



Local Development Framework for South Kesteven

Submission Core Strategy

Equality Impact Assessment

August 2009



SOUTH KESTEVEN DISTRICT COUNCIL

**SUBMISSION CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

EQUALITY IMPACT ASSESSMENT

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1.0 Introduction

1.1 The Council is required under law¹ to gather and take into account information on how its policies and practices affect equality in the delivery of services and in the workplace.

1.2 There are seven recognised equality strands:

• Age	• Religion or belief
• Disability	• Transgender identity
• Gender	• Sexual orientation
• Race and nationality (ethnicity)	

1.3 The Council's Generic Equality Scheme² sets out a commitment to conducting Equality Impact Assessments to help understand how the Council's services impact on local people.

1.4 Equality Impact Assessment (EqIA) is a way of checking the Council's arrangements to ensure that they provide the same equality of provision for all, eliminate discrimination and promote cohesive communities.

1.5 It provides an opportunity to find out whether a policy, procedure or function affects or will affect different groups of people in different ways. If they do and the result is a group may be disadvantaged then the Council must take reasonable action to rectify this.

2.0 Core Strategy Development Plan Document

2.1 The Core Strategy Development Plan Document (DPD) is a key document of the South Kesteven Local Development Framework (LDF), which will replace the saved policies of the South Kesteven Local Plan.

2.2 The aim of the Core Strategy is to provide the spatial policy framework for development and change in the District for the period to 2026. It provides a long term Vision for the District and strategic objectives. It establishes through a spatial strategy and core policies the key principles, which should guide the location, use and form of development.

2.3 The Core Strategy identifies locations for development to meet the District's needs including housing, employment, retail, leisure, community facilities and public transport.

¹ In relation to the Race Relation Amendment Act 2000, Disability Discrimination Act 2005 and Sex Discrimination Act 2007

² March 2005. Revised version approved by Cabinet on 6th April 2009

- 2.4 During the preparation of the Core Strategy there have been four periods of public engagement, undertaken in accordance with the Council's adopted Statement of Community Involvement:
- Issues and Options – September to November 2005
 - Preferred Options – June to August 2006
 - Revised Preferred Options – May to June 2007
 - Draft Submission Document – January to February 2009
- 2.5 At each of these consultation stages, the Council has sought feedback from the public and key stakeholders to help shape development of the Core Strategy and the policies within it. The Council has sought to make engagement with the Core Strategy accessible, facilitated through exhibitions, local forums, local advertising, distribution of letters and consultation documents and articles in SK Today, which is delivered to all households in the District.
- 2.6 Consultation methods targeted at the wider community may have indirectly benefited a particular equality group, including:
- Making paper copies of all consultation documents freely available through a variety of sources including the Council's main and area offices and local libraries
 - Making documents available electronically on the website – the website is speech enabled, can be read as text pages only and can be translated into 10 languages
 - Making documents available on request in alternative formats including alternative languages, large print, Braille, audio tape or computer disc
 - Holding of public exhibitions around the District in locations accessible to local communities from both the rural and urban parts of the District. The venues were accessible and held at different times, including at weekends, to enable as wide a range of people as possible to attend
- 2.7 The Council also sought to engage with representative equality groups and consulted a number of specific or umbrella groups, listed in Appendix 1.
- 2.8 The Statement of Compliance (Regulation 30(d)) sets out in full the consultation process that has been undertaken in preparing the Core Strategy, detailing those organisations and others invited to make representations, how they were invited and how the representations made were taken into account in preparing the Core Strategy. The Statement is available on the Council's website.
- 2.9 In general it is considered that the consultation arrangements for the Core Strategy preparation have not affected any person or group of persons differently.

3.0 Equality Impact Assessment Process

- 3.1 In accordance with the Council's guidance on undertaking EqIA assessments, an initial assessment was undertaken to determine whether or not it was necessary to undertake a full EqIA.
- 3.2 The initial assessment took into account existing knowledge, data and a best estimate of the scope of the issue and whether there was evidence or reason to believe that some groups could be differently affected.
- 3.3 The EqIA was undertaken by the Planning Policy Service Manager, a member of the Planning Policy team responsible for preparing the Core Strategy DPD and a service manager from another service area within the Council.
- 3.4 The initial assessment consisted of three stages:
- Identifying the main aims of the policy
 - Collecting information
 - Deciding if the policy will be subject to a full EqIA

Identifying the main aims of the policy

- 3.5 The main aims of the Core Strategy DPD can be best summarised by referring to the Vision for the District, as set out in the DPD:

A successful rural district supported by an excellent social and transport infrastructure. Grantham will have developed as a key economic centre not only in Lincolnshire but also sub regionally. Stamford, Bourne and The Deepings will have equally developed their distinctive market town roles. Rural communities will have remained viable by achieving development that supports their needs. All of this will have been achieved in ways which ensures a good quality of life, health and well being for everyone as well as celebrating the distinctiveness of the District's countryside and heritage.

Collecting information

- 3.6 The preparation of the Core Strategy DPD has been informed by a number of sources of information and evidence studies. These also provide information on particular community needs thereby informing the initial EqIA as to whether the Core Strategy DPD was likely to have an adverse impact or discriminate against different groups in the community.
- 3.7 The following sources of information have been used:

- Data from Office for National Statistics, including Census data
- Indices of Multiple Deprivation 2007
- South Kesteven Housing Needs Study 2006
- Peterborough Sub Regional Strategic Housing Market Assessment 2007
- South Kesteven Gypsy and Traveller Housing Needs Survey 2006
- Lincolnshire Gypsy and Traveller Accommodation Assessment 2007

Deciding if the policy will be subject to a full EqIA

- 3.8 The initial EqIA can be found at Appendix 2.
- 3.9 This concluded that the Core Strategy DPD did not have any adverse differential impacts on any of the identified equality groups and, as a consequence, a full EqIA was not required. The implementation and impact of the Core Strategy policies will, however, be monitored through the Annual Monitoring Report.
- 3.10 The initial EqIA did identify the following potential opportunities for improvement in the preparation of subsequent documents:
- Information on service users - review approach to collecting monitoring data on service users i.e. those attending consultation events or responding to documents. To be undertaken as part of review of Statement of Community Involvement
 - Information in the document on availability of alternative formats – this would need to be undertaken as part of a corporate review, as the document layout is currently consistent with the Council's corporate document style

- Age Concern Kesteven
- Arthritis Care
- Bourne & South Lincs ME Support Group
- Castlegate Churches Contact Group
- Commission for Racial Equality*
- Disability Rights Commission*
- Disabled Persons Transport Advisory Committee
- GCF Youth Group
- Gypsy Council
- Help the Aged
- Kesteven Blind Society
- Learning Skills Council
- Lincolnshire Gypsy Liaison Group
- Showmen's Guild of Great Britain
- South Kesteven Disability Forum
- South Lincs Blind Society
- South Lincs Community and Voluntary Services
- Voluntary Action Kesteven

Note: Details are taken from the adopted Statement of Community Involvement (April 2006).

* superceded by Equality and Human Rights Commission

Section: Planning Policy		Names of those undertaking assessment: Karen Sinclair, Kev Martin, Penny Mould	
Name of Policy to be assessed: Submission Core Strategy Development Plan Document	Date of Assessment: 19/09/08	Is this a new or existing policy/procedure? New policy	
1. Briefly describe the aims, objectives and purpose of the policy/procedure:			
<p>There is a requirement under the Planning and Compulsory Purchase Act 2004 to prepare a LDF to replace existing Local Plans. The Core Strategy Development Plan Document (DPD) is the key document of the Local Development Framework (LDF) and will provide the planning policy framework for the development of further more detailed DPDs and Supplementary Planning Documents.</p> <p>The Core Strategy is an overarching strategic document setting out the long-term spatial vision for South Kesteven and the strategic policies and proposals to deliver that vision. It contains policies on how much, where and when development will take place and policies against which planning applications may be assessed. The policies in the Core Strategy will replace those contained in the adopted South Kesteven Local Plan (1995).</p> <p>The purpose of the Core Strategy is to provide to the general public, developers, interest groups and all other interested parties a clear understanding of the strategy and scale and form of future development in South Kesteven.</p> <p>The Submission Core Strategy represents the final stage in the preparation of the document prior to it be submitted to the Secretary of State for Communities and Local Government for independent examination.</p>			
2. What are the key performance indicators?			
<p>The Core Strategy contains a section on implementation and monitoring which set out indicators and targets to monitor the effectiveness of the policy implementation. An Annual Monitoring Report is required to be prepared annually to report on the implementation of the Core Strategy. The AMR is submitted to the Secretary of State for Communities and Local Government and is made available on the Council's website. The implementation of the Core Strategy policies are also monitored against indicators contained in the Local Area Agreement and the National Indicator set.</p>			
3. Who will be affected by this policy/procedure?			
<p>The Core Strategy will affect anyone that works, lives or visits the District. Particularly, it will impact on anyone who submits a planning application for new development.</p>			

<p>4. Who is intended to benefit from this policy and in what way?</p> <p>Policies in the Core Strategy will benefit anyone that works, lives or visits the District. It provides a consistent framework upon which decisions on proposals can be made. It seeks to promote appropriate development, whilst protecting the built and natural environment.</p>
<p>5. Are there any other organisations involved in the delivery of the service?</p> <p>There will be a number of other organisations involved including: Government Office for the East Midlands, East Midlands Regional Assembly, English Heritage, Lincolnshire County Council (in particular Highways and Education Departments), Lincolnshire Enterprise, Environment Agency, Natural England, House Builders Federation, Local Strategic Partnership, Utility Companies, Registered Social Landlords and private housebuilders.</p>
<p>6. What outcomes are required from this policy and for whom?</p> <p>The outcomes of the Core Strategy will provide a consistent framework for decision making on future development plan documents and planning applications.</p>
<p>7. What factors/forces could contribute/detract from the outcomes?</p> <p>International, national, and regional variations in planning policy/guidance Setting of Council priorities Resource delivery (deficiency/efficiency) Political changes at local and national level Effects of climate change Variations in the economic climate Delay in the delivery of infrastructure</p>
<p>8. Who are the main stakeholders in relation to the policy/procedure?</p> <p>Residents, businesses, visitors, agents, developers, landowners, community groups, national and regional stakeholders, voluntary sector.</p>
<p>9. Who implements the policy, and who is responsible for the policy/procedure?</p> <p>South Kesteven District Council implements the policy principally through the Planning Policy and Development Control Services but implementation is also reliant on other partners including other public sector organisations (LCC), developers, infrastructure providers, funding bodies and the private sector (housebuilders and developers). The Corporate Head and Service Managers are responsible for the policy.</p>
<p>10. Are there concerns that the policy/procedure <u>could</u> have a differential impact on different racial groups? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?</p> <p>The strategy makes reference to the provision of accommodation to meet the identified needs of Gypsies and Travellers. However the relevant policy relating to this is criteria based and, therefore, not considered to have a differential impact.</p>

<p>11. Are there concerns that the policy/procedure <u>could</u> have a differential impact on men and women? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?</p>
<p>The policy does not impact differentially on men and women.</p>
<p>12. Are there concerns that the policy/procedure <u>could</u> have a differential impact on disabled people? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?</p>
<p>The policy does not impact differentially on disabled people.</p>
<p>13. Are there concerns that the policy/procedure could have a differential impact on the grounds of sexual orientation? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?</p>
<p>The policy does not have a differential impact on the grounds of sexual orientation.</p>
<p>14. Are there concerns that the policy/procedure <u>could</u> have a differential impact on the grounds of age? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?</p>
<p>The policy does not have a differential impact on the grounds of age.</p>
<p>15. Are there concerns that the policy <u>could</u> have a differential impact on the grounds of religious belief? If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?</p>
<p>The policy does not have a differential impact on the grounds of religious belief.</p>
<p>16. Are there concerns that the policy <u>could</u> have a differential impact on any other groups of people eg those with dependants/caring responsibilities, those with an offending past, those with learning difficulties, transgendered or transsexual people. If yes, please explain. What existing evidence (either presumed or otherwise) do you have for this?</p>
<p>The policy does not have a differential impact on any other groups.</p>
<p>17. Are there any obvious barriers to accessing the service eg language, physical access?</p>
<p>The Core Strategy is available in various languages and Braille and can be inspected free of charge at a variety of locations across the District that are accessible to the disabled. A charge is made for the document which may be a barrier, however, this is in accordance with the Council's policy on charging.</p>
<p>18. Where do you think improvements could be made?</p>
<p>Information on alternative formats for the document could be moved from the back cover to a more visible position.</p>
<p>19. Are there any unmet needs or requirements that can be identified that affect specific groups. If yes, please give details.</p>
<p>No unmet needs or requirements can be identified that affect specific groups.</p>

<p>20. Is there a complaints system?</p> <p>There is not a specific complaints system for the Core Strategy. The process for preparing Development Plans is set out in Government planning regulations. This provides the opportunity for third parties to be consulted on draft policies and proposals, to make representations and to have those representations considered by an independent Planning Inspector at examination. In the event that a person feels prejudiced that the statutory processes were not followed, they have the right to apply to the High Court to remedy the injustice.</p> <p>The Council's corporate complaints system would also apply.</p>
<p>21. Do we monitor complaints by race, gender, disability, age, sexual orientation, religious belief?</p> <p>There are no direct complaints about this document. Monitoring of representations to the document is not undertaken but there may be the opportunity to request such information on future representation forms.</p>
<p>22. Do we have feedback from managers or frontline staff?</p> <p>Consultation with relevant managers and officers in the authority has taken place throughout the document preparation.</p>
<p>23. Is there any feedback from voluntary/community organisations?</p> <p>Consultation was undertaken in accordance with the adopted Statement of Community Involvement, which sets out standards for involving different groups in the document preparation. Voluntary and community organisations were actively involved in the preparation of Issues & Options stage of the strategy and then they were consulted during each following stage of the documents creation. Where feedback has been provided this has been taken into account in revising the Core Strategy policies. However, this needs to be balanced against the representations made by other third parties and within the limitations imposed by national and regional planning guidance.</p>
<p>24. Is there any research or models of practice that may inform our view?</p> <p>The Core Strategy is prepared in accordance with statutory guidance presented in Planning Policy Statement 12, good practice guidance provided by the Planning Advisory Service and the experience of similar authorities nationally.</p>
<p>25. Could the differential impact identified in 8 – 16 amount to there being unlawful discrimination in respect of this policy/procedure?</p> <p>N/A</p>
<p>26. Could the differential impact identified in 8-16 amount to there being the potential for adverse impact in this policy/procedure?</p> <p>N/A</p>
<p>27. Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or any other reason?</p> <p>N/A</p>

28. Should the policy proceed to a full impact assessment?	
No.	
29. Date on which Full assessment to be completed by	
N/A	
Signed (Lead Officer): ...	Date:

