

## APPENDIX 2

### MID SUSSEX DISTRICT COUNCIL

#### Equality Impact Assessment

**Title of Policy/Service/Contract:**

Equalities Impact Assessment for public consultation on the draft Mid Sussex Design Guide SPD.

**Division:** Planning Policy and Economic Development

**Lead Officer:** Alma Howell

**Date Assessment completed:** 5<sup>th</sup> July 2019

#### 1. SCOPING

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

Mid Sussex District Council has prepared a Design Guide Supplementary Planning Document (SPD) to supplement a specific design policy in the Mid Sussex development plan (District Plan policy DP26: Character and Design), as well as other policies that are related to design. The SPD will inform and guide the quality of design for all development in the District.

The SPD provides guidance on policies which have already been adopted in the Mid Sussex District Plan 2014-2031. It does not provide new policies but rather provides guidance that sets out in more detail how the policies in the District Plan should be implemented.

The aims of the SPD are to ensure that the Council's guidance on design:

- Complies with all relevant and current national planning policy and guidance, and with policies in the District Plan;
- Provides guidance which is fit for purpose and which will support the District Plan over the Plan period; and
- Establishes principles and standards for new development in the District that aim to create safe and attractive places that are sensitive to Mid Sussex's special character while also allowing creative and innovative design solutions.

There are parts of the Guidance that have particular impacts for the protected groups.

The results of this Assessment will be used to inform the Community Involvement Plan that will detail the consultation arrangements with stakeholders and the community.

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

The SPD is based upon the policies contained within the District Plan, which have the potential to affect anyone who lives, works or visits Mid Sussex.

The main users of the SPDs are likely to be:

- Those involved in the development industry such as developers, house builders, architects, landowners, agents;
- Development Management Officers
- District, Town and Parish Councillors
- Members of the public;
- Organisations and individuals that represent groups of people;
- Internal customers including those service areas responsible for decisions that require consultation such as the Housing Department.

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

The SPD is based on the policies contained within the District Plan, which has been subject to its own Equalities Impact Assessment. The SPD will be the subject of full public consultation. A Community Involvement Plan, informed by the results of this Assessment, will detail how the consultation will be undertaken.

There has been early engagement with others during the production of this SPD, providing a range of expertise and advice.

These include:

A Member Workshop comprising Councillors;  
The Council's Design Review Panel, comprising local architects;  
West Sussex County Council officers giving advice on trees and transport issues, which have significant implications in regards to accessibility.

As well as internal Council officers, including:

Planning Officers from both Planning Policy and Development Management;  
Urban Designer;  
Sustainability Officer;  
Tree Officer;  
Housing Services;  
Waste and Outdoor Services;  
Community Services, Policy and Performance.

### **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 board range of opinions have input into the production of the SPD at an early stage.

The upcoming public consultation will also improve the Council's ability to receive input from an even more diverse range of voices, ensuring the final document is responsive to the needs of all groups of society.

The document will be available to view digitally, on the Mid Sussex District Council website, and hard copies will be available to view at the Council Offices. The Council will also be directly reaching out for responses to the consultation by utilising the Planning Policy Updates database which includes over 400 subscribers, who will receive notification and further information about the consultation.

Mid Sussex District Council has identified a number of hard to reach groups, and these groups are included in this database.

**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 Impact: Analysis and Action Planning

Any gaps in information or provision, opportunities to promote equalities and good relations identified above need to be translated into SMART actions and recorded here. These actions need to be delivered and monitored through the service planning process.

Please note, the Design Guide SPD principles noted in this assessment are included in full at the end of this document.

| Opportunity to promote equality, good relations and/or address barriers to service/differential impact   | Current action taken to address these   | Further actions required and timescales  | Lead Officer | How will impact be measured |
|--|---|--|--------------|-----------------------------|
| <b>The needs of different ethnic groups including white minorities, but also established white communities</b>   |   |  |              |                             |
| <p>The SPD should provide design guidance which encourages new development to be responsive to the needs of all sectors of society, including ethnic groups.</p> <p>The public consultation included in the preparation of the SPD will be responsive to needs of all ethnic groups.</p> | <p>Consultation with representative organisations.</p> <p>A translation service is provided by the Council.</p> <p>District Plan Policy, DP33: Gypsies, Travellers and Travelling Showpeople, aims to ensure that a sufficient amount of permanent culturally suitable housing for settled Gypsies, Travellers and Travelling Showpeople is delivered to meet identified needs within an appropriate timescale.</p> | <p>Implement the Design Guide SPD:</p> <p><i>Principle DG29: Design for everyone and look to the future.</i></p> <p><i>Principle DG34: Promote a mix of uses within larger schemes to provide services to meet local needs, conveniently located where they are most accessible.</i></p> <p><i>Principle DG35: Promote a mix of residential typologies within residential schemes to create mixed communities and ensure these are adaptable to change</i></p> <p><i>Principle G43: Provide attractive and usable external space for all</i></p> | Alma Howell  | Monitoring where possible.  |
| <b>The needs of men and women, including taking account of pregnancy and maternity</b>   |   |  |              |                             |
| <p>The SPD will provide design guidance which encourages new development to be responsive to the needs of men and women.</p> <p>The public consultation included in the preparation of the SPD should be responsive to needs of men and women.</p>                                       | <p>The consultation processes of all planning documents are open to all and 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>Implement the Design Guide SPD:</p> <p><i>Principle DG29: Design for everyone and look to the future.</i></p> <p><i>Principle DG34: Promote a mix of uses within larger schemes to provide services to meet local needs, conveniently located where they are</i></p>  | Alma Howell  | Monitoring where possible.  |

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|  |  | <p><i>most accessible</i></p> <p><i>Principle DG35: Promote a mix of residential typologies within residential schemes to create mixed communities and ensure these are adaptable to change</i></p> <p><i>Principle DG43 Provide attractive and usable external space for all</i></p> <p>The document will be available to view digitally, on the Mid Sussex District Council website, and hard copies will be available to view at the Council Offices.</p>  |                           |                                   |
| <b>The needs of disabled people</b>  |  |   |                           |                                   |
| <p>The SPD should provide design guidance which encourages new development to be responsive to the needs of disabled people.</p> <p>The public consultation included in the preparation of the SPD should be responsive to needs of disabled people.</p> | <p>Liaison with Access Groups.</p> <p>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>The 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>Supporting material is made available on the website which is equipped with 'browse aloud' for those with visual impairments.</p> <p>The consultation processes of all planning documents are open to all and accessible to the needs of disabled people.</p> <p>Consideration given to font size and design layout.</p> | <p>Implement the Design Guide SPD:</p> <p><i>Principle DG19: provide attractive streets and spaces defined by buildings rather than the highway, that encourage low speeds and that are safe to use by everyone</i></p> <p><i>Principle DG29: Design for everyone and look to the future.</i></p> <p><i>Principle DG34: Promote a mix of uses within larger schemes to provide services to meet local needs, conveniently located where they are most accessible</i></p> <p><i>Principle DG35: Promote a mix of residential typologies within residential schemes to create mixed communities and ensure these are adaptable to change</i></p> <p><i>Principle G43 Provide attractive and usable external space for all</i></p> | <p><b>Alma Howell</b></p> | <p>Monitoring where possible.</p> |

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|  | <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>  | <p>The document will be available to view digitally, on the Mid Sussex District Council website, and hard copies will be available to view at the Council Offices.</p>   |                           |                                   |
| <b>The needs of people with a religion or belief</b>   |   |  |                           |                                   |
| None identified.   |   |  |                           |                                   |
| <b>The needs of gay men, lesbians, bisexuals and heterosexual people</b>   |   |  |                           |                                   |
| None identified.   |   |  |                           |                                   |
| <b>Issues from marriage and civil partnership</b>  |   |  |                           |                                   |
| None identified.   |   |  |                           |                                   |
| <b>The needs of different age groups, for example older and younger people</b>   |   |  |                           |                                   |
| <p>The SPD should provide design guidance which encourages new development to be responsive to the needs of all age groups.</p> <p>The public consultation included in the preparation of the SPD should be responsive to needs of different age groups.</p> | <p>Liaison with representative organisations.</p> <p>Mid Sussex District Council has identified a number of hard to reach groups, and these groups are included in this database, who will be notified of the consultation on the SPDs.</p> <p>The draft SPDs will be published on the Mid Sussex District Council website, and will be available in the deposit points, including the main libraries, around the District.</p> <p>Supporting material is made available on the website which is equipped with 'browse aloud' for those with visual impairments.</p> <p>Consideration has been 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>Implement the Design Guide SPD:</p> <p><i>Principle DG27: Integrate space for play into the design</i></p> <p><i>Principle DG29: Design for everyone and look to the future.</i></p> <p><i>Principle DG31: Optimise the development potential of sites to deliver homes and new employment in the most sustainable locations</i></p> <p><i>Principle DG34: Promote a mix of uses within larger schemes to provide services to meet local needs, conveniently located where they are most accessible</i></p> <p><i>Principle DG35: Promote a mix of residential typologies within residential schemes to create mixed communities and ensure these</i></p> | <p><b>Alma Howell</b></p> | <p>Monitoring where possible.</p> |

