	o	+	+	o	Providing safe and informal play spaces will allow children of different ages, socio- economic status and gender to interact with each other promoting social cohesion and a sense of community.
<b>Policy T1: Strategic Road and Rail Schemes</b> – lists the schemes which Council seeks early implantation of.	o	o	o	o	o	o	+	o	Increasing the accessibility to the town will contribute positively to overall economic objectives.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy T2: Local Road Improvements</b> – details the areas of land required for highway improvements that the Council will safeguard.	o	o	o	o	o	o	o	o	It is not anticipated that this policy will impact on any specific group
<b>Policy T3: Sustainable Transport</b> – details that the Council will work with the County Council using the Local Transport Plan 3 policy framework to achieve a more sustainable transport future for Hastings. Lists the areas of particular priority.	+	o	o	o	o	+	+	o	The provision of increased sustainable transport options will benefit those with disabilities, older and younger people, and those on low incomes, particularly where they do not have access to a car.

	Equalities Group								
Policy	Disability	Gender	Sexual Orientation	Race	Religion/ Belief	Age	Social/economic exclusion	Transgender	Commentary
<b>Policy T4: Travel Plans -</b> Major developments and those generating significant amounts of traffic will need to be located in areas that are accessible to a range of sustainable travel options in order to reduce car dependency. Developments will be required to produce a travel plan, which provide a framework for the development and delivery of targeted travel information and initiatives.	+	o	o	o	o	+	+	o	The provision of increased sustainable transport options will benefit those with disabilities, older and younger people, and those on low incomes, particularly where they do not have access to a car.

## **10.0 Publication and Review**

- 10.1 The EqIA will be published alongside of the Planning Strategy once the consultation on the Proposed Submission Planning Strategy has been completed and the planning document submitted to the Secretary of State for examination.

## **11.0 Conclusion and Recommendations**

- 11.1 This EqIA has examined whether the Planning Strategy and associated consultations have an adverse impact on, or have discriminated against, different groups within the community.
- 11.2 The assessment identified that all policies within the Proposed Submission Planning Strategy are likely to have either a positive or neutral/negligible impact on different equality groups. Further, the consultation events have followed the Council's Single Equalities Scheme and Statement of Community Involvement with equalities forms having been returned, analysed and stored as well as measures being taken to ensure access for all and inclusive advertisement of the events and documentation.
- 11.3 There is no identified adverse impact on the equalities groups and the policies within the document will benefit the wider community as well. The justification for the policies can be found within the Council's evidence base and the consultations undertaken through the stages of Planning Strategy production.
- 11.4 Based on the assessments made in this EqIA, it is not considered that any measures are required to mitigate against any adverse impacts that any policy may have. However, the Council will monitor the implementation and impact of the Planning Strategy policies through the production of the Annual Monitoring Report (AMR) and address any issues which may occur. The Planning Strategy sets out the monitoring framework which should provide a robust basis for future monitoring.
- 11.5 As the EqIA has not identified any adverse impacts on equalities groups it is not considered necessary to produce a specific action plan

