East Suffolk Council - Suffolk Coastal Local Plan

Main Modifications Consultation

Equalities Impact Assessment

April 2020

Under Section 149 of the Equality Act 2010 the Council, as a public authority, must in the exercise of its functions have due regard to the need to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Protected Characteristics covered by the Act are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Through the production of the Local Plan the Council has undertaken Equalities Impact Assessments to assess and inform its policies. This assessment considers any equalities impacts related to Main Modifications consultation.
Page 12 of the Council’s Statement of Community Involvement\(^1\) sets out the measures that the Council would take at Regulation 19 (Publication of the Local Plan). These are the measures which it would also usually take at the Main Modifications consultation stage (for which there are no specific regulations or requirements). An Equality and Diversity Impact Assessment was undertaken as part of the production of the Statement of Community Involvement.

Due to current Covid-19 social distancing measures the Council is unable to undertake all consultation measures in the usual way. The Council is unable to make hard copies of consultation documents available in libraries or in Council offices which are currently closed to the public. The Council is also aware that the Covid-19 circumstances may affect the time and arrangements individuals or groups may have to be involved in the consultation.

The Council contacts those on its planning policy consultation database at the outset of its consultations. The consultation database contains individuals and organisations, including organisations representing those who would fall within the protected characteristics.

The assessment below sets out whether this would potentially have a specific impact on those with Protected Characteristics or on other groups, and considers measures to address this impact with a view to ensuring that consultees can engage in a fair and equal way.

Reference has been made to the Government’s ‘Guidance on social distancing for everyone in the UK’ (updated 30\(^{th}\) March 2020) and to Government’s separate guidance for those considered to be clinically extremely vulnerable (updated 17\(^{th}\) April). Presently the overarching approach is that people should only go outside for food, health reasons or work (if you cannot work from home) and with libraries and Council offices closed there are impacts on the ability of all groups to access facilities in the usual way. For those classed as clinically extremely vulnerable the advice is to not leave home.

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>Potential impact</th>
<th>Alternative measure</th>
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<tbody>
<tr>
<td>Age</td>
<td>Those who are aged 70 or over are differentiated in the guidance dated 30(^{th}) March as being within the group who should be particularly stringent in following social distancing measures. Older people are more likely to be classed as clinically extremely vulnerable. Older people are more likely to be those who are ‘shielding’ under the guidance for those who are clinically extremely vulnerable.</td>
<td>The Council will publish details of how the planning policy team can be contacted. Should anyone be unable to submit a response online or by email and be unable to leave their home to post a response the Council will consider bespoke measures on a case by case basis to enable people to respond. E.g. On request, an East Suffolk Council volunteer collecting the letter.</td>
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\(^{1}\) How to get involved in local planning – Statement of Community Involvement (Suffolk Coastal District Council, September 2014)
| **Disability** | Those with disabilities may be likely to have serious underlying health conditions or to be classed as clinically extremely vulnerable. They may be more likely to be those who are ‘shielding’ i.e. are advised to not leave home. As libraries and Council offices are closed to all this does not in itself affect the ability to view documents in a disproportionate way. This may however impact on the ability to post responses for those without Internet or email access.

There may be a higher proportion of older people without access to the Internet, and who would usually be able to view documents in the library.

| **Gender reassignment** | It is not considered that this group would be impacted in any disproportionate way.

| **Marriage and civil partnership** | It is not considered that this group would be impacted in any disproportionate way.

| **Pregnancy and maternity** | Those who are pregnant are differentiated in the guidance dated 30th March as being within the group who should be particularly stringent in following social distancing measures. As

For those who are unable to access the documents via the Internet, the Council will offer to post documents free of charge.

The consultation is being held for an extended period of ten weeks which would provide additional time to respond when compared to the usual six weeks.

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| Libraries and Council offices are closed to all. This does not affect the ability to view documents in a disproportionate way. This may however impact on the ability to post responses for those without Internet or email access and who are staying at home. | Council will consider bespoke measures on a case by case basis to enable people to respond. E.g. On request, an East Suffolk Council volunteer collecting the letter. The consultation is being held for an extended period of ten weeks which would provide additional time to respond when compared to the usual six weeks. |

| Race | It is not considered that this group would be impacted in any disproportionate way. |
| Religion or belief | It is not considered that this group would be impacted in any disproportionate way. |
| Sex | It is not considered that this group would be impacted in any disproportionate way. |
| Sexual orientation | It is not considered that this group would be impacted in any disproportionate way. |

The measures set out above, related to the provision of hard copies of documents, are not limited to the groups mentioned and it is acknowledged that this may be relevant to other groups, including those living in rural areas who may have more limited broadband connectivity.

The Council will review this assessment should the social distancing guidance change to an extent that would impact on the measures being taken for the consultation.