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|   | Officers are available to explain the process in person, over the phone and via email.  | <p><i>are adaptable to change</i></p> <p>The document will be available to view digitally, on the Mid Sussex District Council website, and hard copies will be available to view at the Council Offices.</p>   |                    |                            |
| <b>The needs of transgender communities</b>   |   |  |                    |                            |
| None identified.  |   |  |                    |                            |
| <b>The needs of people who are disadvantaged by socio-economic factors such as low incomes, skill or living in a deprived area</b>  |   |  |                    |                            |
| <p>The SPD should provide design guidance which encourages new development to be responsive to the needs of people who are disadvantaged by socio-economic factors.</p> <p>The public consultation included in the preparation of the SPD should be responsive to needs of people who live in a rural area.</p> | <p>Liaison with voluntary services, registered social landlords and the business community.</p> <p>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>Supporting material is made available on the website which is equipped with 'browse aloud' for those with visual impairments.</p> <p>Consideration has been 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> | <p>Implement the Design Guide SPD:</p> <p><i>Principle DG29: Design for everyone and look to the future.</i></p> <p><i>Principle DG31: Optimise the development potential of sites to deliver homes and new employment in the most sustainable locations</i></p> <p><i>Principle DG34: promote a mix of uses within larger schemes to provide services to meet local needs, conveniently located where they are most accessible</i></p> <p><i>Principle DG35: Promote a mix of residential typologies within residential schemes to create mixed communities and ensure these are adaptable to change.</i></p> <p><i>Principle DG41: Minimise environmental impact by energy efficient and sustainable design</i></p> <p><i>Principle G43: Provide attractive and usable external space for all</i></p> <p>The document will be available to view digitally, on the Mid Sussex</p> | <b>Alma Howell</b> | Monitoring where possible. |

|  |  |  |                    |                            |
|--|--|--|--------------------|----------------------------|
|  |  | District Council website, and hard copies will be available to view at the Council Offices.  |                    |                            |
| <b>The needs of people who live in a rural area</b>  |  |  |                    |                            |
| <p>The SPD should provide design guidance which encourages new development to be responsive to the needs of people who live in a rural area.</p> <p>The public consultation included in the preparation of the SPD should be responsive to needs of all ethnic groups.</p> | <p>Liaison with Parish Councils, representative groups and local communities.</p> <p>District Plan Policy DP32: Rural Exception Sites allows for the provision of rural exception sites.</p> <p>District Plan Policy DP1: Sustainable Economic Development allows new small scale economic development in the countryside.</p> | <p>Implement the Design Guide SPD:</p> <p><i>Principle DG31: Optimise the development potential of sites to deliver homes and new employment space in the most sustainable locations, reducing pressure on the countryside and the need to travel</i></p> <p><i>Principle DG54: Conversion of agricultural buildings</i></p> | <b>Alma Howell</b> | Monitoring where possible. |

### 3. Mid Sussex District Council Equality Impact Assessment Summary

| Key findings  | Future Actions   |
|---|--|
| <p>Engagement methods are suitable for seldom heard groups across the community</p> <p>The consultation will be managed to ensure that engagement reaches as wide as possible audience, including all groups</p> <p>The SPD establishes principles and standards for new development in the District that aim to create safe and attractive places that are responsive to the needs of all.</p> | <p>Promotion of consultation exercise, liaison with representative organisations and monitoring of consultation.</p> <p>Monitor design of new developments across the district in order to establish how these are used to meet the needs of a range of groups including the ethnic groups, elderly, gypsies and travellers, those with disabilities, the rural community, and people who are disadvantaged by socio-economic factors.</p> |

## Design Guide Principles

### **Principle DG19: Provide attractive streets and spaces defined by buildings rather than the highway, that encourage low speeds and that are safe to use by everyone**

Streets should be designed as social spaces with the needs of pedestrians, cyclists and public transport users put above the needs of the motorist.

Within larger developments a clear street hierarchy should be promoted with the principal vehicular routes integrated within the structure of development as main streets or boulevards with tree lined building frontages and not as peripheral distributor roads (bypasses).

