

MID SUSSEX DISTRICT COUNCIL

Equality Impacts Assessment (EqIA) – September 2019

Title of Policy/Service/Contract:

Draft Mid Sussex Site Allocations Development Plan Document (Regulation 18)

Division: Planning Policy and Economic Development

Lead Officer: Jacob Lane

Date Assessment completed: 26/9/19

1. Scoping

1.1 What are the aims of the policy, service/service change or contract?

The Mid Sussex District Plan 2014-2031, adopted in March 2018, sets out a commitment for the Council to prepare a Site Allocations Development Plan Document (DPD), which has four main aims, which are:

- i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv) to set out additional Strategic Policies necessary to deliver sustainable development.

The document subject to EqIA is a 'draft' of the Council's emerging Site Allocations DPD. The DPD will be published for six weeks consultation to allow interested members of the public, Town or Parish Councils and other interested stakeholders and organisations to provide any comments to assist in the preparation of the document.

Following consultation on the draft document, the comments will be considered by the Council and will help to inform the next stage of preparing the plan, which is expected to be published in May 2020 for further consultation before being submitted to Government later in 2020.

The results of this EqIA have been considered during the production of the draft plan and are used to inform a Community Involvement Plan that sets out how and when consultation of the draft DPD will be undertaken.

1.2 Who does the service/policy/contract affect? Who are the main customers (internal or external)?

The policies contained within the DPD have the potential to affect current and future residents, workers and visitors to Mid Sussex and also those nearby, who are outside the administrative boundaries of the District but may still be impacted by planning policies in Mid Sussex.

The main customers of the DPD are expected to be:

- Council Officers;

- Members of the public;
- District, Town and Parish Councillors;
- Those involved in the development industry such as developers, landowners, agents;
- Organisations and individuals that provide services to residents and organisations;
- Organisations and individuals that represent groups of people.

1.3 What equality information is available, including any evidence from engagement and analysis of use of services?

In the adopted Mid Sussex District Council Statement of Community Involvement (SCI) (2019), the Council commits to 'front load' consultation activity, to identify potential issues and options. Stakeholder engagement has been sought from the very start of the process of producing the DPD. This work has assisted in the formulation of policies, and has informed and updated the evidence base.

Early engagement with stakeholders has been sought from the very start of the process of producing the Site Allocations DPD, including:

- Oversight of the DPD's preparation has been led by elected Councillors through the Site Allocations Document Members Working Group.
- Town and Parish Councils have been briefed and consulted in relation to the Strategic Housing and Employment Land Availability Assessment (SHELAA) and methodology for the site selection.
- A Developers Liaison Group, which includes representatives from across the development industry, was also established and consulted in relation to the SHELAA and methodology for site selection.
- Neighbouring Local Authorities and County Authorities; as a result, the District Council has been able to enter into Statements of Common Ground (SoCGs) with neighbouring authorities.
- External organisations, such as the High Weald AONB Unit. It is the Council's intention to invite relevant public bodies to enter into SoCGs.
- Consulting other statutory consultees, such as Historic England, the Environment Agency and Natural England.

There has also been extensive engagement with internal MSDC officers, including:
 Officers from both Planning Policy and Economic Development, and Development Management;
 Urban Designer;
 Sustainability Officer;
 Heritage Officer;
 Tree Officer;
 Housing Services;
 Waste and Outdoor Services;
 Community Services, Policy and Performance.

There has also been consultant work commissioned to support the evidence base of the DPD in relation to transport, air quality, HRA and viability.

1.4 What does this information tell us about the equality issues associated with the service and implications for the protected groups?

Consultation with these groups has ensured a broad range of opinions have input into the production of the DPD at an early stage. There have been no particular issues raised in relation to equalities impacts of the DPD.

The upcoming public consultation provides an excellent opportunity for wider input from a more diverse range of voices, ensuring the final document is responsive to the needs of all groups in society.

Responses to the consultation will provide a valuable source of information which will inform the final policies. All representations received through the consultation will be carefully reviewed by officers. A consultation report summarising the issues raised by consultation and how these comments have been used will be published on the Council's website and will be considered by the Council before the next stage in the plan-making process.

The consultation will be open to all and should seek to inform and receive comment from the widest possible range of people, including the protected groups, by using a variety of consultation methods.

More information on the consultation will be available in the Community Involvement Plan which accompanies the DPD. This document will detail how and when the consultation will be undertaken. Importantly, the Community Involvement Plan will be informed by the findings of the following assessment to ensure there are no barriers preventing the involvement of protected groups, and where necessary, provision is made to support involvement.

1.5 Are contractors or partnerships used to deliver the service? No

If No go to section 2.

If yes, please refer to the guidance notes, particularly Appendix One of the MSDC Guidance "Integrating Equality and Diversity into Procurement", and complete the next three questions.

Identify the contractors/partnerships used to deliver the service.

What is their contribution to equality in service delivery and the promotion of equality?

How are equality issues addressed through contractual arrangements and service level agreements?

