

Ipswich Local Plan – Equality Impact Assessment, December 2015

Introduction

The Council is currently preparing a Core Strategy and Policies Development Plan Document Review (the 'Core Strategy Review') and a Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document (the 'Site Allocations plan') as part of the emerging Ipswich Local Plan. The plans are scheduled to be submitted for independent examination on or around 8th December 2015.

The draft plans were subject to Equality Impact (EQIA) screening at the drafting stage in December 2014. This preceded the formal public consultation under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Results of EQIA Screening, December 2014

The two draft plans were subject to equality impact screening using the Council's online system. The screening process indicated that the plans could affect the protected characteristics of disability and age (see Appendix 1). The reasons were that the plans:

- Include proposals for additional town centre pedestrianisation and public realm improvements, which could improve the street environment for disabled people and/or could change where disabled parking is provided.
- Make reference to the quality and versatility of housing and neighbourhoods for the elderly through lifetime homes and lifetime neighbourhoods.

Therefore, a full assessment was made.

Results of full Equality Impact Assessment, December 2014

The full EQIA was also carried out in December 2014 (see Appendix 2). It considered plan content and the consultation strategy for the formal regulation 19 public engagement. It concluded that:

'The Ipswich Local Plan content will have mainly a neutral impact on the characteristics. It could be positive in relation to age (e.g. in relation to housing suitability) and disability, through ensuring buildings are accessible, together with the Building Regulations Part M.

The EQIA also considered the consultation strategy for the plan proposals. It identified actions as follows:

- ensure that mailing lists used to notify people of the plan consultation include appropriate groups and organisations;
- ensuring that consultation events organised are accessible to all in terms of the venues and the days and times at which they are held; and
- targeting young people for consultation event(s) to ensure their views get heard.

In addition to the EQIA undertaken by officers, on 15th December 2014 the Council's Equalities Panel considered the draft Core Strategy Review and draft Site Allocations Plan. The actions emerging from the Equalities Panel were that a less formal version of the plans should be made available to residents during the consultation, a large print version should be available to residents on request and the plans should be available at the County Library.

Regulation 19 stage – measures taken to address recommendations

The proposed submission consultation December 2014 to March 2015 was conducted in accordance with the Ipswich Statement of Community Involvement Review March 2014 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (see also consultation statements). The following measures were taken to respond to the equality assessment recommendations and conclusions:

- All organisations on the Council's local plan mailing list were contacted to alert them to the consultation. The mailing list includes a wide range of groups, for example the Ipswich and Suffolk Commission for Racial Equality, Ipswich Disabled Advice Bureau, Ipswich Blind Society, and religious organisations.
- 'Drop in' events were held in six different locations dispersed across the Borough, all with wheelchair access, on different days from Mondays through to Saturdays and at different times between 11am and 8pm. The times of consultation events were varied to ensure that e.g. people of working age could attend after normal office hours and that anyone who prefers not to venture out at night could attend during the day.
- Summaries of the proposed submission Core Strategy Review and Site Allocations Plan were made available at the local plan drop in events.
- The plan documents were available online where font size could be changed to suit to the reader's needs. However, hard copies were available in libraries (including the County Library) and the Customer Services Centre and therefore the note to staff

included the statement: 'Alternative formats of the documents are available on request.' (See appendix 3).

Consideration was given to organizing an event for young people. The last such event was held to in 2009, to inform the adopted Core Strategy preparation process. However, because the stage reached this time around was the formal consultation stage ('regulation 19') of the two plans, which seeks views about their soundness rather than general feedback, it was decided that it would not be the most effective stage at which to specifically target young people. Instead, it was decided to focus this effort onto on other planning documents at an earlier stage of preparation. Thus in July 2015, a 'Survey Monkey' cycling to school survey was sent to schools and publicised on social media, in order to inform the draft Cycling Strategy Supplementary Planning Document. Also, a presentation on the local plan has been made to Ipswich School in response to a request.

Regulation 22 Stage – Proposed Pre-Submission Main Modifications and Submission of the Plans

Formal public consultation on the two draft plans took place between 12th December 2014 and 5th March 2015.

During the months since the consultation closed, the Government has changed a number of aspects of national policy and guidance. One such change has resulted in new optional standards for accessible and adaptable dwellings and wheelchair user dwellings replacing the Lifetime Homes standards previously referred to through the development plan documents. In response to the national policy changes and representations received to the submission draft DPDs, some Pre-Submission Main Modifications to the plans have been proposed by the Council. These were subject to public consultation between 9th October and 23rd November 2015.

Lifetime Homes was one of the aspects of the plans identified through the EQIA in December 2014 as potentially having a positive impact on the protected characteristics of age and disability. As Pre-Submission Main Modifications have been proposed to relevant parts of the plans, the EQIA has been revisited to test the impact of the plan changes. It is considered that the plans as modified still address the ageing and disabled population through the addition of reference to the optional standards for accessible and adaptable dwellings and wheelchair user dwellings to policy DM5 (Pre-Submission Main Modifications to the Core Strategy Review, Policy DM5). The Site Allocations plan still refers to Lifetime Neighbourhoods principle through paragraph 4.10, but the reference to Lifetime Homes has

been corrected to accessible and adaptable dwellings. It also encourages the provision of a mix of types and sizes of dwellings within new developments (Core Strategy Review Policy CS8).

The consultation on Pre-Submission Main Modifications was carried out in a manner consistent with the approach to the regulation 19 consultation. An exhibition and drop in was held on Saturday 7th November 2015 at Ipswich Town Hall, at which a summary of the proposed modifications was made available.

Appendix 1 Local Plan Screening December 2014

Screening Data

Name of Policy/report being assessed:

Ipswich Local Plan - proposed submission draft Core Strategy review and Site Allocations
DPD December 2014

Is this a new policy/report or existing?

New

What is it trying to achieve and why?

The local plan sets out policies to guide land use in the Borough until 2031. The policies will be used by the Council to determine planning applications. The policies will allocate some sites for certain uses and protect others from inappropriate development. The policies will also guide the nature and quality of development.

Who is intended to benefit and how?

It is intended to meet the needs of Ipswich for new housing, employment and other types of development. The local plan through the policies reconciles competing demands for land in the public interest.

Is responsibility for the proposed policy shared with another department or organisation? If so who and how are responsibilities split or shared?

No, it is the responsibility of Ipswich Borough Council as the local planning authority. Plan preparation is a statutory process.

Is there potential for differential impact (negative or positive) on any of the nine protected characteristics under the Equality Act 2010?

Yes

It could affect disability. For example, it proposes additional town centre pedestrianisation and public realm improvements, which could improve the street environment for disabled people and/or could change where disabled parking is provided.

It could improve the quality and versatility of housing and neighbourhoods for the elderly through lifetime homes and lifetime neighbourhoods.

Does the policy explicitly involve, or focus on a particular equalities group, i.e. because they have particular needs?

Yes (*see above*)

Date Screening Complete

12/12/14

If the answers are 'no' to questions 6 and 7 then there is no need to proceed to a full impact analysis

If 'yes' then a full impact analysis must be completed.

Appendix 2 Equality Impact Assessment December 2014

Impact Assessment Data

What evidence/data is being used in carrying out this equality analysis?

Findings from surveys, focus groups, consultations

Other evidence

Guidance on lifetime homes and neighbourhoods and policies from the draft plans. Currently there is no monitoring data available to indicate how many housing completions comply with Lifetime Homes standards.

Has a consultation been carried out on this policy?

Yes - The policies in the local plan were subject to informal public consultation between January and March 2014. The consultation results were reported to Executive on 4th November 2014

<https://democracy.ipswich.gov.uk/documents/g1350/Public%20reports%20pack%2004th-Nov-2014%2018.00%20Executive.pdf?T=10>.

A further formal consultation will take place 12th December 2014 to 5th March 2015.

Did you engage or involve any specific protected groups in the consultation?

- Age
- Disability
- Race
- Religion or Belief

There are two important types of potential impacts arising from the Local Plan: the first is impacts which may arise through the implementation of the land use policies contained in the local plan (addressed below) and the second is impacts which may arise from the statutory consultation processes on the draft plan.

Regarding plan consultation, the Council's Statement of Community Involvement Review, which governs how consultation is carried out (together with the Town and Country Planning (Local Planning) (England) Regulations 2012), was previously discussed with the Ipswich Equality Panel prior to its adoption March 2014. The Local Plan itself is due for discussion with the Equality Panel on 15th December 2014.

The Local Plan mailing list to whom all notifications of consultations are sent includes:

- Ipswich religious groups and churches e.g. Church of England, Baptist Church, Methodist Church, Quakers, Shiloh Pentecostal Fellowship, 7th Day Adventists, Ipswich Bangladeshi Mosque, Jehovahs Witnesses, Ipswich Hindu Samaj;
- Disability groups e.g. Ipswich Disabled Advice Bureau, Ipswich Blind Society, Ipswich Charioteers Wheelchair Football Club and East Suffolk MIND;
- Community Action Suffolk;
- Ethnic groups such as the Chinese Association, Bangladeshi Support Centre, Indian Association, Italian Association and Ipswich and Suffolk Commission for Racial Equality
- Age-specific organisations such as Ipswich primary and secondary schools and Age UK Suffolk.

