

SKEGNESS NEIGHBOURHOOD DEVELOPMENT PLAN - EQUALITIES IMPACT ASSESSMENT

Author: Kay Turton

Date: October 2020

The 9 Protected Characteristics are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief (including lack of belief)
- Gender/Sex
- Sexual orientation

Introduction

- Why it is being done – The preparation of the Skegness Neighbourhood Development Plan (NDP) is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Skegness NDP will be “made” (adopted) by East Lindsey District Council once it had passed through the formal stages of its preparation under the Neighbourhood Planning (General) Regulations 2012.
- What is the expected outcome – Once the Skegness NDP it will be “made” by the District Council and will become part of the development plan for the District. It therefore has to conform to the appropriate legislative, regulatory and administrative procedures.
- How it will be delivered – It will be delivered through the determination of planning applications submitted to East Lindsey District Council.
- Who is likely to be affected: The Council’s 2 equality objectives are: 1. Enabling people to get actively involved in their community; and 2. Improving equality of opportunity and life chances.

The Skegness NDP positively contributes to these objectives, the preparation of the Plan seeks to involve people in developing the policies for their area, enabling the community of Skegness to be actively involved in policies for the town. A number of the policies seek to equality of opportunity, for example in terms of access to appropriate housing.

Potential impacts

Table 2 below sets out the impacts, positive and negative, on each of the protected characteristics set out above. Table 3 below sets out the background to the identified impacts, positive and negative, of each objective and policy.

Initial Evidence

What evidence do we have so far and where from – service information, customer information, other sources?

The Council assesses the makeup of its communities (and types of communities, e.g. businesses, visitors) through the use of the latest Census data and other sources such as the Lincolnshire Research Observatory and NOMIS.

Table 1

Equality Group	East Lindsey Position
Race	93.5% of Skegness's population is white British, which is significantly above the regional and national averages. White other makes up the next largest group at 3.6% and then white Irish at 0.5%. Asian/Asian British and Mixed/multiple ethnic groups form 1.0% and 0.9% of the population respectively but when they are broken down into the groups making up these classifications, none total more than the different white residents.
Gender (sex)	The 2011 census 47.8% of the population is male and 52.2 is female which means there are marginally more women in the town that the Regional and National average.
Age	Skegness has an aging population with 40.5% being over 65, as opposed to 30.7% in East Lindsey, 24.7% in Lincolnshire, 17% regionally and 16.5% nationally.
Religion	In the 2011 census, 68.2% of the population identified themselves as Christian, which is consistent with the rest of East Lindsey but slightly higher than the regional and national averages. The next largest groups was those with no religion at 24.9% and those who did not state at 6.9%. Other faith groups represented were Muslims 0.5%, Buddhists 0.2%, Hindu 0.1%, Jewish 0.1% and other faiths not specified at 0.4%. This is consistent with the picture across East Lindsey.
Disability	33.9% of households in Skegness contain a person with a long term health problem or disability; compared to 30.9 in East Lindsey, 26.2% in the East Midlands and 25.65% nationally.

Sexual Orientation	Statistics on sexual orientation are not easy to identify. The census has a category for same sex partnership couples, but this will not include those co-habiting with no formal arrangements, those choosing to enter into marriage under 2014 legislation, those in single person household, or those forming part of other households. The figure for same sex civil partnership in 2011 census was 0.2% which reflected the numbers elsewhere.
Gender reassignment	There is no data on the number of individuals undergoing gender reassignment. However, based on the national picture, numbers are likely to be a small. Due to the sensitive nature of the issues facing this group, it may be that the extent of the community's representation cannot be established.
Pregnancy and Maternity	The birth rate among the women over the age of 15 in the UK in 2105 was 61 births per 100,000, for Lincolnshire this was 61.1. There is no data for Skegness but for East Lindsey the figure was 59.88 meaning women in the District are having children at less than the national statistical rate. However, given that there is a higher prevalence of older residents in Skegness, the figure may be lower.
Marriage and Civil Partnership	Married persons accounted for 45.3% of the population of Skegness. This was 53.6% for East Lindsey population in the 2011 census, regionally this figure is 48.5 and nationally 46.6%.The figure for civil partnership in 2011 census was 0.2% which reflected the numbers elsewhere.

- Who has been engaged / consulted so far and the methods used
 - The Skegness NDP group has carried out a number of consultation events. *Have they consulted number of other voluntary or representative groups, such as those representing disability or health groups and children's groups, all of these have been consulted on the Plan at every stage.?????*
- What have we learned and the issues identified so far
 - *This section needs completing with data from consultation exercises.*

Identified impacts

Table 2 – Impact on Protected Characteristics

Detailed Impact Assessment					
Characteristic	Positive impacts	Adverse / negative impacts	How consulted	Feedback from all consultation phases	Response to the feedback / mitigation
Age	<p>Policy H3 supports the development of specialist older persons housing.</p> <p>Policy C1 supports the protection of community facilities and open spaces in Skegness and requires Health Impact Assessment for major development, which may benefit people with some of the protected characteristics, if they have greater need to access the Health Service than the rest of the population.</p> <p>Policy C2 supports the development of new community facilities and public spaces and specifically refers to youth facilities and facilities for older people.</p> <p>Policy C3 seeks to support existing and new community health facilities, including a criterion encouraging</p>	None	Need list of groups consulted and means of consultation	????	????

	specialist accommodation for older people to incorporate these facilities.				
Disability	<p>Policy TC3 includes a criterion that states that doorways in the shop front should be compliant with requirements for access which will be of positive benefit for some disabled users groups.</p> <p>INF8 covers parking needs of disabled residents and visitors.</p> <p>H3 supports the development of specialist older persons housing, which may also benefit some people with a disability.</p> <p>Policy C1 supports the protection of community facilities and open spaces in Skegness and requires Health Impact Assessment for major development, which may benefit people with some of the protected characteristics, if they have greater need to access the Health Service</p>	<p>The objective to relocate car parking from within the town centre. Although the improved pedestrian circulation could also benefit users of wheel chairs and mobility scooters, and some other disability groups, this could make it harder for some disabled people to access the town centre. Although there is a balance here between the positive and negative outcomes, the loss of parking spaces specifically for the disabled could disproportionately affect this group and this needs to be considered in any alternative parking arrangements.</p>	Need list of groups consulted and means of consultation	????	????

	<p>than the rest of the population.</p>	<p>Policy INF12 protects existing car parking but requires that additional demand for public car parking should in the first instance be met through public transport, including park and ride, before new car parks are considered. Accessing to public transport can be a challenge to passengers with mobility needs. It would be helpful if the plan could reflect the challenges this may bring to some disabled users by reference in the supporting text of the policy or policy NDP3, which allocates a site for a park and ride facility.</p> <p>Policy D2 sets out criteria for the design of new car parks, including a potential park and ride facility. There are no references to the needs</p>			
--	---	---	--	--	--

		of disabled users in the policy.			
Gender reassignment	None	None	Need list of groups consulted and means of consultation	????	????
Marriage and civil partnership	None	None	Need list of groups consulted and means of consultation	????	????
Pregnancy & maternity	Policy C1 supports the protection of community facilities and open spaces in Skegness and requires Health Impact Assessment for major development, which may benefit women who are, or have recently been, pregnant.	None	No local Need list of groups consulted and means of consultation	????	????
Race	None	None	Need list of groups consulted and means of consultation	????	????
Religion or belief	None	None	Need list of groups consulted and means of consultation	????	????
Gender/Sex	None	None	Need list of groups consulted and means of consultation	????	????
Sexual orientation	None	None	Need list of groups consulted and means of consultation	????	????

Table 3 – Individual Policy Assessment

Policy	Equality Group Affected	Commentary
<p>Vision “Skegness will continue to be a thriving coastal town, expanding upon its well established tourism and leisure offer, with an increasingly diverse economy. The town will be a desirable place for families to live and prosper and attract visitors throughout the year.”</p>	None	<p>The vision seeks to encourage Skegness to develop as a thriving town. Although specifically mentioning families in the vision, this is not to the exclusion of other people and those characteristics that are likely to create a desirable place for families to live are also likely to attract other people to the town.</p>
<p>Economy Identify additional employment areas which will cater for emerging sectors within Skegness and the wider region. Attract a university or college campus which would benefit from the town’s well established tourism industry.</p>	None	<p>Any outcome of these objectives will be felt equally across the community and will not disproportionately benefit or negatively effect one group.</p>

<p>Identify a suitable location for a transport hub to serve both passengers and goods.</p>		
<p>Social Attract and retain skilled and professional people and families to the town. Maximise previously developed sites for new housing. Address the redevelopment of B&Bs. Restrict the development of Houses in Multiple Occupation (HMOs) throughout the town. Provide more affordable housing within the town to meet locally identified needs.</p>	<p>None</p>	<p>Any outcome of these objectives will be felt equally across the community and will not disproportionately benefit or negatively affect one group.</p>
<p>Retail, Leisure and Tourism Relocate car parking within the town to improve pedestrian circulation and create new development opportunities.</p>	<p>Disability</p>	<p>Relocating existing car parking away from the town centre could make it harder for some disabled people to access the town centre, although the improved pedestrian circulation could also benefit users of wheel chairs and mobility scooters. It will have to be ensured that the access from the new car park locations caters for the needs of those with disabilities.</p> <p>Similarly the Pedestrianisation of Lumley Road could bring benefits for some disability groups although there is a balance here with the loss of parking spaces</p>

<p>Make improvements along the Foreshore Identify and improve the town "Gateways". Encourage the re-let of small units in the town centre for retail purposes. Expand the offer of leisure and tourism within Skegness to create an attractive, year round resort. Ensure that caravan development needs can be met in a sustainable way through the Neighbourhood Development Plan (NDP) period. Pedestrianisation of Lumley Road.</p>		<p>(including those specifically for the disabled) could disproportionately affect this group and this needs to be considered in any alternative parking arrangements.</p>
<p>E1 Starter business Floorspace</p>	<p>None</p>	<p>This policy seeks to support the development of starter units for business and any outcome of this policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.</p>
<p>E2 New Employment Floorspace</p>	<p>None</p>	<p>This policy seeks to support new employment opportunities within Skegness and any outcome of this policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.</p>
<p>E3 Redevelopment of Employment Sites for Other uses</p>	<p>None</p>	<p>Policy E3 supports the reuse of buildings for employment uses and protects business premises for such uses. Any outcome of this policy will be felt equally</p>

		across the community and will not disproportionately benefit or negatively affect one group.
E4 New Education Uses	None	Although the supporting text to this policy specifically refers to the needs of 16 – 24 age group, there is nothing in the policy to suggest that education, skill and training establishments coming forward under this policy would be age restricted and therefore open to a wider audience.
Policy V1 Tourism and Visitor Economy	None	The policy seeks to support tourism-related development within the town, subject to criteria. These include a criterion seeking to improve access and movement for pedestrians and cyclists. Although this does not specifically refer to the needs of those with a disability, the creation of coherent spaces that enable connectivity has the potential to assist those with mobility needs or those with difficulty navigating cluttered spaces or those who struggle with visuoperception and disorientation.
V2 Loss of Visitor Accommodation	None	Policy V2 seeks to protect existing serviced holiday from loss and any outcome of this policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.
V3 Applications or Overnight Tourist Accommodation	None	Policy V3 establishes criteria for new serviced holiday accommodation and the outcome of the policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.
TC1 Active Shopping Frontages in the Town Centre	None	Policy TC1 seeks to support the vitality and viability of Skegness town centre by retaining A1 retail uses and, outside the primary shopping frontage, other uses complementary to the town centre. The outcomes of the policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.
TC2 Town Centre Upper Floor Developments	None	Policy TC2 supports the creation of residential accommodation in upper floors in the town centre, where this does not compromise the commercial ground floor use. Although upper floor accommodation may not be accessible by some disability groups, this accommodation will provide a very small percentage of

		the housing stock in the town and the principle purpose of the policy is to seek to support and enliven the town centre by utilising vacant space in buildings.
TC3 Design of Shop Frontages and Foreshore Frontages	Disability	Policy TC3 relates to the design of shop frontages in the town centre and foreshore. While most of the criteria pertain to aesthetic considerations and the character of the relevant area, one criteria states that doorways in the shop front should be compliant with requirements for access which will be of positive benefit for some disabled users groups.
INF1 Sustainable Transport	None	Policy INF1 supports applications that minimise the need to travel, contribute to safe, accessible and attractive cycle and pedestrian routes, and provide links to pedestrian and cycle routes or public transport hubs. Although not specifically referring to people with disabilities, the improvement to pedestrian and cycle routes may also benefit some disability groups by providing safe, level routes around the town to access facilities.
INF2 Car Parking Standards for New Residential Development (Use Class C3)	None	Policy INF2 sets out car parking standards for new residential development and any outcome of this policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.
INF3 Car Parking Standards for New Houses in Multiple Occupancy (HMOs)(Use Classes C4 and Sui Generis)	None	Policy INF3 sets out car parking standards of new Houses In Multiple Occupation and any outcome of this policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.
INF4 Parking Standards for New Hotels, Guest Houses and B&B (Use Class C1)	None	INF4 set car parking standards for new serviced holiday accommodation and any outcome of this policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.
INF5 Car Parking Standards for Non-Residential Development	None	Policy INF5 sets parking standards for non-residential development, however, it does not include any standards for disabled parking spaces. This is addressed by a separate policy INF8.

INF6 Parking on Public Highways (Non-Residential and Services Tourist Accommodation Uses)	None	Policy INF6 considers the impact on parking on public highways from non-residential and serviced holiday accommodation. It is likely that the outcome of this policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.
INF7 Parking for Service and Delivery Vehicles	None	Policy INF7 considers parking for service and delivery vehicles and there is nothing in the policy that would inherently impact on any of the equality groups.
INF8 Disabled Parking Standards for New Developments	Disability	INF8 covers parking needs of disabled residents and visitors and seeks to make appropriate levels of provision for disabled vehicle users, thereby providing additional support for people with this protected characteristic.
INF9 Motorcycle Parking Standards for New Development	None	Policy INF9 sets the level of motorcycle parking required in new development. It is likely that the outcome of this policy will be felt equally across the community and will not disproportionately benefit or negatively affect one group.
INF10 Cycle Parking Standards for New Developments	None	Similarly, INF10 addresses cycle parking and its effects should not be disproportionately felt by one group.
INF11 Ultra Low Emission Vehicles (ULEV Parking Standards and Future Provision)	None	Policy INF11 looks to ready Skegness for the forthcoming increase in Ultra Low Emission Vehicles by providing charging points or the infrastructure to enable their installation in the future. The effects of this policy should not be disproportionately felt by one group.
INF12 Public Car Parking Provision	Disability	Policy INF12 protects existing car parking but requires that additional demand for public car parking should in the first instance be met through public transport, including park and ride, before new car parks are considered. There are some inherent difficulties for some disabled users in accessing public transport, be this getting on to the bus or train, or there being sufficient space within the bus or train to accommodate passengers with mobility needs. If local bus services and park and ride are to be the first choice for providing for increased demand, then it would be helpful if the plan could reflect the challenges this may bring to some disabled users by reference in the supporting

		text of the policy or policy NDP3, which allocates a site for a park and ride facility.
Policy H1 Redevelopment of Existing Buildings for affordable Residential Use	None	The policy sets criteria for the redevelopment of buildings for affordable residential development. The effects of this policy should not be disproportionately felt by one group. Other legislation deals with physical changes to buildings and letting policy in terms of Equalities matters.
H2 Infill Development	None	Policy H2 sets the criteria for small new residential development on infill plots. Criteria are largely spatial and policy should not be disproportionately felt by one group.
H3 Older Persons Accommodation	Age, Disability	As policy H3 supports the development of specialist older persons housing, it will bring benefits for some people with this protected characteristic who become residents of the accommodation, along with some residents who also have some disability.
C1 Existing Community Facilities (non-health related) and Public Open Spaces	Age, Disability, Pregnancy and Maternity	Policy C1 supports the protection of community facilities and open spaces in Skegness which will benefit the whole population. The policy requires Health Impact Assessment for major development, which may benefit people with some of the protected characteristics, if they have greater need to access the Health Service than the rest of the population.
C2 New Community Facilities (non-health related) and Public Spaces	Age	Policy C2 supports the development of new community facilities and public spaces and specifically refers to youth facilities and facilities for older people, so specifically benefitting these groups. However, the policy does not solely relate to these types of development and will benefit the whole community in accessing services and open space in the town.
C3 Community Health Facilities	Age	Policy C3 seeks to support existing and new community health facilities. Criteria relate to accessibility, compatibility with its surroundings and parking. There is also a criteria encouraging specialist accommodation for older people to incorporate these facilities. This means that there potentially be a marginal benefit to older residents over and above that wider community benefits of the policy.

D1 Design in New Developments	None	Policy D1 sets design based criteria for all development and policy should not be disproportionately felt by one group. One criterion seeks a positive contribution to enhancing legibility and wayfinding in Skegness Town Centre. Although this does not specifically refer to the needs of those with a disability, the creation of urban design that improves movement around the town centre and transition between different areas and spaces may assist those with difficulty navigating spaces or those who struggle with visuoperception and disorientation.
D2 Design of New Car Parking	Disability	Policy D2 sets out criteria for the design of new car parks, including those in residential development, and a potential park and ride facility. There are no references to disabled parking in the policy. Provision of disabled spaces, in terms of number of spaces, is provided elsewhere in the Plan but policy D2 doesn't make any specific design requires in terms of location of spaces within the car parks. Poorly located space can create additional difficulties for disabled users, even if the bay themselves are designed to an acceptable standard.
D3 Gateway Sites and Edge of Settlement Development	None	Policy D3 relates to development at gateway sites within and at the entrance to Skegness. The effects of this policy should not be disproportionately felt by one group.
D4 Local Green Spaces	None	Policy D4 protects identified area so of green space from loss and the policy should not be disproportionately felt by one group.
NDP1 Skegness Council Offices, North Parade	None	This policy provides the criteria for the redevelopment of the Council Offices on North Parade for leisure and/or community uses or affordable housing. The policy does not include any requirements that would negatively affected any of the groups with protected characteristics.
NDP2 Skegness Fire Station and 8no. Firemen Houses, Churchill Avenue	None	This policy provides the criteria for the redevelopment of the Fire Station site on Churchill Avenue for employment uses or affordable housing. The policy does not include any requirements that would negatively affected any of the groups with protected characteristics.

NDP3 Land north of Wainfleet Road	None	This policy provides the criteria for the provision of employment and/or a park and ride facility on Wainfleet Road on the edge of Skegness. The policy does not include any requirements that would negatively affected any of the groups with protected characteristics.
NDP4 Skegness Household Waste Recycling Centre, Warth Lane	None	This policy provides the criteria for the redevelopment of the Skegness Household Waste Site for employment uses or affordable housing. The policy does not include any requirements that would negatively affected any of the groups with protected characteristics.

Summary

Where policies are likely have an impact (positive or negative) on one of the identified equality groups, it is on the ground of age (primarily the older members of society) or those with a disability. In part, this is because disability and older age groups have a larger representation in Skegness, and training and education opportunities for young people have been identified as a priority, so a number of policies have been specifically tailored to address their needs. There are a few instances where there may be a positive outcome for one of the groups (again primarily age and/or disability) as a bi-product of the policy rather than as a direct objective of or statement in the policy. These have not been singled out but are brought out in the commentary. It is not felt that any policy would directly discriminate against any of these groups. Often the impacts, positive or negative, of the policies are felt across society and are not felt more strongly by one group than another. However, there is one objective and two policies where there may be an impact.

The objective in question is that of relocating car parking within the town centre. Although the improved pedestrian circulation could also benefit users of wheel chairs and mobility scooters, and some other disability groups, this could make it harder for some disabled people to access the town centre as on-street (and off street) disabled parking bays are provided within the town centre. Although there is a balance here between the positive and negative outcomes, the loss of parking spaces specifically for the disabled could disproportionately affect this group and this needs to be considered in any alternative parking arrangements.

Policy INF12 protects existing car parking but requires that additional demand for public car parking should in the first instance be met through public transport, including park and ride, before new car parks are considered. Accessing to public transport can be a challenge to passengers with mobility needs. If local bus services and park and ride are to be the first choice for providing for increased demand, then it would be helpful if the plan could reflect the challenges this may bring to some disabled users by reference in the supporting text of the policy or policy NDP3, which allocates a site for a park and ride facility.

Policy D2 sets out criteria for the design of new car parks, including a potential park and ride facility. There are no references to disabled parking in the policy. Provision of disabled spaces, in terms of number of spaces, is provided elsewhere in the Plan but policy D2 doesn't make any specific design requires in terms of location of spaces within the car parks. Poorly located spaces can create additional difficulties for disabled users, even if the bay themselves are designed to an acceptable standard.

Conclusions – See summary above

Monitoring – The Skegness Neighbourhood Development Plan will be subject to monitoring once it becomes part of the Development Plan.