Streets should be well defined and enclosed by building frontages normally in combination with a line of trees and landscaping.

Streets should encourage pedestrian movement through appropriate pavement widths, avoiding unnecessary barriers or clutter and providing places for pedestrians to rest, gather and socialise.

Residential streets should be designed to a maximum speed of 20 miles per hour. Traffic calming measures should be integrated within the design of the streets (and not as engineered solutions imposed afterwards) to encourage drivers to drive with care and caution.

### **Principle DG27: Integrate space for play into the design**

Children's play areas and equipment should normally be provided as part of new residential developments of 50 dwellings and above and on smaller developments when there are no existing nearby facilities. Play spaces should not be marginalised to the edge of developments but provided centrally in an accessible location where they are overlooked by surrounding properties.

Play spaces should provide a range of equipment suitable for the intended age group and integrated with natural landscape to enable contact with nature.

The national guidance on inclusive play, should be followed in Design for Play: A guide to creating successful play spaces (Play England, August 2008) and Public Space Lessons: Designing and planning for play (CABE, October 2008).

### **Principle DG29: Design for everyone and look to the future**

The public realm should be designed so that it:

- Reflects the diversity of people using spaces;
- Is convenient, safe and easy to use for all people without having to experience undue effort, barriers to access or separation;
- Enables everyone to participate equally, confidently and independently in everyday activities irrespective of a person's mobility, age, gender or ethnicity;
- Meets the needs of wheelchair users, mobility impaired people and people with pushchairs;
- Encourages social interaction and does not purposely design-out the activities of young people or other groups; and
- Provides sensory richness.

In particular applicants should:

- Ensure that street furniture, signage, lighting and visual and textural contrast in the paving materials are carefully designed and reflect the needs of all potential users; and
- Provide sufficient levels of accessibility for all potential users in terms of accessible parking, pavement space and access to public transport.

### **Principle DG31: Optimise the development potential of sites to deliver homes and new employment space in the most sustainable locations, reducing pressure on the countryside and the need to travel**

New development should generally respond to the scale, massing and grain of adjacent areas and the settlement context within which it is located.

However in some parts of the District there may be an opportunity to deliver a new development character provided this is part of a comprehensive vision, establishes sense of place and does not impact on the sensitive townscape or landscape assets of an area.

In particular there are opportunities to:

- Promote development of a greater intensity in Mid Sussex's three town centre locations within areas identified as being coarse grain (refer to Section 2.5 of this Design Guide);
- Promote development of a greater intensity in the most accessible parts of new urban extensions where this does not adversely impact on existing homes / character and the rural edge; and
- Intensify and increase the efficiency of employment sites (as identified in Section 2.5 of this Design Guide).

Increased scale and density of development should be restricted to areas where there is good accessibility to shops and services and to public transport in order to minimise the need to travel.

Schemes of greater density should promote green travel options including reduced parking provision, provision of car club spaces and improved public transport provision.

**Principle DG34: Promote a mix of uses within larger schemes to provide services to meet local needs, conveniently located where they are most accessible**

Larger proposals will normally require a range of local services and facilities to be incorporated. The viability and vitality of these uses will depend on the existing and proposed catchment.

The location of mixed-use centres and neighbourhood hubs is key to their viability and long-term success.

Mixed-use centres should:

- Be conveniently located at the intersection of well-connected streets;
- Be highly visible;
- Cluster a mix of facilities around an appropriately scaled high quality public realm or public space as a central focus with buildings serving to enclose the space;
- Include residential development within the mix above non-residential uses to ensure activity and surveillance throughout the day and night;
- Wrap and conceal the non-active parts of larger nonresidential buildings (such as supermarkets or leisure buildings) within blocks with a perimeter of active development;
- Locate servicing areas where they do not visually dominate the streetscene and avoid dead frontage overlooking the public realm;
- Be accessible for all users, with particular consideration given to how the elderly and disabled will access and use the centre;
- Provide short stay / visitor and disabled car parking spaces and secure cycle parking integrated into the streetscape or landscape design with convenient access to capitalise on passing trade. The appropriate number, location and layout will depend on the local context; and
- Be served by a frequent bus route with bus stops conveniently located and well-overlooked to encourage patronage.

**Principle DG35: Promote a mix of residential typologies within residential schemes to create mixed communities and ensure these are adaptable to change**

Applicants should promote development that provides a mix of dwelling types (including apartments and terraced homes) and tenures to meet local need as identified in District Plan Policies DP30: Housing Mix and DP31: Affordable Housing.

Applicants should agree this mix through discussion with the Council.

Affordable housing should be 'pepper-potted' throughout the site, and have the same external appearance and quality of finishes as private housing.

Buildings should be designed so that they can be altered internally or externally over time without the need for demolition or rebuilding as needs change. Very narrow fronted buildings are unlikely to be easily altered or extended. By building flexible internal space, rooms can be adapted to different uses depending on family requirements.

Buildings should be designed to maximise the potential for lifetime use. Refer to Lifetime homes guidance for further details.

<http://www.lifetimehomes.org.uk/>

New residential developments should address the needs of people with disabilities by complying with Building Regulations. This requires reasonable provision to be made for people with disabilities to gain access to and to use buildings.

Wheelchair accessible homes should be designed in accordance with recognised guidance such as Wheelchair Housing Design Guide (Habinteg, 2006). These homes should be positioned in highly accessible locations.

#### **Principle DG41: Minimise environmental impact by energy efficient and sustainable design**

The Council is committed to sustainable design and construction and all development must be designed so that the use of resources and energy are minimised both through building construction and on completion.

Applicants must demonstrate how this has informed their design and must consider in particular:

- Orientation and design of buildings to maximise daylight and sun penetration, whilst also avoiding overheating;
- The use of green roofs or walls to reduce storm water run off, increase soundproofing and biodiversity;
- The use of materials with low embodied energy or, where possible recycled materials (for example re-use of existing concrete as road fill or in foundations);
- The use of materials with a high thermal mass, such as stone or brick, which store heat and release it slowly;
- The use of photovoltaics or solar thermal water heating;
- The use of ground or air source heat pumps for heating; and
- The use of low flow technology in water fittings, rainwater harvesting systems and grey water recycling systems to reduce water consumption.

#### **Principle DG43: Provide attractive and usable external amenity space for all homes**

All dwellings should have access to private outdoor amenity space. This open space should be appropriate to both the location of the proposal and the type and size of accommodation and it should be located where it is not subject to continuous overshadowing.

Amenity space should be provided in the form of a private garden, patio or balcony, depending on the type of dwellings being provided. Where no private gardens are proposed private communal gardens should be provided. Private gardens should be treated as an extension of the living space of the house. External access to rear gardens should be provided. Long, narrow alleyways should be avoided.

Communal gardens should be incorporated to the rear of blocks to provide visual amenity and outdoor space for residents. Soft landscaping should be prioritised over areas of hard standing and consideration should be given to provision of outdoor seating, eating, drying and growing space.

Ground floor homes in apartment blocks should have access to a well defined, rear, private area. This will act as 'defensible space' and create good quality amenity.

Residents living in upper floor apartments should have access to a balcony which is large enough to be enjoyed. Balconies should be positioned to ensure they do not cause overlooking of neighbouring properties.

#### **Principle DG54: Conversion of agricultural buildings**

The primary objective of all conversions of agricultural buildings must be to retain the character and appearance of the original building. Where conversion to residential uses is proposed this may require compromises in terms of the residential layout and the provision of natural light into all habitable rooms.

The introduction of conspicuous domestic features such as chimneys, satellite dishes, aerials, porches and additional window or door openings tend to be out of character with the original building and, wherever possible, such features should be avoided. Natural light can be provided by introducing glass roof tiles, glass insertions into honeycomb brickwork and slit windows.

Existing openings in elevations can be used for windows or doors, and to 'borrow' light into the more central parts of the building. A simple window design is usually most appropriate. Internal walls should be retained where ever practically possible and the introduction of additional walls kept to a minimum. Timber roof trusses should be retained and not cut or removed to provide head height at first floor level.

Dis-proportionately large extensions or ancillary buildings are not usually appropriate for conversions. Such elements can dominate the original building and so detract from its character. Residential type features such as conservatories should be avoided. Wherever possible, existing ancillary buildings should be used as garaging to avoid the need for new buildings. Conversions should not subdivide historic farmyards.

Landscaping and boundary treatments need careful attention and should be designed to be as simple as possible. Hard and soft landscaping should be kept informal, and walls, fences, kerbing and any other urban features should be avoided where they would harm the building's agricultural character or farmyard setting.

A structural report will need to be submitted with any planning application to demonstrate that the building is capable of conversion without substantial rebuilding or extension.