AGE

Positive Impact

The plan content addresses the ageing population e.g. through the encouragement of Lifetime Homes and Lifetime Neighbourhoods standards in new development (Core Strategy Review paragraph 9.51, Sites DPD para 4.10 for example). This is about helping older people remain in their home and neighbourhood as their mobility needs change.

In terms of consultation, previous evidence (feedback sheets from an earlier consultation) demonstrates that the majority of respondents to plan consultations are aged over 60.

Therefore a consultation event is planned for secondary school geography pupils in February 2015 to specifically engage with younger people. The times of consultation events have been varied to ensure that e.g. people of working age could attend after normal office hours and that anyone who prefers not to venture out at night could attend during the day.

DISABILITY

Positive Impact

The plan content addresses disability e.g. Core Strategy para 8.66, and DM5(f) refers to accessible buildings. Please note the Building Regulations also address this matter.

In terms of the consultation on the plan, all venues for consultation events are wheelchair accessible.

RACE

Positive Impact

In terms of the plan content a neutral to positive impact would be expected. E.g. the plan makes provision for Gypsies and travellers (Sites DPD policy SP4 and Core Strategy review policy CS11). It does not make specific provision for other ethnic groups but the policies apply equally across the whole Borough to all communities.

In terms of the consultation, ethnic groups where known are included on the mailing list and made aware of the plans and the opportunity to comment. The Council's Area Committees are used to engage with communities so that if people prefer to stay in their neighbourhood and/or prefer to speak to an officer rather than read written material, it is possible to do so.

GENDER REASSIGNMENT

None Identified

RELIGION OR BELIEF

Positive Impact

In terms of the plan content, a neutral impact would be expected. In terms of the consultation process, religious groups where known are notified of the plan consultation. Consultation events are planned for a range of days so as not to clash with holy days and enable everyone to attend who wishes to.

SEX

None Identified

SEXUAL ORIENTATION

None Identified

PREGNANCY AND MATERNITY

None Identified

Land use policies would have no impact on this characteristic.

Is there any potential for unequal outcomes, disadvantage or unlawful discrimination relating to any of the above protected groups, if the policy is implemented as proposed?

No

If yes, you MUST consider the following options:

Within the scope of the policy, are you able to:

Implement the policy in ways that can encourage greater participation by a particular group or community, where this is low?

Previous consultation responses have indicated that respondents tend to be over retirement age and therefore where possible we target consultation or engagement events at young people.

Comments received during plan consultations are checked and, where necessary to promote community cohesion, are edited prior to publication.

Summary of key issues identified, and actions or changes made to the policy as a result of this analysis:

The Ipswich Local Plan content will have mainly a neutral impact on the characteristics. It could be positive in relation to age (e.g. in relation to housing suitability) and disability, through ensuring buildings are accessible, together with the Building Regulations Part M.

In terms of consultation on the plan proposals, the key actions are:

- ensuring that mailing lists used to notify people of the plan consultation include appropriate groups and organisations;
- ensuring that consultation events organised are accessible to all in terms of the venues and the days and times at which they are held; and
- targeting young people for consultation event(s) to ensure their views get heard.

Appendix 3 Extract from Note to Library Staff, December 2014 (emphasis added)

Note to staff at the libraries and the Customer Services Centre

Ipswich Borough Council Local Plan Consultation – 12th December 2014 – 5th March 2015

Ipswich Borough Council is undertaking a public consultation on two local planning documents, their supporting documentation listed below and two Ipswich Local Plan policies maps, which set out the location of proposals in the plan on an Ordnance Survey base map.

- Proposed Submission Core Strategy and Policies development plan document (DPD) review (November 2014)
 - Sustainability Appraisal
 - Appropriate Assessment
- Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD (November 2014)
 - Sustainability Appraisal
 - Appropriate Assessment
- Local Plan Policies Map
- Local Plan Policies (inset) Map

The public have been invited to make comments on these documents. To allow the public to get involved in the consultation we need the documents to be available for public inspection in libraries across Ipswich and the Customer Services Centre. The documents that have been handed to you are to be kept on display for reference use only, from Friday 12th December to Thursday 5th March 2015 at 5pm. **Alternative formats of the documents are available on request.**