



Medway Local Development Framework:

Core Strategy

Interim Diversity Impact Assessment

August 2011



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1. Medway Council's approach to the LDF and Diversity Impact assessment.

- 1.1 The Race Relations (Amendment) Act 2000 introduced a requirement to conduct race impact assessments. By law all policies and major service changes that could have an impact on black and minority ethnic (BME) groups need to be assessed.
- 1.2 Since then, similar statutory duties have been introduced in relation to disability and gender and the potential barriers to people having fair access to council services or employment.
- 1.3 The legal duties on local authorities¹ currently cover race, disability and gender only. However, the Diversity Impact Assessment (DIA) process at Medway Council has been designed so that it can consider other groups in the same way. Medway will identify impacts for customers due not only to their racial/ethnic group but, also, to their gender, or disability and asks about possible discrimination due to sexual orientation, age, religious belief and other factors.
- 1.4 The Core Strategy is the key document in the Local Development Framework (LDF) as it sets out the overall vision and strategy for place making and will provide the context for all subsequent Development Plan Documents and their policies. It sets out what Medway wants to achieve in different parts of the area to 2028 and how it will get there.
- 1.5 The information used to inform the Core Strategy is formed from two key elements, participation and studies. These are collectively referred to as the evidence base. This has included a number of background studies, community consultations, working with the Local Strategic Partnership, community groups and developers and agents.
- 1.6 The views of the local community and others who have a stake in the future of the area have helped influence the spatial strategy and vision set out in the Core Strategy, particularly through the Sustainable Communities Strategy. To ensure that participation has been constructive, the principles of effective community engagement in planning have been followed. This has meant that at each stage during the progress of the Core Strategy engagement has been continuous, proportional and appropriate².
- 1.7 To help produce an Equalities Impact Assessment an additional Code of Practice has been produced by the Equality and Human Rights Commission³ that details the procedure to enable a Local Authorities to

¹http://connections.medway.gov.uk/index/yourcouncil/businesssupport/8315.html/13053/10960/38810/38811.htm#downloadable_guidance_forms

² Worthing Borough Council EIA April 2010.

³

http://www.equalityhumanrights.com/uploaded_files/PSD/equality_impact_assessment_guidance_quick-start_guide.pdf

carry out an Equalities Impact Assessment that addresses the needs of all diverse communities.

- 1.8 There are two main sections to the procedure, the first being the Screening of relevant policies and once assessed if they do have an impact on BME groups, a full assessment.

Screening

- 1.9 A screening process is used to: identify the main aims of the policy; collect information and decide if the policy is relevant. Authorities should work on the assumption that all proposed policies are relevant to the race equality duty, until it has had a chance to screen them. Any changes a local authority makes to a policy should also be screened, to see if they have implications for meeting the duty. If a policy is relevant then a full assessment should be carried out on its impact on BME groups.

2. Medway Council's approach to the LDF and Initial Screening of Policy

- 2.1 Before any policies were formed or even considered an initial screening of issues took place in the spring of 2009. This included the following matters:

- Housing
- Retail
- Neighborhoods and Town Centres
- Sustainability and Climate change

- 2.2 Any race equalities relevance

At this early stage owing to the very general areas of possible policy under consideration, none of the topics could be assessed to have any direct race/equalities relevance. Nevertheless, key priorities and sustainability issues were put together using the documents contained in table 2 of the SAR⁴. This document was taken to the Advisory group of the Local Strategic Partnership who confirmed that subject to a few minor amendments, the Scoping report could go out to consultation to the bodies listed in Annex E1 of PPS12⁵. In the Scoping report a number of key documents were considered that relate to equalities and diversity matters. These included:

PPG3 (Housing): Meeting the housing needs of the entire community; and creating mixed communities

PPG17 (Planning for Open Space Sport and Recreation): Promote Social inclusion and community cohesion.

PPS1 (Delivering Sustainable communities): Ensuring development supports existing communities.

Sustainable Communities: Building for the Future: To ensure all social tenants have a decent home by 2010. To improve conditions for vulnerable people in private accommodation.

⁴ <http://www.medway.gov.uk/pdf/sustainability%20appraisal%20scoping%20report.pdf>

⁵ Office of the Deputy Prime Minister 2004 Planning Policy Statement 12 : Local Development Frameworks <http://www.odpm.gov.uk/index.asp?id=1143847>

Securing the Future: UK Sustainable Development Strategy: Social progress that recognises the needs of everyone. Reducing the level of social exclusion.

Bringing Britain together: A national strategy for neighbourhood renewal: investing in people, not just buildings; involving communities, not parachuting in solutions; developing integrated approaches with clear leadership; ensuring mainstream policies really work for the poorest neighbourhoods.

A new commitment to neighbourhood renewal — national strategy action plan: In all the poorest neighbourhoods, to have common goals of lower worklessness and crime and better health, skills, housing and physical environment. To narrow the gap on these measures between the most deprived neighbourhoods and the rest of the country.

For a full list of these documents and objectives see figure 4 of the SAR⁶.

3. Collection of Data and the Issues and Options Report

- 3.1 Through the collection of baseline data and examination of sustainability issues, a series of key issues were highlighted. In addition, discussions were held with external organisations and Medway Council officers to help to identify potential issues and options. These formed the basis of the Issues and Options Report⁷, which was published in July 2009 for consultation with those organisations listed within the Statement of Community Involvement (SCI)⁸. The Issues and Options Report outlined the main issues for Medway in relation to the Core Strategy and provided details of options for dealing with them. The Document contained a set of comprehensive questions addressing the main matters for consideration. In relation to community diversity and equalities matters questions were asked about Neighbourhoods, Cultural facilities, Social Care, Affordable Housing and Regeneration.
- 3.2 The above document was also accompanied by the Initial Sustainability Appraisal Report (ISAR) that sought to appraise these potential options. Each Strategic option was then assessed against the Sustainability Appraisal objectives.
- 3.3 A range of bodies concerned with race, gender, disability, age and religion were consulted such as:

Ahmadiyya Muslim Association	Age Concern Medway Ltd
Alzheimer's Society (Rainham (Kent) Support Group)	Apnar Ghar
Hindu Sabha	Ethnic Minority Forum
Kent Bangladesh Welfare Association	Frindsbury Hall Nursing Home
Kent Multicultural Community Association	Kent Association For Spina Bifida & Hydrocephalus
Kent Ramgarhia Darbar - Gurdwara	Kent Association For The Disabled
Kent Turkish Welfare Association	Kent Ethnic Minorities Disabilities Forum

⁶ <http://www.medway.gov.uk/pdf/sustainability%20appraisal%20scoping%20report.pdf>

⁷ http://medway-consult.limehouse.co.uk/portal/issues_and_options_report?pointId=794820

⁸ http://www.medway.gov.uk/sci_march_2006_statement_wl.pdf.

Medway Access Group	Kent Malayalee Association
Medway Afro Caribbean Association (Gillingham)	Kent Muslim Welfare Association
Medway Arthritis Self Help	Kent Refugee Action Network
Medway Hindu Centre	Kent Youth
Medway Mencap Society	Medway Inter Faith Action
Medway Racial Equality Council	Medway Towns Gurdwara Sabha
Punjabi International Cultural Society	Multiple Sclerosis Society (Medway Towns Branch)
Royal Association For Deaf People	Medway Ethnic Minority Forum
Showman's Guild of Great Britain	Sikh Sangat Gurdwara Association
Siri Guru Nanak Gurdwara	Sri Guru Ravidass Sabha
Strood Youth & Community Centre	Women's National Commission
Women's Aid	
Women's Support Service	

3.4 A copy of all the responses to the Issues and Options Report can be found at the Councils web page⁹ together with Officers responses.

4.0 Policy Formulation

4.1 As a result of the Issues and Options consultation¹⁰ and together with the Sustainable Assessment of the main strategic options the most sustainable option was chosen and draft policies written for the Pre-Publication Draft Core Strategy.

4.2 The general nature of Core Strategy policies means that their impact is wide-ranging and difficult to quantify. This is particularly so with regard to equalities matters. The significance of impacts is dependent on the location of development, as well as the magnitude and duration of those effects. Therefore, uncertainty exists in determining the precise nature and significance of some of the impacts identified for the generic policies.

5.0 Pre-Publication Draft Core Strategy (PPDCS)

5.1 In November through to December 2010 the PPDCS underwent its public consultation. For a full list of bodies see Appendix A. A Pre-Publication Draft Core Strategy consultation was carried out between Monday, 1st November 2010 and Friday, 10th December 2010. The results of this consultation can be seen in the Councils PPDCS Consultation document.

5.2 This included a range of bodies concerned with race, gender, disability, age and religion. A full list of consultees can be found in the PPDCS Consultation document. In addition to this some libraries and shopping centres had a one-day manned exhibition showing the documents and areas affected.

6. Draft Core Strategy

⁹<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/issuesandoptionsreport.aspx>

¹⁰<http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/issuesandoptionsreport.aspx>

6.1 All the responses from the PPDCS consultation were examined and responses made. Any equality issues were then highlighted and amendments made where necessary. However, as with previous rounds of consultation the policies and issues that were raised in the documents were exceptionally general and related to the population in Medway as a whole. Therefore, no equalities issues were identified.

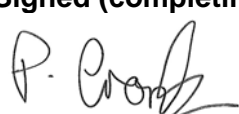
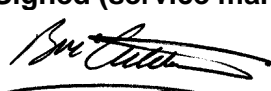
7. Diversity Impact Assessment: Screening Form

Directorate RCC	Name of Strategy Medway Core Strategy (LDF)		
Officer responsible for assessment Paul Cronk	Date of assessment July 2011	New or existing? Existing	
Defining what is being assessed			
1. Briefly describe the purpose and objectives	<p>To provide a spatial planning framework for Medway up to 2028.</p> <p>Medway's Core Strategy will be the main part of the Local Development Framework. It will:</p> <ul style="list-style-type: none"> • Establish the pattern of development over the next 17 years • Provide the basis for all key planning decisions • Tackle a range of issues that are relevant to local people and with the overall aim of improving our quality of life • Set out what needs to be done, by whom and how • Allocate land for 'strategic' developments • Set out a local environmental agenda • Provide the basis for significant improvements in our economic performance. <p>A Communication Plan will provide regular information to people in Medway about progress on LDF (in conjunction with SCS and LTP3).</p>		
2. Who is intended to benefit, and in what way?	<p>All residents, businesses, employees & visitors.</p> <p>Providing an improved environment to work, live and visit, and a framework to deliver a range of different strategies together.</p>		
3. What outcomes are wanted?	<p>An attractive Medway that meets the needs of Medway residents.</p> <p>Delivery of high quality homes, jobs, shops leisure.</p> <p>A safe environment for all.</p>		
4. What factors/forces could contribute/detract from the outcomes?	<ul style="list-style-type: none"> • Contribute • Active participation and buy in from the different parts of Medway Council. • Partnership working with outside bodies. 	<ul style="list-style-type: none"> • Detract • Economic downturn • Medway's existing image 	
5. Who are the main	Residents, Workers, Visitors, Developers, Businesses,		

stakeholders?	Community groups, Charities, Council (departments), LSP, National Organisations, Other Kent L.A.'s
6. Who implements this and who is responsible?	Development partners / infrastructure providers Medway Council - RCC

Assessing impact		
7. Are there concerns that there <u>could</u> be a differential impact due to <i>racial groups</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	Medway Racial Equality Council was consulted. No adverse comments have been received. The views of relevant groups have and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The Housing Strategy has elements within it that will meet the needs of disabled people. The views of relevant groups have and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	We have projected demographics for Medway covering the lifespan of the Core Strategy. The priorities as identified so far enable both males and females to benefit. The views of relevant groups will continue to be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
10. Are there concerns there <u>could</u> be a differential impact due to <i>sexual orientation</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
11. Are there concerns there <u>could</u> be a have a differential impact due to <i>religion or belief</i> ?	YES	Brief statement of main issue
	<u>NO</u>	

What evidence exists for this?	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
12. Are there concerns there <u>could</u> be a differential impact due to people's age?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The Youth Parliament was consulted. No adverse comments have been received. The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
13. Are there concerns that there <u>could</u> be a differential impact due to <i>being transgendered or transsexual</i> ?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The views of relevant groups have been and will be sought at appropriate stages of the strategy as it progresses. So far no adverse comments have been received.	
14. Are there any <i>other</i> groups that would find it difficult to access/make use of the function (e.g. young parents, commuters, people with caring responsibilities or dependants, young carers, or people living in rural areas)?	YES	If yes, which group(s)? A key feature of the Core Strategy is to improve the living and work conditions of more deprived areas of Medway. Although a wide range of consultation methods are used we do not always get as much feedback as we would like.
	NO	We let people know about the Core Strategy via a variety of means including the Council website, press releases, newspaper adverts/articles, exhibitions and workshops. We also use these means to keep people informed about what is happening. We also use LDF database and online consultation software to keep in touch with stakeholders. Medway Ambassadors have been used to help get the message passed on, as have a range of different community forums and groups.
What evidence exists for this?	There are hard-to-reach groups that are more difficult to actively involve in the production of the Core Strategy.	
15. Are there concerns there <u>could</u> have a differential impact due to <i>multiple discriminations</i> (e.g. disability <u>and</u> age)?	YES	Brief statement of main issue
	<u>NO</u>	
What evidence exists for this?	The views of relevant groups have been sought at appropriate stages as the strategy progresses. So far no adverse comments have been received.	

<u>Conclusions & recommendation</u>		
16. Could the differential impacts identified in questions 7-15 amount to there being the potential for adverse impact?	YES	Brief statement of main issue There could be adverse impacts if there is a failure to engage with and take on board the needs and requirements of particular groups.
	<u>NO</u>	
17. Can the adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or another reason?	<u>YES</u>	Please explain Regeneration activity will seek to reduce deprivation, raise skills levels
	NO	
Recommendation to proceed to a full impact assessment?		
NO	This policy change complies with the requirements of the legislation and there is evidence to show this is the case.	
<u>Action plan to make improvements</u>		
Outcome	Actions (with date of completion)	Officer responsible
Wider consultation to get better information upon which to plan	Seek views of e.g. Women in Enterprise and Medway Older People's partnership groups	Paul Cronk
Better quality information upon which to plan	To ensure analysis breaks down all survey data by equality strand (ethnicity, disability, gender, age etc)	Tim Stephens
Planning ahead: Reminders for the next review		
Date of next review	Prior to next stage.	
Areas to check at next review (e.g. new census information, new legislation due)	Legislation Changing demographics	
Signed (completing officer/service manager)	Date	21 st July 2011
		
Signed (service manager/Assistant Director)	Date	27 July 2011
		

Related Documents: