

Local Development Framework

Development Management Policies DPD

Equality Impact Assessment

March 2011



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DEVELOPMENT MANAGEMENT POLICIES - DEVELOPMENT PLAN DOCUMENT
Equality Impact Assessment

1. Introduction

Under equalities legislation (including the Disability Equality Scheme, Race Equality Scheme and Gender Equality Scheme), the Broads Authority has a duty to assess the expected impact of its functions, strategies, policies and services on particular groups of people. This is done by carrying out an Equality Impact Assessment.

An Equality Impact Assessment anticipates and recommends ways to avoid any discriminatory or negative consequences for a particular group on the grounds of race, gender, disability, faith, sexuality or age. This may be extended where relevant to include other potentially adverse or discriminatory factors such as socio-economic status or health. The assessment also helps to demonstrate the potential benefits for equality target groups, and ways these benefits might be improved.

2. What is being assessed?

An Equality Impact Assessment of the Development Management Policies DPD (DMPDPD) has been undertaken to consider whether the Plan policies reflect the equality needs of the Broads community and others potentially affected by the Plan.

Activity or project	Development Management Policies DPD
Aims	The DMPDPD builds upon the Authority's adopted Core Strategy (September 2007). It includes more detailed development management policies that set out criteria against which development in the Broads will be assessed, providing clear guidelines on the circumstances in which planning permission will be granted or refused. The policies have been formulated to ensure that development contributes to the delivery of the Core Strategy, which in turn sets out the long term spatial vision for the Broads with a range of organisations and groups.
Who is affected	All those with an interest or stake in the future enjoyment, development or management of the Broads, including local residents and businesses, landowners, Government organisations, trusts and charities, visitors and volunteers Demographic data relating to the Broads Executive Area is set out in the Sustainability Appraisal report that accompanies the DMPDPD. The report is available on the Authority's website at: www.broads-authority.gov.uk .
Responsible body	Broads Authority

The DMPDPD is required to be consistent with the LDF Core Strategy and is generic in nature rather than site specific. This assessment primarily considers the overarching impacts of the DMPDPD objectives, policies and potential implications where these are known.

3. Gathering evidence

Information to support the Equality Impact Assessment of the DMPDPD comes from a number of sources. The assessment will help to identify gaps in information and the need for further consultation or research.

Data sources include:

- Service monitoring: Profile data relating to age, disability, gender, and ethnicity is collected as part of the Authority's performance monitoring programme;
- Information from consultation exercises, including consultation on draft versions of the Plan and other consultations;
- Service user feedback;
- Staff feedback;
- Liaison with partners, community groups and forums;
- Census data and demographics;
- National Park data and audits.

Equality policies and good practice already in place include the following.

Corporate Equalities Plan: Sets out how the Equality Standard for Local Government will be achieved in respect to access to services and employment.

Statement of Community Involvement (SCI): sets out how the Authority intends to involve local communities and other stakeholders in the production of its Local Development Framework. The principles and practices of community involvement apply across the whole of the Authority's work. The SCI identifies existing and potential ways of involving under-represented groups in the Broads, including young people, people with disabilities, black and ethnic minority groups, and gypsies and travellers. The SCI will be reviewed in 2011.

BA Communication Strategy: Para 8.3 states "Accessibility and Social Inclusion: Published information will be accessible to all, and available in formats which are suitable for people with disabilities. All key publications will also be produced in large print and on audiotape. The Authority will actively promote social and ethnic inclusion in its communications."

Broads Authority website: The Broads Authority is committed to providing a web site that is accessible to the widest possible audience, regardless of ability or technology and including those who have visual, hearing, motor and cognitive impairments. The Authority is actively working to increase the accessibility and usability of its web site and meet its legal obligations under the UK Disability Discrimination Act (DDA). The website aims to achieve overall compliance with the Web Accessibility Initiative's (WAI) guidelines, which explain how to make web content accessible to people with disabilities.

Visitor information: A range of information on accessibility to the Broads is provided by a variety of information providers, including the Authority (<http://www.broads-authority.gov.uk/visiting/access-for-all.html>), Visit Norwich (<http://www.visitnorwich.co.uk/broads-accessibility.aspx>) and Enjoy the Broads (http://www.enjoythebroads.com/curated_content/accessible).

Sustainable Development Fund: DEFRA fund administered by the Authority providing funding to community projects in the Broads, including projects that promote social inclusion and engagement with young people.

Member for Equalities: The Authority has a Lead Member for Equalities, whose role is to champion within the membership equalities in achieving service outcomes and actions.

4. General equality issues

Disability

The Broads is a flat, low-lying landscape but its wetland nature means that some areas can be difficult to access. While not all areas can be accessible to all user abilities, a 'least restrictive' approach that removes or minimises barriers to access where possible, with a range of graded routes for varying user abilities, ensures that people with disabilities can access and enjoy the Broads.

Negative impacts or barriers:

It is not possible in practice to provide the same level of access to all users, but the needs of people with disabilities need to be considered by the Authority and its partners in the provision of access, services and facilities and in the development of planning policies.

Positive impacts:

- Rights of Way Improvement Plan/Broads Public Rights of Way and Open Access Improvement Plan: includes assessment of needs for all user groups;
- Broads Local Access Forum: Semi-independent body, established under the Countryside and Rights of Way Act, to advise on the improvement of public access to land within the Broads. It promotes closer liaison and understanding between the various groups and organisations with interest in access to the Broads and the adjacent parts of Norfolk and Suffolk;
- Information provision: The 'Easier Access in the Broads' leaflet provides information on land and water access opportunities for boating and boat trips, cycling, fishing, walking, visitor attractions, public facilities and public transport. The Barton Access Pack contains large print and Braille brochures, CD and audio cassette for people with disabilities visiting the accessible boardwalk at Barton Broad. In addition to the provision of information in large print and audiotape, Braille guides and interpretation boards are also available at a number of locations in the Broads.

Age

There are approximately 6,370 residents within the Broads Executive Area¹. Of these, approximately 20% are under 25 and 45% are aged 55 and over.

Negative impacts or barriers:

There is no evidence to suggest that the DMPDPD discriminates on the grounds of age. The social and health benefits of encouraging young people, particularly school aged children, to experience and enjoy the area, is emphasised at a national level through schemes such as Forest Schools and Baseline on the Broads.

¹ mid-2007 Census; ONS

Positive impacts:

- Forest Schools – working with disadvantaged young people to build skills and confidence;
- Education work through Broads Environmental Education Network, BA Ranger team schools work, Junior Rangers initiative, How Hill Trust Environmental Education Centre;
- BA annual events programme ‘Fun in the Broads’;
- ‘Every Norfolk Child Matters’ initiative;
- Broads Futures – Education for Sustainable Development.

Race

Approximately 97% of residents in the Broads Executive Area are White British in origin². Although about 10% of the national population are of an ethnic minority background, only about 1% of visitors to the National Parks and the Broads are from ethnic minorities.

Negative impacts or barriers:

There is no evidence to suggest that the DMPDPD discriminates on the grounds of race; however it is recognised that more could be done to encourage people from black and ethnic minorities to experience and enjoy the Broads more generally.

Positive impacts:

- MOSAIC is a partnership project led by the Campaign for National Parks to build links between black and minority ethnic (BME) groups and National Parks. MOSAIC is working with the Broads Authority to develop BME champions to promote understanding and enjoyment of the Broads;
- Constituent county racial equality councils, MENTER (East of England BME Network) and the Gypsy Council are represented on the Authority’s consultation database and informed about the development of the DMPDPD. The Authority also seeks advice as necessary from constituent council BME and traveller liaison officers and groups.

Other equality groups

There is no evidence to suggest that the DMPDPD discriminates on the grounds of gender, religion or belief, or sexual orientation. The Plan objectives make a positive contribution to local rural economic sustainability.

Groups and organisations with knowledge and working experience relevant to equality target groups are represented on the Authority’s consultation database and informed about the development of the DMPDPD. This includes community and social groups including primary care trusts, county police authorities, county strategic partnerships, town and parish councils, volunteer associations, Health and Safety Executive, education bodies, charities and trusts.

² 2001 Census; ONS

Equality impact assessment: Initial screening of Development Management Policies DPD

**'Neutral' means that the objective is not likely to impact on an equality target group in a different way to any other non-target groups*

Policy Number	Policy Content & Summary	Potential impact on particular target group(s)			Comments/ action
		Adverse/discriminatory	*Neutral	Positive	
	Draft plan and consultation documents	<input checked="" type="checkbox"/> Documents printed in 11pt font <input checked="" type="checkbox"/> Documents in English language only			<i>DMPDPD available on website (adjustable font size) and in large print /audio tape on request. No requests received for documents in other languages; such requests may have to consider resource implications.</i>
	DMP DPD Consultation Process	<input checked="" type="checkbox"/> Consultation in English language only			<i>No requests received for documents in other languages; such requests may have to consider resource implications. Ensure communication and consultation processes are in line with Communications Strategy and Statement of Community Involvement. Consultation database includes equality groups. Consultation process include liaison with equality representatives.</i>
DP1	Natural Environment Development will only be permitted where it can be demonstrated it would not harm nature conservation interests		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP2	Trees and Landscape Development will only be permitted if it would not have an		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>

Policy Number	Policy Content & Summary	Potential impact on particular target group(s)			Comments/ action
		Adverse/discriminatory	*Neutral	Positive	
	adverse impact on trees or landscape				
DP3	Water Quality and Resource Sufficient water infrastructure capacity will be required before development is occupied.		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP4	Design Design principles			<input checked="" type="checkbox"/>	<i>Implementation of policy is largely generic. However, there is emphasis in the policy wording as to the need to ensure ease of movement and access and that the risk of crime or antisocial behaviour should be reduced.</i>
DP5	Historic Environment Development permitted only where it would not adversely affect an historic asset		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP6	Re-use of historic buildings Conversion or change of use of listed buildings		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP7	Energy Generation and Efficiency 10% renewable energy target and BREEAM standards		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP8	Renewable Energy Renewable energy projects permitted subject to criteria		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP9	Telecommunications Development		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any</i>

Policy Number	Policy Content & Summary	Potential impact on particular target group(s)			Comments/ action
		Adverse/discriminatory	*Neutral	Positive	
	Essential infrastructure supported where it is of an acceptable scale and design				<i>specific implications for specific groups.</i>
DP10	Advertisements and Signs These will be permitted subject to design details		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP11	Access on land Access standards for development proposals on land			<input checked="" type="checkbox"/>	<i>Implementation of policy is generic. However the policy wording contains seeks to improve accessibility in all forms and allow for parking in accordance with adopted standards (including disabled parking).</i>
DP12	Access to the Water Access standards for development proposals that encourage the use of waterways		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP13	Bank Protection Standards for bank protection proposals		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP14	General location of Sustainable Tourism and Recreation Development		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP15	Holiday Accommodation – New provision and retention Permits new holiday accommodation subject to criteria		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>

Policy Number	Policy Content & Summary	Potential impact on particular target group(s)			Comments/ action
		Adverse/discriminatory	*Neutral	Positive	
DP16	Moorings Permits new moorings in certain circumstances			<input checked="" type="checkbox"/>	<i>Implementation of policy is generic. However the policy wording encourages increasing accessibility to local facilities. Previous references to “walking distances” were removed.</i>
DP17	Leisure Plots Restricts the use of mooring plots to mooring of boats. New leisure plots will not be permitted		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP18	Protecting General Employment Land Retains sites in general employment use for that purpose		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP19	Employment Diversification Allows for farm diversification in certain circumstances		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP20	Development on Waterside Sites in Commercial use, including boatyards Allows for redevelopment or change of use subject to criteria		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP21	Conversion of buildings in the Countryside Allows for re-use of redundant buildings to employment or tourism uses		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP22	Residential Development Within Defined Development Boundaries		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any</i>

Policy Number	Policy Content & Summary	Potential impact on particular target group(s)			Comments/ action
		Adverse/discriminatory	*Neutral	Positive	
	Allows for small scale residential development				<i>specific implications for specific groups.</i>
DP23	Affordable Housing Allows for local needs housing outside of development boundaries		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP24	Replacement Dwellings Allows for replacement of existing dwellings within the flood plain		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP25	New Residential Moorings Allows for new residential moorings subject to criteria			<input checked="" type="checkbox"/>	<i>Implementation of policy is generic. However the policy wording encourages increasing accessibility to local facilities. Previous references to “walking distances” were removed.</i>
DP26	Permanent and Temporary Dwellings for Agricultural, Forestry and Other Workers Allows for residential dwellings for particular circumstances		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP27	Visitor and Community facilities Allows for new or redevelopment of existing facilities subject to criteria		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>

Policy Number	Policy Content & Summary	Potential impact on particular target group(s)			Comments/ action
		Adverse/discriminatory	*Neutral	Positive	
DP28	<p>Amenity</p> <p>Allows for development provided no adverse effects on the amenity of adjoining occupiers</p>		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP29	<p>Development on Sites With a High Probability of Flooding</p> <p>Sets out the criteria for determining the appropriateness of new development in certain flood zones</p>		<input checked="" type="checkbox"/>		<i>Implementation of policy is generic and does not raise any specific implications for specific groups.</i>
DP30	<p>Developer Contributions</p> <p>Sets out the required contributions from developers towards certain community and social infrastructure</p>			<input checked="" type="checkbox"/>	<i>Implementation of policy is generic. Encourages the provision of community infrastructure.</i>

5. Conclusions

The DMPDPD is a relatively high level document aimed at providing generic guidance on how applications for planning permission will be considered in the future. As such it is not easy to carry out a full impact assessment and assess the impact in detail on all equality strands. Subsequent LDF documents e.g Site Specifics will be subject to equality impact assessment as will any management plans or development briefs. This initial impact assessment has been used to inform the development of the DMPDPD and potential adverse impacts taken into account.

The evidence does not suggest that this DMPDPD could potentially adversely affect people due to age, gender, disability, race, religion or sexual orientation.