

Equality Analysis for Core Strategy and Development Plan (2018)



Section A - EQUALITY ANALYSIS TEMPLATE

You must complete this in conjunction with reading Equality Analysis Guidance

Name of Policy/Decision/Project/Activity:

Sunderland Local Plan : Core Strategy and Development Management Plan

Date: 30/05/2018

Version Number:

Equality Analysis completed by:

Name: Clive Greenwood

Job title: Senior Planning Policy Officer

Responsible Officer or Group:

Name: Louise Sloan

Is the Activity:

New/Proposed ()

Changing/Being Reviewed ()

Other ()

Part 1. Purpose and Scope

Purpose

In this section outline briefly:

- what the policy, decision or activity is and what the intended outcomes/benefits are (linked to the Corporate Outcomes Framework)
- over what period of time the outcomes will be achieved
- why it needs to be implemented or revised
- what populations are affected by the proposal
- who is expected to benefit and how, i.e. young people, older people, carers, BME groups, ward areas/communities, etc
- whether there are any overlaps with regional, sub-regional, national priorities.

[Further Guidance](#)

Purpose

This equality analysis considers the current version of the Core Strategy and Development Management Plan (CSDP) which has been under development since 2005. The CSDP is presently at publication stage and is scheduled for adoption in 2019. The Government requires all councils to produce a set of documents collectively known as the Local Plan which sets out the planning strategy and policies for an area. The CSDP is the main Local Plan document, and will replace a number of remaining saved policies of the Adopted Sunderland Unitary Development Plan. Overall, the Local Plan will comprise of three key documents: the CSDP, which will set out the overarching spatial strategy for development within the city over the plan period from 2015-2033, as well as containing more specific detailed Development Management policies; and a separate Allocations and Designations Plan which will make the site specific allocations necessary to deliver the Core Strategy. The adopted International Advanced Manufacturing Park Area Action Plan also forms part of the Local Plan.

It is a priority of the Local Plan to promote community cohesion, support regeneration, and tackle deprivation and inequalities to create cohesive and sustainable communities. It is intended that the policies set out in the CSDP will provide strategic policy direction which will in turn lead to positive outcomes for neighbourhoods and communities in Sunderland. However, by being strategic rather than site specific, it is difficult for the Core Strategy process to clearly demonstrate how key groups and stakeholders can directly influence policy direction. The forthcoming Allocations and Designations Plan will take the lead from these strategic policies and be site and people specific, enabling specific groups to directly influence policy and development.

The CSDP has been influenced by, and in turn informed the production of the Sunderland Strategy and Sunderland Economic Masterplan and will be the key mechanism in delivering their spatial objectives, as well as assisting many other council-wide plans and strategies.

Scope

The whole of Sunderland, including residents, businesses and visitors will benefit from this strategy. All of these stakeholders have been consulted on the CSDP thereby providing the opportunity for holistic involvement. The Council also has a 'duty to cooperate' with the neighbouring authorities of Durham, Gateshead and South Tyneside, and thereby cross-boundary cooperation and agreement on wider strategic matters is ongoing.

All consultation is carried out in accordance with the adopted Statement of Community Involvement (SCI) which is available online at <https://www.sunderland.gov.uk/media/17902/Statement-of-Community-Involvement-SCI-/pdf/SCI.pdf>

Intelligence and Analysis

Please describe:

- What sources of information have been used to inform this assessment/analysis (this should include but is not limited to consultations, resident/service user feedback and statistical data and intelligence)
- **What the information is telling you** – this should be broken down by each of the protected characteristics or other identified groups which could be disadvantaged. Each of the aims of the equality act should be considered in relation to each of the protected characteristics.

[Further Guidance](#)

This CSDP is the product of robust evidence, public consultation and a Sustainability Appraisal undertaken by the City Council and its partners. In addition, it has been informed by:-

- The Corporate Plan
- The Sunderland Economic Masterplan (2010) 3,6,9 Vision for Sunderland
- The National Planning Policy Framework and previous statements of national planning policies
- The results of a comprehensive evidence base such as the Strategic Housing Market Assessment and Strategic Housing Land Availability Studies, Employment Land Review, Retail Needs Assessment, Transport Assessment, Education Report, Greenspace Audit and Report, Health Impact Assessment, Demographic Analysis and Forecasts, Green Belt Review, Settlement Break Review, Strategic Land Review, Gypsy and Traveller Needs and Landscape Character Assessment.
- The findings of the accompanying Sustainability Appraisal and Habitats Regulations Assessment
- The outcome of extensive engagement activities with the public, local businesses and partners. Consultations began in late 2005 with the Issues and Options Draft, the Preferred Options Draft in 2007/08, the Alternative Approaches in 2009, the Core Strategy Revised Preferred Options in 2013, the Core Strategy Growth options Consultation 2016 and the Draft Core Strategy and Development Plan 2017. Consultation has involved voluntary and community groups, Independent Advisory Groups (IAGs), statutory and non-statutory consultees, local residents and neighbouring authorities (see Appendix 1).

This version of the Core Strategy is accompanied by three key supporting documents:

- **Sustainability Appraisal** report as required by the Planning and Compulsory Purchase Act 2004. This includes a Strategic Environmental Assessment of the plan as required by European directive.
- A **Habitats Regulations Assessment (HRA)** Report of the potential impact of the plan on Natura 2000 sites (these are international designations covering species and ecological habitats), again a legislative requirement, has also been prepared.
- The **Infrastructure Delivery Plan** which demonstrates what infrastructure is required to support planned growth and development, how much will it cost, where the money will come from to provide infrastructure and who will be responsible for its delivery.

Strategic Housing Market Assessment (SHMA) - Every local planning authority is required to demonstrate how it will meet an appropriate share of the housing need in its housing market area and to plan positively for the delivery of sufficient new homes to support future prosperity in its area. It supports the creation of sustainable housing sites and housing needs for all ages and specific needs such as for disabled people. It includes a specific section relating to household groups that have particular housing requirements, including: older persons accommodation-policy and strategic requirements including supporting independent living requirements and providing a range of housing options designed at older people such as extra care, sheltered accommodation and co-housing for rent or sale; providing property that is suitable for disabled needs; housing requirements for BAME households (including overcrowding and sharing accommodation), gypsy and travellers and showpeople needs for housing sites (although this is looked at in more detail via the Gypsy & Traveller and Travelling Showpeople Accommodation Assessment). CSDP Policy SP1, SP8, H1, H2, H4, H6.

SHLAA - A SHLAA is a technical exercise to assess the amount of land that could be made available for housing development. It is part of the evidence base that will inform the plan making process. As with SHMA it is influenced by the Plan requirement to promote sustainable development, therefore housing sites are promoted on urban sites as far as possible, alongside bus routes and/or beside local facilities. This supports all people having access to housing. CSDP Policy SP8.

Sunderland Housing Strategy 2017-22 – The purpose of the strategy is to set clear direction, over the next 5 years, to offer more choice in housing by developing new homes and improving existing homes and neighbourhoods. All residents can benefit by the strategy as it is aimed at improving housing, neighbourhoods and housing choice across the city. Older people's housing needs are addressed in the strategy as are those of homeless people and disabled people. Affordable housing is also proposed for those on lower incomes.

ELR - The Employment Land Review includes an assessment of the current supply of employment land, investigates future demand for employment land and premises, and identifies any deficiencies in current supply in meeting future needs. Sites are assessed against a scoring matrix – there is a strong focus on accessibility to the road network and to public transport network, as well as concentrations of population. Therefore the report is pitched at the macro scale, seeking to determine the most sustainable option for all of the city's residents, as opposed to focusing on specific and individual need. CSDP Policy SP1, EG1, EG2, EG3, EG4, EG5.

Retail Needs Assessment / Leisure Needs Assessment – review of the availability and variety of retail / leisure provision across the city. Seeks to focus retail / leisure provision on established centres and places with most public transport and walking accessibility. It recommends local thresholds for provision (via a sequential assessment) that help to reinforce protecting our centres. Maintaining our centres supports those people reliant on public transport and walking, indirectly supporting the need for quality transport services and good quality public realm, which

should support older persons, disabled persons, pregnant people. CSDP Policy SP2, VC1, VC2, VC3, VC6.

Transport Assessment – The purpose of the transportation assessment is to guide the emerging Local Plan and the supporting Infrastructure Delivery Plan (IDP). It assesses the suitability of the local highway network impacted by the Local Plan strategic sites and identifies potential network improvements to enable the delivery of Sunderland's Local Plan. Public transport and cycling improvements are recommended to improve accessibility in order to make strategic sites sustainable. Overall, the assessment is pitched at the macro scale, seeking to determine the most sustainable option for all of the city's residents, as opposed to focusing on specific and individual need. CSDP SP10, ST1, ST3.

Education Report – this report examines how much residential development is proposed across the city and identifies where school place gaps in provision will occur (primary and secondary school provision). The report identifies what would be required to rectify any shortfalls in provision. In general, this report focuses at a macro scale looking at need for all pupils to be able to access school provision, endeavouring to ensure that development does not take place that fails to address actual need, or requires excessively large distances for pupils to travel. CSDP Policy ID2.

Greenspace Audit and Report – this report assesses all of the city's different types of greenspace by quantity and quality and identifies spatial deficiencies in provision. The ultimate aim is to ensure that every household has access a range of quality greenspaces- this is a positive intervention because there is a strong correlation in Sunderland that greenspace quality is worse in deprived areas and better in less deprived areas. The audit considers disabled access as part of the individual site evaluations. CSDP Policy NE4.

Health Impact Assessment – this report has assessed the health impacts of the CSDP, to ensure that the CSDP is aligned to the Sunderland Health and Well Being Strategy and to make recommendations that positively address health issues for city residents. Specific recommendations include: the need to provide a policy on hot food takeaways in proximity to schools, in order to help take account of risks to the health of children and young people; promoting active travel and healthy lifestyles; measures to improve quality of life, and; exposure to different types of pollution. Recommendations are generally pitched at the macro scale, involving all of the city's residents. CSDP Policies VC4, SP7, HS1, HS2, HS4, BH1, NE1, NE4.

Infrastructure Delivery Plan - The plan identifies the physical, social, green infrastructure needed to support and underpin Sunderland's growth through to 2033. This assessment of infrastructure is pitched at the macro level, involving all of the city's residents, and is underpinned by sustainable principles. CSDP Policy ID1, ID2.

Green Belt Assessment Stage 1 Updated and Stage 2; Stage 3 Green Belt Site Selection Report – These reports form a city-wide assessment of the city's Green Belt land. Both reports acknowledge a city requirement to provide residential sites within the Green Belt in order to provide housing sites for the duration of the plan. The assessment of sites has been underpinned by sustainable principles, including an evaluation of a site's sustainable access to public transport services and local facilities, as well as environmental and physical site suitability. In equality terms, the impact relevance is at a macro scale, involving all of the city's residents. CSDP Policy NE6, SP3, SP4, SP5, SP6.

Settlement Break Review – this review examines all of the city's Settlement Breaks and considers whether all land parcels correlate to the 3 principles of Settlement Break. A small proportion of the land area has been proven to have limited Settlement Break purpose, and has

therefore been considered within the SHLAA for residential purposes. Once again, the assessment of these sites has been underpinned by sustainable principles, including sustainable access to public transport services and local facilities. CSDP Policy NE7.

Strategic Land Review – The 2016 SLR investigated all employment land, SHLAA, Settlement Break, Green Belt land and White Land, considering the suitability of land for development against a range of environmental and physical factors. As with GB and SB above the report is underpinned by sustainable principles- not specific to equality type/need. Contributed to CSDP Policy SP8, NE6, NE7, SP3, SP4, SP5, SP6.

Gypsy & Traveller and Travelling Showpeople Accommodation Assessment – assessment of housing need for gypsy and travelling showpeople across the city. Focuses on the specific BME grouping of gypsy and travelling showpeople. The report concludes that further site plots are required for travelling showpeople and gypsy travellers, and CSDP Policy H4 specifically addresses this.

Landscape Character Assessment / Wind & Solar Landscape Assessment – this report presents a description and assessment of the city's urban and rural landscape, making strategic recommendations for landscape enhancement or protection. This includes recommendations to improve area access, particularly when physical barriers such as roads or railways thwart access to the countryside in particular. Such accessibility would focus on the need to create multi-user routes which enable all-round access for walkers, cyclists, horse-riders and disabled access. One of the key intentions is to ensure that the rural and urban environment is enhanced to encourage all residents to be more physically active and appreciate the environment, and to support overall mental and physical health. CSDP Policy NE1, NE9, NE10, NE11.

Corporate Plan 2016-20– this is the Council's overarching strategic plan for the years 2016/2017 to 2019/2020. Promoting equality and reducing inequalities is fundamental to the Plan's approach and to meeting the Council's Public Sector Equality Duty. The Corporate Plan is subject to an Equalities Analysis, through the Service Plans supporting it. The policies in the CSDP support the ways of working in the Corporate Plan, using a detailed intelligence base that accounts for different needs in order to form the policies and inform decision-making.

Playing Pitch Strategy – this strategy provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities between 2014 and 2019. The assessment of the quality of sports pitches incorporates criteria that includes access for disabled people, and encourages sports provision for 'all ages'. Otherwise, the strategy focuses at the macro level and seeks improvements across the city to ensure good quantity and quality of provision available to all residents. CSDP Policy NE4.

Local Flood Risk Management Strategy (LFRMS) - This report acts as a tool to deliver the benefits of well managed environments by reducing flood risk to people and properties. It identifies different types of flood risk and identifies localities at risk within the city. Intervention / specific schemes are proposed / undertaken to tackle these risk areas. These schemes are undertaken for the benefit of all city residents and not specific to an equality grouping. CSDP Policy WWE2, WWE3, WWE4, WWE5.

Strategic Flood Risk Assessment (SFRA) / Preliminary Flood Risk Assessment (PFRA) – Both reports provide a spatial assessment of flood risk across Sunderland and includes sources of flooding. The risks associated with flooding have been mapped. The reports provide key recommendations. As with the LFRMS above, these schemes are undertaken for the benefit of all city residents and not specific to an equality grouping. CSDP Policy WWE2, WWE3, WWE4, WWE5.

Gaps in intelligence and information

Having analysed the information available to you:

- are there any gaps in intelligence or areas where understanding needs to be improved? Please describe what these are and what actions you intend to take to obtain/improve the information. These actions should be covered in the action plan.
- are there any groups who should be expected to benefit who do not? Please describe why not and whether you will amend the decision to change this outcome. This should also be covered in the action plan.

[Further Guidance](#)

There are no gaps in intelligence and information identified regarding the Plan – though gaps could potentially be identified through the forthcoming plan consultation process, whereupon this assessment will be reviewed. All actions currently identified are classed as positive or neutral, with no negative impacts identified.

Additional Impacts

The policy or action may also have an impact on other groups or individuals which are not covered by statutory requirements. Please outline any additional individuals or groups which have not already been covered. This could include socio-economic groups, voluntary and community sector, carers or specific communities which face additional challenges (such as former coal mining areas or areas of high deprivation)

[Further Guidance](#)

Positive impacts are identified in relation to deprived groups, by virtue of the core plan principle being to promote sustainable forms of development, which in turn support health equality, equality of access to a range of jobs, housing, services and green infrastructure. Policies specifically focus upon addressing deficiency gaps, which are often focused on deprived neighbourhoods.

Part 2. Analysis of Impact on People

In this section you must **review the intelligence described above and summarise the intended and potential impact of the policy, decision or activity** on the people of Sunderland. This includes specific consideration of the impact on individuals, groups with protected characteristics and communities of interest within the city. Please briefly outline any positive, neutral or negative impacts on the specific groups below. Please note that any negative impacts should have a corresponding action in the action plan in the page below.

In this assessment it is important to remember the **Council is required to give due regard to:**

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Each of these aims must be summarised in turn in relation to the groups outlined below.

[Further Guidance](#)

Characteristic	List of Impacts		
	Positive	Neutral	Negative
Age	<p>Supported by the SHMA, housing policy has the potential to have a positive impact on residents of different age ranges by:</p> <ul style="list-style-type: none"> • Rebalancing the housing stock by providing a range of housing, including accommodation to meeting the needs of an ageing population (Policy H1, H5) • Supporting development proposals that provide a mix of housing types/design and tenures to meet current and future housing need, taking into account the ageing population (Policy H1). • Increasing the choice of suitable accommodation for the elderly population and those with special needs including bungalows and extra care housing (Policy H1). <p>Greater accessibility to services,</p>	<p>The CSDP contains policies that are generally relevant to all ages.</p> <ul style="list-style-type: none"> • Reduce health inequalities in the areas with the poorest health (Policy SP7) • Support and facilitate sustainable economic growth (Policy SP1) • Support designated centres to ensure they remain as thriving and viable destinations (Policy VC1, VC5) • Urban design- creating sustainable, mixed-use developments which support the function and vitality of the area in which they are located (Policy BH1) 	<p>No overall negative impacts of the CSDP policies have been identified associated with age.</p>

	<p>facilities and green infrastructure will positively support older people:</p> <ul style="list-style-type: none"> • Develop neighbourhoods and centres that are safe and attractive, encourage social interaction, accessible to public transport and local facilities (Policy SP7) • Creating attractive, safe, legible, functional and accessible public spaces (Policy BH3) • Ensure that all residents have access to a wide range of quality greenspace (Policy NE4) • Promoting sustainable travel and seek to enhance connectivity for all users (Policy SP10) • Improve accessibility in the City Centre, increasing priority for pedestrians and cyclists, improving legibility and signage, improving public realm and incorporating inclusive design principles (Policy ST1). <p>Ensuring that new development is age friendly (Policy SP7)</p>		
Disability	<p>Supported by the SHMA, housing policy has the potential to have a positive impact on residents of different age ranges by:</p> <ul style="list-style-type: none"> • Supporting development proposals that provide a mix of housing types/design and tenures to meet current and future housing need, taking into account the ageing population (Policy H1). • Increasing the choice of suitable accommodation for the elderly 	<p>Broad references are made to disabled needs within the supporting Retail Needs Assessment and Greenspace Audit. The CSDP provides policies that support sustainable development, and accessible, healthy living environments. These policies are generally relevant to people with disabilities:</p> <ul style="list-style-type: none"> • Rebalancing the housing stock by providing a range of housing, including accommodation to meeting the needs of an ageing population (Policy H1, H5) • Support and facilitate sustainable economic 	<p>No overall negative impacts of the Core Strategy policies have been identified associated with disability.</p>

	<p>population and those with special needs including bungalows and extra care housing (Policy H1).</p> <p>Reducing health inequalities will have a longer term positive impact for people with disabilities, especially if people are living with long term conditions:</p> <ul style="list-style-type: none"> • Reduce health inequalities in the areas with the poorest health (Policy SP71). <p>Greater accessibility to services, facilities and green infrastructure will positively support people with disabilities, supporting independent living and reducing social isolation:</p> <ul style="list-style-type: none"> • Develop neighbourhoods and centres that are safe and attractive, encourage social interaction, accessible to public transport and local facilities (Policy SP7) • Creating attractive, safe, legible, functional and accessible public spaces (Policy BH3) • Ensure that all residents have access to a wide range of quality greenspace (Policy NE4) • Promoting sustainable travel and seek to enhance connectivity for all users (Policy SP10) • Improve accessibility in the City Centre, increasing priority for pedestrians and cyclists, improving legibility and signage, improving public realm and incorporating inclusive design principles (Policy ST1). 	<p>growth (Policy SP1)</p> <ul style="list-style-type: none"> • Support designated centres to ensure they remain as thriving and viable destinations (Policy VC1, VC5) • Urban design- creating sustainable, mixed-use developments which support the function and vitality of the area in which they are located (Policy BH1) 	
Gender/Sex	There is evidence to suggest that more	The CSDP provides policies that support	No overall negative impacts of the

	<p>women use public transport, therefore policies in the plan that support greater accessibility to public transport services have a positive impact in this respect:</p> <ul style="list-style-type: none"> • Develop neighbourhoods and centres that are safe and attractive, encourage social interaction, accessible to public transport and local facilities (Policy SP7) • Creating attractive, safe, legible, functional and accessible public spaces (Policy BH3) • Promoting sustainable travel and seek to enhance connectivity for all users (Policy SP10) 	sustainable development for all persons.	Core Strategy policies have been identified associated with gender/sex.
Marriage & Civil Partnership		The CSDP provides policies that support sustainable development for all persons.	No overall negative impacts of the Core Strategy policies have been identified associated with marriage/civil partnerships.
Pregnancy and maternity	<p>Policies that improve accessibility via public transport and public realm in centres will improve accessibility for people using pushchairs and prams:</p> <ul style="list-style-type: none"> • Develop neighbourhoods and centres that are safe and attractive, encourage social interaction, accessible to public transport and local facilities (Policy SP7) • Creating attractive, safe, legible, functional and accessible public spaces (Policy BH3) • Promoting sustainable travel and seek to enhance connectivity for all users (Policy SP10) 	The CSDP provides policies that support sustainable development for all persons.	No overall negative impacts of the Core Strategy policies have been identified associated with pregnancy and maternity issues.
Race/Ethnicity	Supported by the SHMA, housing policy has the potential to have a positive impact on showpeople and gypsies and travellers by:	The CSDP provides policies that support sustainable development for all persons.	No overall negative impacts of the Core Strategy policies have been identified associated with race / ethnicity.

	<ul style="list-style-type: none"> Identifying additional land to accommodate travelling showpeople and gypsies and travellers (Policy H4). <p>Community, social and cultural facilities are positively protected in the plan:</p> <ul style="list-style-type: none"> The Council will protect existing and support the development of new social and community facilities including places of worship (Policy VC5). <p>In addition, the CSDP has a specific policy relating to future burial spaces across the city, including meeting the burial requirements of the various ethnic and religious groups within the city (Policy NE5).</p>		
Religion/belief	<p>Community, social and cultural facilities are positively protected in the plan:</p> <ul style="list-style-type: none"> The Council will protect existing and support the development of new social and community facilities including places of worship (Policy VC5). <p>The CSDP has a specific policy relating to future burial spaces across the city, including meeting the burial requirements of the various ethnic and religious groups within the city (Policy NE5).</p>	The CSDP provides policies that support sustainable development for all persons.	No overall negative impacts of the Core Strategy policies have been identified associated with religion / belief.
Sexual Orientation		The CSDP provides policies that support sustainable development for all persons.	No overall negative impacts of the Core Strategy policies have been identified associated with sexual orientation.
Gender identity		The CSDP provides policies that support sustainable development for all persons.	No overall negative impacts of the Core Strategy policies have been identified associated with trans-gender/gender identity.

Please add any additional groups mentioned in the “additional impacts” section above.

Part 3. Response to Analysis, Action Plan and Monitoring

In this section please outline what actions you propose to take to minimise the negative, and maximise the positive, impacts that have been identified through the analysis. By considering and implementing these actions the policy or action can be refined to make sure that the greatest benefits are achieved for the people of Sunderland. The performance monitoring process should also be set out to explain how ongoing progress is going to be followed to make sure that the aims are met.

From the analysis four broad approaches can be taken, (No major change; continue with the policy/action despite negative implications; adjust the policy/decision/action; or stop the policy/action). Please indicate, using the list below, which is proposed.

No Major Change (**Yes**)

Continue Despite Negative Implications ()

Adjust the Policy/Decision/Project/Activity ()

Stop ()

Action Plan

[Further Guidance](#)

ACTION	WHO	WHEN	MONITORING ARRANGEMENTS
This Action Plan will be completed following the public consultation exercise.			

