

Equalities Impact Assessment:

Draft Thanet Local Plan



Title	Draft Thanet Local Plan (Submission stage, Reg 22)
Service, Portfolio & Ward	Strategic Planning - Local Plan portfolio - all Wards
Date of review	2015 – (to adoption)
Lead officer	Adrian Verrall – Strategic Planning Manager
Project Team	Jo Wadey, Laura Smith, Sarah Parker

Screening of the Local Plan Strategic Priorities & Objectives

Strategic Priority 1 – Create additional employment and training opportunities to strengthen and diversify the local economy and improve local earning power and employability.

Strategic Priority 2 – Facilitate the continued regeneration of the coastal town centres, developing their individual niche roles, while also consolidating the role and function of Westwood as Thanet’s primary retail centre, ensuring retail expenditure is retained in the district.

Strategic Priority 3 – Provide homes that are accessible to, and suited to the needs and aspirations of, a settled and balanced community.

Strategic Priority 4 – Safeguard local distinctiveness and promote awareness, responsible enjoyment, protection and enhancement of Thanet’s environment including the coast, countryside, rich seaside heritage, historic environment, diverse townscapes and landscape, biodiversity and water environment.

Strategic Priority 5 – Deliver the infrastructure required to support existing communities and new development, including an efficient and effective transport system.

The Local Plan Strategic Priorities and policies were informed by a significant level of data (which can be found on the evidence pages of the Council’s website: <https://www.thanet.gov.uk/services/evidence-base/>)

The priorities have been designed to provide for all Thanet residents but it was agreed that the protected characteristics of: age, race, disability would require closer analysis within the context of the ‘top level’ strategic priorities and proposals. This is based on a broad analysis of the local population, age structure and health issues in the area. Although not a ‘protected characteristic’ socio-economic issues would also form part of the analysis as being a significant issue for the district. Thanet has been identified for some years as an area experiencing issues of multiple deprivation in some areas, which affect people’s quality of life and opportunities.

It was further agreed that due to the ‘top level’ nature of the strategic priorities and proposals a screening approach would be taken and a more in depth analysis of the development management policies would be conducted by the Strategic Planning team members (in their area of expertise) as these analyses would drill into greater detail.

Policy SP01 is designed to ensure that new development fully meet its infrastructure requirements, whether directly on site or by contribution to that provision elsewhere, and to comply with the provisions of the draft Infrastructure Delivery Plan, in terms of provision of physical and social infrastructure. While this policy does not in itself deliver specific infrastructure, it outlines the mechanisms for delivering key infrastructure to

support development and therefore meet the strategic priorities and policies set out in the draft Plan.

Economic Strategy

Relevant to: age, disability and socio-economic

Policies SP02 – SP04 have been designed to create employment opportunities for the Thanet population. Access to employment sites was discussed and it was agreed that employment sites that fell outside of urban areas should be served by accessible transport links to ensure that disabled residents and those without the means to buy a personal car have fair and equitable access to employment opportunities created on these sites. SP04 (2) makes direct reference to transport links in relation to Manston Business Park. Policy SP02 encourages employment growth in a range of sectors suiting all levels of educational attainment and ability.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination: by providing suitable transport links to employment sites for those with disability and those unable to afford a personal car.

Advance Equality of Opportunity: by seeking suitable transport links the council is actively seeking to remove barriers to employment that may be experienced by people with disability or no access to personal transport.

Foster Good Relations (promoting understanding): by identifying issues around accessibility and writing policy statements that seek to mitigate negative impacts the council seeks to raise awareness and understanding of the barriers that some people face when seeking employment.

Town Centre Strategy

Relevant to: age, disability and socio-economic

Policies SP06 – SP10 seek to support Thanet's town centres and understand how their services interrelate with one another. It supports their success and viability by identifying different opportunity areas and encouraging diversification and regeneration. The group discussed issues of accessibility of Westwood and traffic flows around the site. Kent County Council has commenced the 'Westwood Relief Scheme' that provides those travelling in the Westwood area, alternative routes to the former Pearce Signs roundabout. This would ultimately facilitate a more pedestrian friendly environment and improve public transport provision in the area.