2. Assessment of Impacts: Analysis and Action Planning

This assessment considers the impact of both the proposed content of the DPD and the consultation. Opportunities have been identified, where it is anticipated that the DPD may be able to promote equality, good relations and/or address barriers to service/differential impact. The current practices and resources available for addressing the opportunities are assessed, and then where necessary, further actions are identified where the DPD may be able to take action to support the identified equalities objective.

This assessment will be reviewed, and if necessary revised, for each stage of the DPD.

Further to the assessment below, it should be noted that although the Site Allocations DPD provides few specific opportunities for particular protected groups resulting in further actions, but as a whole, the document supports the promotion of equality, good relations and the removal of barriers to services for all in Mid Sussex due to intentions of the document to support the delivery of housing to meet the District's identified housing need.

Housing plays an important role in community cohesion; homes, and the communities which they belong to, directly influence our access to key social and economic opportunities and they affect our wellbeing. The implementation of the DPD should support the delivery of new homes to meet the District's identified housing need, ensuring that everyone has the opportunity to live in a home suitable for their needs and which they can afford. The realisation of this objective will benefit a variety of different people in Mid Sussex, and should have a positive impact upon the protected groups by providing housing to suit a range of needs.

The introduction of specific planning policies to address the housing needs of protected groups has been considered through the production of the Site Allocations DPD, particularly in relation to housing for older people. However, it is considered that current development plan policies are robust enough to protect the needs of such groups at this moment in time. This will be subject to on-going consideration, and will face particular scrutiny when the District Plan is next reviewed.

Opportunity for DPD to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these, including existing policies and consultation best practice	Further actions required by the DPD and timescales	Lead Officer	How will impact be measured
The needs of different ethnic groups including white minorities, but also established white communities				
<p>The DPD has no identified impacts upon particular needs of different ethnic groups.</p> <p>Note that engagement methods must be responsive of potential barriers that exist for those where English is not their first language.</p>	<p>Engagement with representative organisations.</p> <p>A translation service is provided by the Council.</p> <p>Implementation of existing District Plan Policy, <i>DP33: Gypsies, Travellers and Travelling Showpeople</i>, aims to ensure that a sufficient amount of permanent culturally suitable housing for settled Gypsies, Travellers and Travelling Showpeople is</p>	None identified.	-	-

	delivered to meet identified needs within an appropriate timescale.			
The needs of men and women, including taking account of pregnancy and maternity				
<p>The DPD has no identified impacts upon particular needs of men and women.</p> <p>Note that engagement methods must be accessible to those who are expecting and those with very young babies to ensure that this is not a barrier to engagement and to ensure that they can positively input into the plan-making process.</p>	<p>Implementation of existing District Plan Policy Policy, <i>DP26: Accessibility</i> helps meet the access needs of not only older and disabled people, but of the whole community, including parents with pushchairs.</p> <p>Consultations of all planning documents aim to be open to all and accessible to pregnant women and those with young children to ensure that this is not a barrier to engagement; there are always multiple ways of viewing planning documents and responding to consultations. The document will be available to view digitally, on the Mid Sussex District Council website, and hard copies will be available to view at deposit points around the District.</p>	None identified.	-	-
The needs of disabled people				
<p>To provide the policy framework to ensure:</p> <ul style="list-style-type: none"> - That there is adequate provision of community facilities and local services, and Infrastructure; - The location and design of development is accessible to all including open spaces, the public realm and transport infrastructure. <p>Note that engagement methods must be accessible to disabled people to ensure that disability is not a barrier to engagement.</p>	<p>Engagement with Access Groups.</p> <p>Implementation of existing District Plan policies on design, accessibility, transport, community facilities and local services, infrastructure and housing mix aim to ensure development is responsive to the needs of disabled people.</p> <p>Implementation of existing Development Infrastructure and Contributions SPD sets out a requirement for accessible and adaptable dwellings in both market and affordable housing, and identifies the Building Regulations standards these dwellings should meet.</p> <p>The consultation processes of all planning documents aim to be open to all and accessible disabled people.</p>	Implement DPD policies on housing site allocations within the identified indicative phasing period to ensure development is responsive to the needs of disabled people, including in regards to design, accessibility, transport, community facilities and local services, infrastructure and housing mix.	Jacob Lane	Monitor in line with the DPD Monitoring Schedule.

	<p>Supporting material is made available on the website which is equipped with 'browse aloud' for those with visual impairments.</p> <p>Consideration given to font size and design layout.</p> <p>Documents written in plain English and terminology used explained in the clearest possible terms.</p> <p>Officers are available to explain the process in person, over the phone and via email.</p>			
The needs of people with a religion or belief				
None identified at this time.	Existing District Plan policies on community facilities and local services and infrastructure.	None identified at this time.	-	-
The needs of gay men, lesbians, bisexuals and heterosexual people				
None identified at this time.	None identified at this time.	None identified at this time.	-	-
Issues from marriage and civil partnership				
None identified at this time.	None identified at this time.	None identified at this time.	-	-
The needs of different age groups, for example older and younger people				
<p>To provide the policy framework to ensure:</p> <ul style="list-style-type: none"> - A suitable housing offer is provided, including affordable housing, particularly in rural locations, to enable people to continue to live in suitable accommodation in their locality. For instance, there are barriers to younger people getting on the housing ladder and to older people who cannot 'downsize' and/or move into more suitable local accommodation. - That there is adequate provision of community facilities and local services, and infrastructure. - That the location and design of development is accessible to all including open spaces, the public realm and transport infrastructure. - The provision or improvement of community facilities and local services. 	<p>Engagement with representative organisations.</p> <p>Implementation of existing District Plan policies on affordable housing, design, accessibility, transport, community facilities and local services, infrastructure and housing mix.</p> <p>Consultations of all planning documents aim to be open to all and accessible to people of all ages; there are always multiple ways of viewing planning documents and responding to consultations. The document will be available to view digitally, on the Mid Sussex District Council website, and hard copies will be available to view at deposit points around the District.</p> <p>Supporting material is made available on</p>	<p>Implement DPD policies on housing site allocations within the identified indicative phasing period to ensure development is responsive to the needs of different age groups, including in regards to design, accessibility, transport, community facilities and local services, infrastructure and housing mix.</p>	Jacob Lane	Monitor in line with the DPD Monitoring Schedule.

<p>Note that different age groups may engage with the consultation process in different ways. Consideration should be given to engaging with people of different age groups to ensure that they can positively input into the plan-making process.</p>	<p>the website which is equipped with 'browse aloud' for those with visual impairments.</p> <p>Consideration given to font size and design layout.</p> <p>Documents written in plain English and terminology used explained in the clearest possible terms.</p> <p>Officers available to explain the process in person, over the phone and via email.</p>			
<p>The needs of transgender communities</p>				
<p>None identified at this time.</p>	<p>None identified at this time.</p>	<p>None identified at this time.</p>	<p>-</p>	<p>-</p>
<p>The needs of people who are disadvantaged by socio-economic factors such as low incomes, skill or living in a deprived area</p>				
<p>To provide the policy framework to ensure:</p> <ul style="list-style-type: none"> - The correct amount and distribution of housing and employment development to enhance the economic prosperity of all the district's towns and villages. - A suitable housing offer is provided, including affordable housing, to enable people to live in suitable accommodation and continue to live in their locality. - The integration of affordable housing with open market housing. - That there is adequate provision of community facilities and local services, and infrastructure. - That the location and design of development is accessible to all including open spaces, the public realm and transport infrastructure. - The provision or improvement of community facilities and local services. <p>Note that engagement methods must be accessible to those who are disadvantaged by their socio-economic background to ensure that they can positively input into plan-making process.</p>	<p>Engagement with voluntary services, registered social landlords and the business community.</p> <p>Implementation of existing District Plan policies on housing, including affordable housing and housing mix, and economic development that provide for a range of employment types, community facilities and local services and infrastructure, accessibility and transport.</p>	<p>Implement DPD policies on housing site allocations within the identified indicative phasing period which aim to support the provision of homes for people from all backgrounds in the District, and employment site allocations that aim to improve employment opportunities in the district and support the local economy.</p>	<p>Jacob Lane</p>	<p>Monitor in line with the DPD Monitoring Schedule.</p>

The needs of people who live in a rural area				
<p>To provide the policy framework to ensure:</p> <ul style="list-style-type: none"> - The correct amount and distribution of housing development to enhance the economic prosperity of all the district's villages. - A suitable housing offer is provided in rural locations, including affordable housing, to enable people to live in suitable accommodation and continue to live in their locality. - The integration of affordable housing with open market housing where possible. - That there is adequate provision of community facilities and local services, and infrastructure. - That the location and design of development is accessible to all including open spaces, the public realm and transport infrastructure. - The provision or improvement of community facilities and local services. 	<p>Engagement with Parish Councils, representative groups and local communities.</p> <p>Implementation of existing District Plan Policy <i>DP32: Rural Exception Sites</i> allows for the provision of rural exception sites, and <i>DP1: Sustainable Economic Development</i> allows for new small scale economic development in the countryside.</p>	<p>Implement DPD policies on housing site allocations within the identified indicative phasing period that support sustainable development in rural locations.</p>	<p>Jacob Lane</p>	<p>Monitor in line with the DPD Monitoring Schedule.</p>

3. Mid Sussex District Council Equality Impacts Assessment Summary

Key findings	Future actions
<p>Existing engagement methods are responding to needs of protected groups.</p> <p>Consultations are managed to ensure that engagement reaches as wide as possible audience, including protected groups.</p> <p>The DPD has the opportunity to provide site specific policies that aim to create safe and attractive places that are responsive to the needs of all, including protected groups.</p> <p>In regards to the protected groups, the consultation of and policies in the DPD have no identified negative impacts that are not remedied through future actions.</p>	<p>Continued promotion of consultation exercises that are inclusive of all, engagement with representative organisations and monitoring of consultation.</p> <p>Continue to implement existing District Plan policies which respond to the needs of protected groups.</p> <p>Implement DPD policies which aim to support the provision of homes to meet the identified housing need for Mid Sussex.</p> <p>Monitor delivery of site allocations in order to assess their effect on the needs of protected groups.</p>