



**Medway Local Development
Framework:
Core Strategy
Diversity Impact Assessment**

December 2011

Contents

- 1. Medway Council's approach to the LDF and Diversity Impact assessment**
- 2. Medway Council's approach to the LDF and Initial Screening of Policy**
- 3. Collection of Data and the Issues and Options Report**
- 4. Policy Formulation**
- 5. Pre-Publication Draft Core Strategy (PPDCS)**
- 6. Publication Draft Core Strategy**
- 7. Submission Draft Core Strategy**
- 8. Diversity Impact Assessment: Screening Form**

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 authorities 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 Medway 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 Medway Sustainable Community Strategy¹ (2010). 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 appropriate, carried out from the outset, continuous, transparent and accessible and planned as an integral part of the plan making process².
- 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 Authority to carry

¹ http://www.medway.gov.uk/pdf/sustainable_com_strategy_web.pdf

² <http://www.communities.gov.uk/documents/planningandbuilding/pdf/pps12lsp.pdf>

³ http://www.equalityhumanrights.com/uploaded_files/PSD/equality_impact_assessment_guidance_quick-start_guide.pdf

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
- Neighbourhoods 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 a range of research, strategy and policy documents. These are set out in Table 2 of the Medway Sustainability Appraisal Scoping Report (2008)⁴. 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 government planning guidance on plan making (originally defined in Annex E1 of PPS12⁵). In the Scoping Report a number of key national policy 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.

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>

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.

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.

A full list of these documents and objectives is included in the Medway Sustainability Appraisal Scoping Report³.

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 Report⁶, which was published in July 2009 for consultation with those organisations listed within the Statement of Community Involvement (SCI)⁷. 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 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

⁶ http://medway-consult.limehouse.co.uk/portal/issues_and_options_report?pointId=794820

⁷ <http://www.medway.gov.uk/pdf/SCI%20Aug%202011.pdf>

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
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 Council's web page⁸ together with the responses of the planning officers.

4.0 Policy Formulation

4.1 As a result of the Issues and Options consultation⁹ and together with the Sustainability 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 strategic nature of Core Strategy planning policies means that their impact is wide-ranging and can be 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.

4.3 The objectives of the Core Strategy have been designed to deliver balanced growth, bringing the benefits of regeneration to all sectors of the community, and retaining and developing infrastructure, services and facilities needed to support a good quality of life for all people living in, working in or visiting Medway. The council sought to involve a diverse range of people in the development of the Core Strategy. There was a multi-channel media approach

⁸ <http://www.medway.gov.uk/environmentandplanning/developmentplan/localdevelopmentframework/corestrategy/issuesandoptionsreport.aspx>

⁹ <http://www.medway.gov.uk/pdf/I&O%20Public%20Consultation%20Report%20Aug%202009%20Iss%204.pdf>

¹⁰ <http://www.medway.gov.uk/pdf/PPDCS%20Public%20Consultation%20Report%20Nov-Dec%202010%20Iss%204.pdf>

in promoting key stages of work, and direct discussions with stakeholders throughout the process.

5.0 Pre-Publication Draft Core Strategy (PPDCS)

- 5.1 A Pre-Publication Draft Core Strategy consultation was carried out from 1st November 2010 to 10th December 2010. The results of this consultation can be seen in the Council's PPDCS Consultation document¹⁰.
- 5.2 This consultation 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 staffed exhibition showing the documents and areas affected, to reach a wide cross section of the local community.

6. Publication Draft Core Strategy

- 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 strategic and related to the population in Medway as a whole. Therefore, no equalities issues were identified.
- 6.2 The council carried out a six week consultation on the Publication Draft Core Strategy from 30 August to 14 October 2011, using the database of consultees established at the PPDCS stage. The representations received have been considered in producing the Submission Draft Core Strategy.

7. Submission Draft Core Strategy

- 7.1 The Submission Draft Core Strategy has been produced following consideration of the representations received to the consultation on the Publication Draft. There were not found to be any comments received that required changes to be made to the document in response to equalities issues.

