Ipswich Local Plan Equality Impact Assessment

1. Introduction

- 1.1 This report sets out the results of the Equality Impact Assessment of the draft Ipswich Local Plan.
- 1.2 The Ipswich Local Plan details the strategic approach to development across Ipswich. A review of the adopted Ipswich Local Plan 2017 is currently underway in order to prepare aligned local plans with Babergh, Mid Suffolk and Suffolk Coastal District Councils.
- 1.3 The first stage of the Ipswich aligned Local Plan review was an Issues and Options consultation, which took place between August and October 2017.
- 1.4 A Preferred Options Local Plan document has now been prepared and once the detail of the plan is agreed by Executive, will be subject to public consultation.
- 1.5 The Local Plan Review Preferred Options include amendments to the current:
 - Vision and objectives;
 - Core Strategy ('CS') policies;
 - Development Management ('DM') policies; and
 - Site allocation ('SP') policies.
- 1.6 This Equality Impact Assessment assesses the likely impact of the draft Local Plan on the protected groups.

2. Profile of Ipswich

2.1 The Local Government Association's Equality Framework for Local Government states that local authorities should 'know' their communities and 'aim to base their policies, procedures and other actions on sound evidence and research around their needs'. The following outlines the population profile of Ipswich based upon the nine protected characteristics and forms the basis for assessing the impact of the Local Plan on each of the protected groups.

Age

- 2.2 The population of Ipswich is 138,500, 18.3% of the Suffolk population (728,200).
- 2.3 The Office for National Statistics' (ONS) 2017 Mid-Year Population Estimates show that Ipswich has a younger population than both the East of England and Great Britain. The ONS indicates that 88,300 or 63.8% of the population is aged 16-64, compared to 61.3% in the East of England and 62.9% in Great Britain.

Disability

- 2.4 The Equality Act states that a person has a disability if he or she 'has a physical or mental impairment' which has 'a substantial and long-term adverse effect on [his or her] ability to carry out normal day-to-day activities'.
- 2.5 According to the 2011 Census, 18% of Ipswich's population (23,542 people) suffers from a long-term health problem or disability which impacts upon their everyday activities. This is slightly more than in England, where 17.6% of the respective populations live with a long-term health problem or disability.

Gender Reassignment

2.6 At present, there is no reliable local data on gender reassignment. The Office for National Statistics recognises that there is a lack of information on transgender people and has consulted on possible questions to be included in the 2021 Census.

Marriage and Civil Partnership

- 2.7 According to the 2011 Census, 46,691 people are married in Ipswich; this equates to 43% of the Borough's population who are aged 16 and over. The proportion of the population which is married in the Borough is less than in England (46.6%).
- 2.8 The Census also reports that 0.2% of Ipswich's population (260 people) is living in a registered same-sex civil partnership, an identical proportion to that in England.

Pregnancy and Maternity

- 2.9 The Office for National Statistics reports that there were 1,334 registered births in Ipswich in 2015. At 66.6%, the birth rate per 1,000 of the female population aged 15 to 44 in Ipswich is higher than that of Suffolk (60.9%) and England (62.5%).
- 2.10 The total fertility rate, the average number of live children that a woman is expected to bear in her lifetime, is also higher in Ipswich when compared to Suffolk and England.

Race

2.11 Ipswich is one of the most diverse areas in the East of England with 17.1% of the community from non-white British ethnicities. The following table summarises the ethnic diversity of Ipswich as of the 2011 Census, please note that persons with multiple ancestries could indicate their respective ethnic backgrounds under multiple ethnic groups.

Figure 1 - Ethic groups lpswich

Ethnic Group	Number of people	Percentage
White	118,596	88.9

English/Welsh/Scottish/Northern Irish/British	110,624	82.9
Irish	610	0.5
Gypsy or Irish Traveller	149	0.1
Other White	7,213	5.4
Mixed/multiple ethnic groups	4,816	3.6
White and Black Caribbean	2,579	1.9
White and Black African	655	0.5
White and Asian	637	0.5
Other Mixed	945	0.7
Asian/Asian British	5,740	4.3
Indian	1,801	1.4
Pakistani	242	0.2
Bangladeshi	1,687	1.3
Chinese	666	0.5
Other Asian	1,344	1.0
Black/African/Caribbean/Black British	3,096	2.3
African	1,025	0.8
Caribbean	1,554	1.2
Other Black	517	0.4
Other ethnic group	1,136	0.9
Arab	151	0.1
Any other ethnic group	985	0.7

2.12 Over 70 main languages were identified as being spoken in Ipswich (Census 2011). English is spoken as the main language by all people aged 16 and over in 91.16% of households (32,736) in Ipswich. This is more than in England overall (90.9%). The Census also indicates that 5.4% of households (3,086) in the Borough have no residents who speak English as a main language, whilst in England, the figures is 4.4%. It should be noted that this does not mean that the people within these households cannot speak English. The Office for National Statistics observes that many people identified their English proficiency as 'good' or 'very good' within these households.

Religion or Belief

- 2.13 According to the 2011 Census, 58% of Ipswich's population (77,048 people) has a religion. This is less than in the East and England, 65% and 68% of the population respectively.
- 2.14 The number of people in Ipswich who stated their religion as Christianity 53% (70,797 people) has declined compared to the last Census 68.10%. The number of people following different religions has increased. The following table shows the religious diversity of Ipswich.

Figure 2 - Religion Ipswich

U .	oswich Number)	Ipswich (%)	East (%)	England (%)
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Has religion	77,048	57.7%	64.8%	68.1
Christian	70,797	53.1%	59.7	59.4
Buddhist	495	0.4%	0.4	0.5
Hindu	1,102	0.8%	0.9	1.5
Jewish	83	0.1%	0.6	0.5
Muslim	3,577	2.7%	2.5	5
Sikh	343	0.3%	0.3	0.8
Other	651	0.5%	0.4	0.4
No religion	46,687	35%	27.9	24.7
Not stated	9,649	7.2%	7.3	7.2

Sex

2.15 According to the Office for National Statistics, 50.2% (66,956) of the Borough's population is female and 49.8% (66,428 people) is male. In England's 50.7% of population is female and 49.3% is male.

Sexual Orientation

- 2.16 The Office for National Statistics' Annual Population Survey collects information on self-perceived sexual identity. However, the data is output only at the regional and national level. The 2013-2015 Survey reports that 94.8% of the East's population aged 16 and over is heterosexual or straight, 0.8% is gay or lesbian and 0.5% is bisexual. In England, it observes that 93.6% of the population is heterosexual, 1.1% is gay or lesbian, and 0.6% is bisexual.
- 2.17 There is limited local authority data on sexual orientation. The Office for National Statistics chose not to include a specific question on sexual identity in the 2011 Census, observing that sexuality is multifaceted and difficult to define. However, as noted above, the Census reports that 0.2% of Ipswich's population is living in a registered same-sex civil partnership.

3. Equality Impact Assessment: Scoping of Policies

- 3.1 Many of the policies within the Plan will benefit the wider community across lpswich and not specifically those with protected characteristics.
- 3.2 Some policies will have the potential for some direct or indirect impact on different groups. The table below lists the draft local plan policies and assesses the likely impact of the Plan's policies on equalities groups.

				Eq	uality Grou	ups				
Local Plan Policy	Age	Disability	Gender Reassignme nt	Race and Ethnicity	Religion	Gender	Sexual Orientation	Marriage and Civil Partnership	Pregnancy and Maternity	Explanation and evidence
CS1 Presumption in Favour of Sustainable Development	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy CS1 supports the transition to a low carbon future and reflects the presumption in favour of sustainable development contained within the NPPF. The application of this policy will therefore benefit all groups. There are likely to be no equality issues associated with this policy.
CS2 The Location and Nature of Development	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy CS2 encourages development in locations where people can easily access jobs, good and services by the most sustainable mode of travel. This policy will benefit less mobile groups such as older and disabled people as it will increase accessibility to services.
CS3 IP-One Area Action Plan	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy CS3 supports the implementation of an IP-One Areas Action Plan to help deliver the Ipswich Vision of a waterfront town centre. There are likely to be no equality issues associated with this policy.
CS4 Protecting our Assets	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy CS4 aims to protect and enhance the Boroughs built, historic, natural and geological assets. The application of this policy will benefit all

Figure 3 - Equality Impact Assessment of Draft Local Plan Policies

										groups. There are likely to be no equality issues associated with this policy.
CS5 Improving Accessibility	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Policy CS5 seeks to optimise the accessibility of new development. The policy is also aimed at ensuring the accessibility of the town centre and individual buildings and developments by people whose mobility is impaired. Good access benefits everyone. However, many people are disadvantaged by poor access to facilities and buildings and vulnerable and disadvantaged groups, such as the elderly, disabled people and pregnant women, can be particularly affected. Poor access can also be caused by difficulties in using the facilities themselves. This policy will benefit less mobile groups as it will increase accessibility to services.
CS7 The Amount of New Housing Required	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy CS7 aims to secure sufficient supply of housing to meet the needs of existing and future households. The housing requirement figure has been updated to reflect the governments new standard methodology. New housing is more likely to benefit younger people as they are less likely to be homeowners. They are therefore more likely to benefit from new homes being built, as a result of the resulting downward pressure on house prices and rents.
CS8 Housing Type and Tenure	Positive	Positive	Neutral	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Policy CS8 supports a mix of dwelling types to be provided in order to achieve strong vibrant and healthy communities. As identified above new

										housing including starter homes are more likely to benefit younger people as they are less likely to already be homeowners. Social rent and affordable rental sectors have a higher prevalence of households containing someone with a disability or long term illness than other housing sectors, therefore they may disproportionately benefit from increases in housing supply, depending on the tenure of housing resulting. Women could benefit indirectly from an increase in affordable rental properties as they are more represented in these affordable rental properties. Similarly, disproportionately benefit from increases in housing supply, depending on the tenure of housing resulting. Similarly,
CS10 Ipswich Garden Suburb	Positive	Positive	Neutral	Positive	Neutral	Positive	Neutral	Neutral	Positive	Policy CS9 provides for residential led development at Ipswich Garden Suburb. The Garden Suburb forms a key component of meeting Ipswich's housing need. The policy seeks 31% affordable housing at Ipswich Garden Suburb. The provision of affordable homes is most likely to help those groups identified above. Policy CS10 also identifies detailed infrastructure requirements, ensuring the accessibility of services. Good access benefits everyone, however particularly those whose mobility is impaired such as the elderly, disabled people and pregnant women.

CS11 Gypsy and Traveller Accommodation	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Through policy CS11 sufficient additional pitches will be delivered to meet the needs of Ipswich's Gypsies and Travelers by 2036. Romany Gypsies and Irish Gypsies are an ethnic group. The policy will benefit the gypsies and travellers community.
CS12 Affordable Housing	Positive	Positive	Neutral	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Policy CS12 seeks to ensure that a choice of homes is available to meet identified affordable housing needs in Ipswich. Many people with characteristics protected by the Equality Act are concentrated among lower income households.
CS13 Planning for Jobs Growth	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	This policy sets out the general approaches to growth and specific locations to which growth will be focused. Under policy CS13 the employment land requirement has been updated to reflect the Local Sector Needs Assessment Report 2017. There are likely to be no equality issues associated with this policy.
CS14 Retail Development and Main Town Centre Uses	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	This policy seeks to promote high quality investment development in Ipswich Central Shopping Area and increase the retail offer within Ipswich Central. The retail land requirement figure has been updated to reflect the new Ipswich and Suffolk Coastal Retail and Commercial Leisure Study. This policy will benefit less mobile groups such as older and disabled people and people with young children as it will increase accessibility to services.

CS15 Education Provision	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy protects education facilities. This policy will benefit children and young adults.
CS16 Green Infrastructure, Sport and Recreation	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy CS16 safeguards, protects and enhances biodiversity and the environment in Ipswich. This proposal will benefit all groups. There are likely to be no equality issues associated with this policy.
CS17 Delivering Infrastructure	Positive	Positive	Neutral	Policy CS17 requires all development to meet the on and off site infrastructure requirements needed to support development and mitigate the impact. Childcare, early year and education infrastructure will be secured through this policy, as well health and emergency services and community and cultural facilities. This policy will benefit all groups, but in particular those in poor health and children and young adults in education.						
CS18 Strategic Flood Defence	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Much of Ipswich lies within the tidal floodplain of the River Orwell. This policy affirms the Councils continued commitment to work with its partners to implement the Ipswich Flood Defence Management Strategy to support regeneration in Ipswich.
CS19 Provision of Health Services	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Policy CS18 aims to protect existing health facilities and support provision of new ones. The policy will benefit groups with higher health related needs such as older and disabled people. There are likely to be no equality issues associated with this policy.

| CS20 Key Transport
Proposals | Positive | Positive | Neutral | Policy CS20 supports measures to
improve sustainable travel options
across the borough. The policy
supports strategic transport
improvements as well as measures to
facilitate walking and cycling. The
policy will benefit groups with higher
health related needs such as older
and disabled people. There are likely
to be no equality issues associated
with this policy. |
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| DM1 Sustainable
Construction | Positive | Positive | Neutral | Policy DM1 seeks a high standard of
environmental sustainability in new
residential developments and non-
residential developments over 500
square metres. The potential effects
of climate change include higher
temperatures and increased risk of
flooding. Evidence suggests that very
young children, older people, people
in poor health and those with mobility
issues are most vulnerable to the
effects of climate change. The
application of this policy should
benefit all groups however would
have particular benefits for young
children, older people and those in
poor health in the long term. |
| DM2 Decentralised
Renewable and Low
Carbon Energy
Systems | Positive | Positive | Neutral | Policy DM2 supports the delivery of
renewable and low carbon energy.
Renewable energy is non-polluting
and a non-contributor to global
warming. As discussed above
evidence suggests that the young, old
and those with certain health
conditions are most vulnerable to the
effects of climate change. The
application of this policy will therefore
benefit all groups, but will have |

| DM3 Air Quality | Positive | Positive | Neutral | particular benefit for young, old and
those with certain health conditions,
in the long term.
The new policy seeks to mitigate
against the impact of development on
air quality. Everyone can be affected
by poor air quality when exposed over
long periods, however research by
the World Health Organisation has
shown that babies, children, older
adults and those with asthma,
cardiovascular disease and lung
disease are most likely to be affected
by air pollution. This policy will
therefore have particular benefits for |
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| DM4 Flood Risk | Positive | Positive | Neutral | these groups.
Policy DM4 seeks to ensure that
inappropriate development in areas
at risk of flooding is avoided. It also
requires development proposals at
risk from flooding to mitigate against
flood risk. Flood events do not
distinguish between person or
property type and therefore all groups
should benefit from this policy.
Certain groups with protected
characteristics are also likely to
benefit from the policy. Older people,
disabled people and pregnant
women, who are less mobile are also
likely to benefit from the policy. |
| DM5 Protection of
Open Spaces, Sport
and Recreational
Facilities | Positive | Positive | Neutral | The policy seeks to protect existing
open spaces, sport and recreational
facilities. The policy will benefit
groups with higher health-related
needs such as older and disabled
people. |

DM6 Provision of New Open Spaces, Sport and Recreational Facilities	Positive	Positive	Neutral	The policy also seeks to support provision of new open spaces, sport and recreational facilities. Again, the policy will benefit groups with higher health-related needs such as older and disabled people.						
DM7 Provision of Private Outdoor Amenity Space in New and Existing Developments	Positive	Positive	Neutral	The policy seeks to ensure that new residential developments deliver a high quality and environmentally sustainable living environment and includes a requirement for all private garden and outdoor amenity space to be safely accessible to occupants. This is likely to have a positive impact upon those with disabilities and older adults with mobility issues.						
DM8 The Natural Environment	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy DM8 seeks to enhance conditions for biodiversity throughout the borough for the benefit of all groups. There are likely to be no equality issues associated with this policy.
DM9 Protection of Trees and Hedgerows	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The Council will seek to protect green spaces, trees, gardens and habitats under this policy. It is considered that the policy will benefit all sections of the community, though there the impact on protected characteristics is neutral.
DM10 Green Corridors	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy aims to protect and enhance the towns green corridors, which are used for recreation, amenity, cycling and walking. All groups should benefit from the policy and there are likely to be no equality issues associated with this policy.
DM11 Countryside	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy DM11 seeks to ensure that development maintains the character

										of the Ipswich countryside for the benefit of all groups. There are likely to be no equality issues associated with this policy.
DM12 Design and Character	Positive	Positive	Neutral	Under this policy, the Council will require a high standard of design for all buildings and spaces in the borough. A key element of good design recognised in the policy is ensuring that buildings are accessible to all. Examples of features which improve accessibility could include wheelchair access, step free routes, way finding and non-slip surfaces. Those less mobile, including older and disabled people will benefit particularly in this respect.						
DM13 Heritage and Conservation	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to preserve and enhance the boroughs heritage assets for the benefit of all groups. The application of this policy will benefit all groups. There are likely to be no equality issues associated with this policy.
DM14 Archaeology	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to protect archaeological deposits. The application of this policy will benefit all groups. There are likely to be no equality issues associated with this policy.
DM15 Tall Buildings	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy DM15 seeks to ensure that tall buildings are developed in appropriate locations and are of the required quality. There are likely to be no equality issues associated with this policy.
DM16 Extensions to Dwellinghouses and	Positive	Positive	Neutral	The policy allows for the development of residential annexe in carefully						

Provision of Ancillary Buildings										considered locations. The provision of annexes often allows for the elderly, young adults and those with disabilities to live semi independently within the dwelling thus providing alternative residential solutions.
DM17 Small Scale Infill and Backland Residential Development	Positive	Positive	Neutral	Policy DM17 seeks to protect against unsuitable backland development. Under this policy, the Council will require new development to have safe and convenient access. Those less mobile, including the elderly and disabled users will benefit particularly in this respect.						
DM18 Protection of Amenity	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Policy DM18 promotes a high standard of amenity. The application of this policy will benefit all groups. There are likely to be no equality issues associated with this policy.
DM19 The Subdivision of Family Dwellings	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy seeks to prevent the conversion of small and modest sized family houses. Housing of this type can provide an important source of accommodation for younger people starting out on the housing ladder and older people looking to downsize, both groups will benefit from this policy.
DM20 Transport and Access in New Developments	Positive	Positive	Neutral	The policy seeks to promote opportunities for sustainable travel. The policy will benefit the less mobile including the elderly and disabled.						
DM21 Car and Cycle Parking	Positive	Positive	Neutral	Elements of the policy include the requirement to improve conditions for pedestrians and cyclists. The policy will be of particular benefit to young people and older people who						

										are more likely to be reliant upon the existing bus network.
DM22 The Density of Residential Development	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	This policy will make a positive contribution to the identified housing needs of the borough. The policy benefits everyone, though the impact on protected characteristics is neutral.
DM23 Protection and Provision of Community Facilities	Positive	Positive	Neutral	Community facilities will be protected and provision of new facilities promoted under this policy. The application of policy DM23 will benefit all groups.						
DM24 Shopfronts	Positive	Positive	Neutral	Policy DM24 seeks to ensure that shopfronts are well designed and respect local character. The policy also aims to ensure that safety is considered within the design of shopfronts and seeks the use of active frontages to encourage pedestrian use. Policy DM24 is therefore likely to benefit groups particularly affected by crime and fear of crime including the elderly. The policy also expects shopfronts to be 'suitably accessible'. Good access benefits everyone, but in particular the disabled and elderly who are disadvantaged by poor access to facilities and buildings.						
DM25 Advertisements	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	The policy provides guidance on the siting and design of advertisements. The policy will benefit all sections of the community, though the impact on protected characteristics is neutral.
DM26 The Central Shopping Area	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	This policy seeks to protect the vibrancy and viability of Ipswich Town Centre. The policy will benefit all

DM27 Arts, Culture and Tourism	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	sections of the community, though the impact on protected characteristics is neutral This policy seeks to support the retention and enhancement of arts, culture and tourism facilities. The policy will benefit all sections of the community, though the impact on
DM28 The Evening and Night-time Economy	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	protected characteristics is neutral. This new policy seeks to promote the towns evening and night-time economy, whilst protect the amenity of residential occupiers in town centre properties. Application of this policy would not specifically benefit those groups protected by the Equality Act.
DM29 District and Local Centres	Positive	Positive	Neutral	Increasing or maintaining the accessibility to shopping will be of particular benefit to less mobile groups such as disabled and older people and people with young children.						
DM30 Town Centre Uses Outside the Central Shopping Area	Positive	Positive	Neutral	Policy DM30 identifies appropriate town centre uses. The policy ensures that the town centre remains the most accessible part of the Borough. This policy will benefit less mobile groups as it will increase/maintain accessibility to services.						
DM31 Retail Proposals Outside the Central Shopping Area	Positive	Positive	Neutral	Policy DM31 sets criteria under which retail proposals outside the Central Shopping Area will be acceptable. The policy ensures that the town centre remains vibrant and viable. Again, this policy will benefit less mobile groups as it will increase/maintain accessibility to services.						

| DM32 Protection of
Employment Land | Neutral | Policy DM32 ensures that defined
Employment Areas are safeguarded
for employment and ancillary uses.
The policy is designed to safeguard
significant employment clusters. The
application of this policy will benefit all
groups. There are likely to be no
equality issues associated with this
policy. |
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| DM33 Delivery and
Expansion of Digital
Communications
Network | Neutral | This policy is designed to encourage
delivery of a high quality, reliable
digital communications network. The
application of this policy will benefit all
groups. |

4. Conclusions

- 4.1 This Equality Impact Assessment demonstrates that none of the Local Plan policies have a negative impact and therefore no modifications to any of these policies are required.
- 4.2 Many of the policies will benefit the wider community across Ipswich and not specifically those with protected characteristics.