The group also discussed the role of all town centres in the district and the desire to attract convenience stores to the towns in order to support localised trade that would serve the resident populations. This would provide nearby shopping facilities and employment opportunities for all age groups in an easily accessible location.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination and Advance Equality of Opportunity: by providing shopping facilities and employment opportunities for all ages in an easily accessible location.

Foster Good Relations (promoting understanding): by ensuring through policy that that shops and services are focused in a network of town centres. These hubs of the community promote the ability to fully engage in society. Primary and secondary shopping frontages are defined to direct footfall to the most centralised area of town putting goods and services in accessible areas.

Housing Strategy

Relevant to: age, disability and socio-economic

Policies SP11-SP25 seek to address the housing need of all types of people by providing for the objectively assessed need based on household formation statistics and other factors such as affordable housing. The group focused on the strategic need to provide affordable housing units for younger people who may be unfairly disadvantaged and unable to find housing accommodation when demand exceeds supply. The group had regard for concerns expressed at the public consultation drop ins held during January and February 2015 where members of the public were concerned that their children wouldn't be able to find housing and would be forced to move out of the town, village or district they grew up in.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination: by allocating sites for housing development the council is helping to ensure that residents, including those in younger age groups have access to housing and are not unfairly disadvantaged due to inability to afford or lack of supply. Evidence suggests that there is an element of need arising from "concealed households". These are dwellings that contain more than one "household" i.e. people that would normally form a household of their own separate to the primary household if they had the opportunity, for example grown up children or couples living with their parents. The Council's housing target seeks to address this issue.

Advance Equality of Opportunity: By ensuring that there is an adequate dwelling mix and housing supply the Council is ensuring that the housing market is accessible for all of the protected groups. By requiring 30% affordable housing the Council is seeking to mitigate financial disadvantage for people with socio-economic difficulties.

Foster Good Relations (promoting understanding): by identifying issues around accessibility and writing policy statements that seek to mitigate negative impacts the council seeks to raise awareness and understanding of the barriers that some people face when seeking suitable housing.

Environmental Strategy

Relevant to: age, disability and socio-economic

Policies SP21-SP35 seek to provide a strategy for protecting the local environment, particularly sites of national and international importance for wildlife; valued landscapes; "green infrastructure", open space and to seek enhancements to those areas and the provision of new open space and identifying and protecting local green spaces that are important to the local community and protecting allotments. Provision of open space and allotments have the potential to improve health of residents. They also provide a venue for social activity giving residents the chance to mix.

Policies of the plan seeks to ensure the quality of new development; and protect Thanet's heritage assets and responding to climate change policy SP35.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination and Advance Equality of Opportunity: by providing accessible and high quality recreation and heritage areas for all groups to enjoy.

Foster Good Relations (promoting understanding): by providing accessible recreation areas for all groups to enjoy and meet/gather.

Community Strategy

Relevant to: age, disability and socio-economic

Policies SP36-SP40 seek to provide a policy framework for healthy and inclusive communities ensuring new community infrastructure is provided alongside new development, particularly schools and commits the Council to working with other stakeholders to promote, protect and improve the health of Thanet's residents

and reduce health inequalities including a requirement for a new medical centre to be provided at Westwood. Land is also safeguarded for the future expansion of the QEQM hospital .

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination and Advance Equality of Opportunity: by reducing health inequalities through providing access to community networks for all groups.

Foster Good Relations (promoting understanding): by providing places for all groups to meet.

Transport Strategy

Relevant to: age, disability and socio-economic

Policies SP41-SP47 seek to establish a set of policies that encourage safe and sustainable travel; ensure that services are conveniently accessible; make sure that necessary new transport infrastructure is provided and improve general connectivity within the district, and to other parts of East Kent and to London.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination and Advance Equality of Opportunity: by seeking to ensure that every day travel by various modes of transport is accessible for the protected groups, and creates opportunity to access services and job opportunities.

Foster Good Relations (promoting understanding): by working to ensure that transport providers have an understanding of the travel needs of protected groups so that they can access suitable means of transport.

Screening of the Local Plan Development Management Policies

Economy - Economy (Policies E01-E03), Town & District Centres (Policies E04-E06), Tourism (Policies E07-E14) and the Rural Economy (Policies E15-E19)

Relevant to: age, disability and socio-economic

Policies E01 to E03 seek to protect existing employment sites and ensure that home and remote working. Home and remote working provide employment opportunities for everyone but is particularly beneficial in terms of accessibility.

Policies E04 to E06 are technical policies which guide how planning applications for town centre uses should be assessed. The ethos behind this is to maintain the vitality and viability of town centres in order that they can survive and fulfil the needs of all residents. Preserving the function of District and Local Centres in particular could help those who need shopping facilities within walking distance which would benefit specifically non drivers.

Policies E07 to E14 are policies designed to improve the tourism offer of Thanet and are often site specific. The benefit of improved tourism facilities in Thanet is better leisure facilities for Local People and improved employment opportunities. It is not considered that these policies have a negative effect on any of the protected characteristics.

Policies E15 to E19 seek to improve and maintain the viability of the rural economy at a proportionate scale. This benefits all groups as it provides access to employment within rural areas. There are no conflicts with groups with protected characteristics.

The policies within this section seek to further the aims of the Public Sector Equality Duty:

Preventing discrimination and advance equality of opportunity: by seeking to provide employment for

all. Existing successful employment sites are protected from alternative development ensuring that these facilities are not lost to higher value uses. The home working and digital infrastructure policies also allow for remote working which may particularly benefit people with physical disabilities who may not otherwise be able to access employment.

Ensuring vibrant successful town centres benefits all of the community as vital services can be accessed within the district and locally reducing the need to travel. This is beneficial for everybody but particularly those without the means or ability to travel.

Foster Good Relations (promoting understanding): the positive policies in this section encourage new employment opportunities in the district in accessible locations ensuring that all groups can access employment, services and leisure facilities, therefore not disadvantaging the protected groups.

Housing & Design - Housing (Policies HO1-HO26), and Quality Development (Policies QD01-QD04)

Relevant to: age, inclusive design, disability and socio-economic

Policies H01- HO26 allocate sites, and set out criteria, for provision of future housing, address specific housing needs and aim to optimise use of the existing dwelling and building stock.

Policies QD01 and QD02 set out criteria to ensure that new development is of a sustainable and high standard. QD01 sets criteria for achieving sustainable design and increasing energy efficiency thereby helping to reduce fuel poverty and reduce greenhouse gases. QD02 sets criteria for high quality and inclusive design of both the building and its related open spaces ensuring safe and accessible access for all; and the external appearance of a building and its relationship to its surroundings. including neighbouring buildings.

The plan seeks to improve the living conditions of residents by applying the national space and water efficiency standards in policies QD03 and QD04 ensuring appropriate liveable space and safe and accessible developments. The plan aims to improve the level of accessible and adaptable accommodation through policy QD05 by applying Part M(2) and (3) of the building regulations to help meet the needs of local residents with accessibility requirements.

QD06 and QD07 relate to advertisements and telecommunication masts to ensure that they are installed safely and with minimum visual impact.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination: By requiring/facilitating provision of specific types of homes including some which the market might not otherwise choose to deliver. For example the requirement to include a proportion of homes built to wheelchair standards may serve to secure access to a suitable home for certain individuals/households with protected characteristics such as age and disability. As the market might not otherwise choose to deliver such housing these policies may assist individuals and groups in lower income groups,

Advance Equality of Opportunity: The level, type, cost and tenure of housing to be delivered through the plan is based on aiming to meet the overall requirement of all households irrespective of whether or not they are subject to protected characteristics. In assessing overall need specific consideration has been given to the housing requirements of particular groups within the community which include individuals/groups with protected characteristics; for example older people, younger people, people suffering long term illness/disability, black and ethnic groups and gypsies and travellers.

Foster Good Relations (promoting understanding): by ensuring that partners understand the specific needs of all groups (including protected groups) for the ability to access good quality and accessible housing.

Environment and Green infrastructure (Policies GI01-GI07), Climate Change (Policies CC01-CC08) and Heritage (Policies HE01-HE05)

Relevant to: age, disability and socio-economic

Policies GI01 – GI07 protect important wildlife and habitats, existing open spaces, playing fields, and seek to provide new areas of open space, recreation areas and create new habitats through new development.

Policies CC01 – CC07 set out how development can adapt to, and mitigate against the effects of climate change including proposals for renewable energy.

Policies HE01 – HE05 set out the approach to development that will affect archaeology, important buildings and other local heritage assets and conservation areas.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination: by ensuring the provision of and accessibility to sports and recreation facilities and play areas for all of Thanet's residents.

Advance Equality of Opportunity: by ensuring that areas of open space, countryside and recreation are provided which are accessible to all as this will help improve people's quality of life and sense of well-being.

Foster Good Relations (promoting understanding): by ensuring that all groups can access open space and enjoy heritage.

Community - Safe & Healthy Environment (Policies SE01-SE08) and Communities (Policies CM01-CM04)

Relevant to: age, disability and socio-economic

Policies SE01 – SE08 address a number of environmental issues to help reduce the impacts of environmental pollution on human health. Policies CM01 and CM02 seek to ensure the provision of new, and retention of existing community facilities respectively. Policies CM03 and CM04 relate to the expansion of Margate and Minster cemeteries.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination and Advance Equality of Opportunity: by helping to create a cleaner healthier environment for all of Thanet's residents. Providing and retaining community facilities will provide services to those who do not have access to transport, and provide opportunities for people to meet and be part of a cohesive community.

Foster Good Relations (promoting understanding): by ensuring that all groups have access to community facilities and live in safe and healthy neighbourhoods.

Transport (Policies TP01-TP10)

Relevant to: age, disability and socio-economic

These policies address transport infrastructure for new development, aim to improve accessibility particularly by sustainable means of transport, aim to ensure adequate and suitably located car and coach parking, and support safe, efficient and environmentally suitable use of the highway network.

The policies within this section seek to further all three aims of the Public Sector Equality Duty:

Preventing discrimination:

Various forms of transport/travel are used and required to enable people to go about their daily business.

Some modes of travel may be needed/favoured by individuals/groups having protected characteristics or lower incomes. The policies are responsive to issues including people with limited mobility, energy and awareness, people unable to access/afford travel by private car, people wishing to improve their health through walking and cycling.

Advance Equality of Opportunity: Protected groups including age, disability, pregnancy may have limited mobility and greater reliance on non-car transport such as walking, cycling and public transport and may be more vulnerable to pollution for example exhaust emissions from private cars. Lower income groups may also be more reliant on these more sustainable means of travel. Policies signify that new development will be expected/encouraged to i) facilitate safe and convenient movement by pedestrians including people with limited mobility, elderly people and young children, ii) consider need to facilitate use of, and incorporate facilities supporting, public transport and incorporate appropriate facilities iii) address needs and provision of facilities for of cyclists.

Some protected groups (such as age and disability) may also be reliant on the use of private cars. The policies also aim to ensure that a suitable level of car parking is provided where feasible in new developments and maintained at the main commercial centres .

Foster Good Relations (promoting understanding): by working to ensure that transport providers have an understanding of the travel needs of protected groups so that they can access suitable means of transport.

Getting input from stakeholders and interested parties

The details of engagement and consultation are set out in the Consultation Statements and Annual Monitoring Reports prepared by the Council alongside the draft Local Plan.

However, in summary, the Council has sought to engage with a range of stakeholders at different stages of Local Plan preparation, including Council departments outside Planning (Housing, Environmental Services, Legal, etc.); Portfolio holders, Ward Members and TDC Committees; Community Groups; residents/visitors/businesses in the district and other public service bodies (including national statutory bodies, neighbouring Councils and others). This engagement and consultation has been undertaken through formal consultations, workshops and small group meetings.

Engagement with the following groups was carried out to assist with our evidence base and in formulating the Local Plan.

Economy sections:

Commercial property agents, Kent County Council Regeneration and Projects, Chamber of commerce, south east local enterprise partnership, and neighbouring councils. In deciding on allocating sites we liaised with Highways, economic development, the property team, and environmental health, TDC tourism,

Housing sections:

Strategic Housing team, landowners, the Highways Agency, Health and Safety Executive, Housing Associations, House Builders federation, Commercial property Agents, KCC particularly Estates, Highways and Education, Homes and Communities Agency, parish and Town Councils, Neighbourhood Forums. Stagecoach and the Gypsy and Traveller community.

Environment and Quality of Life Sections:

Natural England, the Environment Agency, Heritage England, Kent Wildlife Trust, Thanet Coast Project, Community Safety and Leisure, Environmental Health, Kent County Council (SuDs team and surface water management), KCC education, Clinical Commissioning Group, TDC cemeteries, TDC Technical Services regarding coastal management, Conservation team at TDC, KCC Biodiversity team,

These groups were also consulted during the preferred options consultation. Details of how the comments have been taken into account in the proposals can be found in the consultation statement.

Preferred Options Stage Public Consultation January 2015

For the preferred options stage of the Draft Local Plan consultation took place in the form of drop-in sessions spread throughout the day, evening and weekends at a number of locations across the District. The Council have also attended to brief parish councils at their own meetings with many having an open invitation to the public. The Council have also attended the meetings of various interest and pressure groups. In addition to this the Council invited sixth form pupils across the District to a conference to discuss issues the main issues that the Local Plan covers and air their views about what they want to see happen in the District over the plan period. The pupils were also encouraged to respond to the consultation and it was agreed that classroom time would be devoted to this.

It is considered that the consultation was designed in a way that was fully inclusive to all the protected groups. The drop in session venue were risk assessed and disabled access was taken into account including the use of toilets. It was also ensured that most [Hartsdown] of the venues were on a bus route so that those without a car could easily reach us.

The group felt that it was important to engage with young people of Thanet as it was felt that the Local Plan particularly affected their future in terms of finding homes and employment and therefore that the Council's work is relevant to them. The Customer Contact & Engagement Team wrote to all the sixth forms in the Districts with an offer of a conference either at the schools or in the Council Chamber at the offices. Two sixth forms responded (St Lawrence College and King Ethelbert's) and a conference was held in the Council Chamber. There was a good attendance of around 60 people, including teaching staff.

As well as these community sessions an 8 week consultation was carried out between 9th January and 6th March 2015. The Council received over 40,000 individual comments from approximately 1,800 people. Details of how these comments have been taken into account can be found in the Council's consultation statement.

Preferred Options Revisions Consultation, January 2017

Additional amendments to the draft Plan were made in January 2017, on a limited number of topics. Once again, there was a programme of local consultation and engagement, details of which can be found in the Local Plan [Consultation Statement](#). Just under 1,500 comments were received.

3.0 Options

To progress the plan to the next stage without amendment from the 'preferred options' document

To progress the plan to the next stage with amendments arising from consultation with the public, Members and stakeholders.

The Council's intention is to consider carefully the comments received at each stage, and where possible, to incorporate appropriate changes. However, it should be noted that Local Plans must be based on evidence and be in line with the relevant Government policy and guidance.

4.0 Next Steps

The draft Local Plan was published under Regulation 19 in August 2018. The EqlA has been reviewed, following Publication stage. Continuing concerns about future service provision, which is important for all groups, needs to be addressed, not just through the Local Plan/Infrastructure Delivery Plan process, but also by key delivery partners through their own business/service planning.

5.0 Review and Follow-up actions

Action	Responsible Officer	Completion date
Reg 18 - Consultation	Strategic Planning Manager	October 2017
Reg 19 - Publication	Strategic Planning Manager	August 2018
Reg 22 - Submission for Examination	Strategic Planning Manager	October 2018
Reg 23, 24 - Local Plan Examination	Strategic Planning Manager	tbc
Reg 26 - Adoption of Local Plan	Strategic Planning Manager	tbc