8. Diversity Impact Assessment: Screening Form

Directorate RCC	Name of Strategy Medway Core Strategy (LDF)		
Officer responsible for assessment Catherine Smith	Date of assessment December 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 		

	<ul style="list-style-type: none"> • 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 in which 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?	<table border="1"> <tr> <td> <ul style="list-style-type: none"> • Contribute • Active participation and buy in from the different parts of Medway Council. • Partnership working with outside bodies. </td> <td> <ul style="list-style-type: none"> • Detract • Economic downturn • Medway's existing image </td> </tr> </table>	<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
<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 stakeholders?	<p>Residents, Workers, Visitors, Developers, Businesses, Community groups, Charities, Council (departments), LSP, National Organisations, Other Kent L.A.'s</p>		
6. Who implements this and who is responsible?	<p>Development partners / infrastructure providers</p> <p>Medway Council</p>		

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
	NO	
What evidence exists for this?	<p>The policies apply to all sections of the community. Medway Human Rights and Equality Council was consulted. No adverse comments have been received.</p> <p>The plan recognises the housing needs for gypsies and travellers.</p> <p>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.</p>	

8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	<p>The policies apply to all sections of the community. The Housing Strategy has elements within it that will meet the needs of disabled people. There is also recognition of community needs in the policy concerning health and social infrastructure.</p> <p>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.</p>	
9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	<p>The policies apply to all sections of the community. 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.</p> <p>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.</p>	
10. Are there concerns there <u>could</u> be a differential impact due to <i>sexual orientation</i> ?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	<p>The policies apply to all sections of the community. 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.</p>	
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
	NO	
What evidence exists for this?	<p>The policies apply to all sections of the community. There is recognition of community needs, including places of worship, in the policy concerning health and social infrastructure.</p> <p>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.</p>	
12. Are there concerns there <u>could</u> be a differential impact due to people's <i>age</i> ?	YES	Brief statement of main issue
	NO	

What evidence exists for this?	<p>The policies apply to all sections of the community. The Youth Parliament and groups concerned with the interests of older people were consulted. No adverse comments have been received.</p> <p>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.</p>	
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
	NO	
What evidence exists for this?	<p>The policies apply to all sections of the community. 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.</p>	
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	<p>If yes, which group(s)?</p> <p>The policies apply to all sections of the community.</p> <p>A key feature of the Core Strategy is to improve the living and work conditions of more deprived areas of Medway, and to ensure that local communities are well served by services and facilities. The plan includes policies focused on the sustainability of Medway's rural areas, supporting the retention and development of village services. There was specific consultation carried out with rural communities, including parish councils and wider community groups.</p>
	NO	<p>However it is recognised that despite the use of a wide range of consultation methods, the interests of some groups in the community may be under-represented.</p>
What evidence exists for this?	<p>It is recognised that there are hard-to-reach groups that are more difficult to actively involve in the production of the Core Strategy, but efforts have been made to consider their needs as part of the plan making process, and to ensure that the development objectives benefit all in Medway.</p>	
15. Are there concerns there <u>could</u> have a differential impact due to <i>multiple discriminations</i> (e.g. <u>disability and age</u>)?	YES	Brief statement of main issue
	NO	
What evidence exists for this?	<p>The views of relevant groups have been sought at appropriate stages as the strategy progresses. So far no adverse comments have been received.</p>	
Conclusions & recommendation		
16. Could the differential impacts identified in questions 7-15 amount to	YES	<p>Brief statement of main issue</p> <p>There could be adverse impacts if there is a</p>

there being the potential for adverse impact?	NO	failure to engage with and take on board the needs and requirements of particular groups.
17. Can the adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or another reason?	YES	Please explain Regeneration activity will seek to reduce deprivation, raise skills levels and bring benefits to all of Medway's communities.
	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	Catherine Smith
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 – Adoption of Core Strategy (anticipated summer 2012)	
Areas to check at next review (e.g. new census information, new legislation due)	Legislation Changing demographics	
Signed (completing officer/service manager) : 	Date	12 December 2011
Signed (service manager/Assistant Director) 	Date	12 December 2011

Related Documents: