

PLAN: MK AND SITE ALLOCATIONS PLAN EqIA

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This is an Equality Impact Assessment to inform the development of Plan: MK and Site Allocations Plan. Under equality legislation, the Council has a legal duty to pay 'due regard' to the need to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups.

The duty to pay 'due regard' is required to be demonstrated in the decision making and the implementation process. Assessing the potential equality impact of proposed projects that are part of the programme is the means by which we show 'due regard'.

1. Introduction

In large programmes such as this, the council has found it useful to have an EqIA that outlines some of the key equality issues. The aim is to have a brief, useful document that spotlights relevant issues and the particular groups of people who will need particular regard.

2. People affected

The Site Allocations Plan is being prepared to support the delivery of the Milton Keynes Core Strategy (adopted July 2013), to maintain a five year land supply of deliverable housing sites. Cabinet is recommended to approve the Site Allocations Plan: Issues and Options document for an eight-week consultation period.

When adopted, Plan: MK will be the new Local Plan for Milton Keynes, reviewing and replacing the Core Strategy and the saved policies of the existing Milton Keynes Local Plan. It will include an overarching development strategy for the Borough, development management policies to be used in the determination of planning applications and site allocations for various sorts of land uses.

3. The topics assessed

3.1 Site Allocation Plan

The Site Allocation Plan contains a vision and objectives. The key aim in terms of advancing equality will be that site allocation is linked to good transport links and employment opportunities.

There is reason to believe that the plan has positive aspects, but these need to be better reviewed within the plan. By virtue of their close proximity to key public transport routes, new homes will also have contributed to maximising access to travel and employment, yet this is not specifically mentioned. The relevant people factors are included in the Site Allocation Assessment Framework.

3.2 Issues Consultation

There are some issues that need further consideration. These are:

The Building of Cohesive communities:

Neighbourhoods can either thrive or struggle. Residents' ability and willingness to address local problems are influenced by their emotional commitment to their community places. These bonds are critical to the wellbeing of neighbourhoods, as they can motivate residents to participate in their communities and work to improve and protect them. It is essential for those working in community improvement and planning to better understand those emotional connections to place, how they are fostered, and how they might lead to action and effective planning processes.

Inclusiveness by design:

Imrie and Hall (2000) quote a respondent to a survey as stating "schools of architecture pay only lip service to building standards and access for disabled people is generally thought of as providing ramps." This is rather a harsh criticism, but if there is any truth in this statement, it may be because of the association of inclusive design with accessibility standards and poor quality design outcomes that is often the outcome of a design response driven by regulatory codes.

In reality, inclusive design is much more than regulations and codes. It is about responding to the different needs of the diverse population. Meeting the needs of elderly people and disabled people to enable people to enter and use buildings is a significant aspect of what an inclusive design process attempts to achieve. However, the accepted definition of inclusive design has evolved to embrace the idea that the designer needs to consider the diversity of the human population. This includes consideration of difference associated with gender, race, religious belief and sexual orientation as well as age and ability.

"An inclusive environment is one that can be used by everyone regardless of age, gender or disability. It recognises and accommodates differences in the way people use the built environment and provides solutions that enable all of us to participate in mainstream activity equally"

Accessible City

National planning advice is contained in a series of planning policy guidance notes. PPG1: 'General Policies and Principles' (February 1997) acknowledges the opportunity development proposals present for securing a more accessible environment for all. Paragraphs 33 and 34 stated:

'Local planning authorities, both in development plans and in determining planning applications, should take into account access issues. These will include access to and into buildings, and the need for accessible housing. The internal layout of buildings is not normally material to the consideration of planning permission. Part

M of Schedule 1 of the Building Regulations 1991 imposes requirements on how non-domestic buildings should be designed and constructed to secure specific objectives for people with disabilities. It would be inappropriate to use planning legislation to impose separate requirements in these areas.'

'... the developer and local planning authority should consider the needs of people with disabilities at an early stage in the design process. They should be flexible and imaginative in seeking solutions, taking account of the particular circumstances of each case. Resolving problems by negotiation will always be preferable, but where appropriate the planning authority may impose conditions requiring access provision for people with disabilities.'

There is a lot of scope just in these examples to build an accessible city.

Topic Papers

There are twelve Topic Papers. Presented below are the immediate issues that will need to be considered:

- Vision and Aims and the Development Strategy: there is so much in the vision and aims that will advance equality of opportunity. However, a sustainable and thriving community is one, which has good design, is accessible, and fosters good community relations.
- The Duty to Cooperate: this issue is only beneficial to equality
- Growth in Housing: The evidence base for the number of specialist houses is questionable. For example, is it seriously saying that there will only be a need for 12 houses for those with physical disabilities before 2031 and 12 houses for people with a mental impairment? The Gypsy and Traveller community had a citizen's jury, which will feed into this topic.
- Employment and Economic Development: At the centre of producing equality for people is providing sustainable economic growth for all. MK has more jobs than working-age people living within its boundaries.
- Town Centres and Retail; this issue is only beneficial to equality
- Transport and Travel: Accessible transport is a key to equality in Milton Keynes. In the past people with disabilities and older people have been the last people to be considered. Can an accessible transport system for all be a central aim of the transport strategy?
- Rural Issues; this issue is only beneficial to equality
- Provision of Physical and Social Infrastructure; this section includes so many aspects that promote equality it is important we more closely outline the benefits. Further consideration of faith communities, building on past work is required.
- Quality of Place; Quality of Place is about more than just the design and quality of buildings; it is also about the spaces between them and our enjoyment of the environment. The design of a place is integral to the way it

works; the way people use an area or travel around it; the way that people feel about it, and whether they enjoy spending time there; how easy it is to understand or interpret the space, what it is used for and how to move through it. Again, there is very little about how the diversity of people in terms of age, disability, or community relations is influencing design. How barriers are placed in the environment. Can we adopt inclusiveness by design principals?

- Culture and Recreation; this issue is only beneficial to equality
- Open Space and the Natural Environment; this issue is only beneficial to equality
- Climate Change and Sustainability; this issue is only beneficial to equality

4. Recommendation

This assessment has reviewed the issues that arise from the topic papers and suggests that the traditional approach to equality in previous Plans and/or Frameworks could be described as a passive.

Whilst many areas of the Plan: MK are not relevant to equality, there are key areas where there is a need to question the evidence base and have due regard to how people are affected. The assessment has raised key questions in the areas of disability, religious organisations, and the creation of diversity of housing to meet preferences of a diverse community – this includes issues of overcrowding and the needs of gypsy and travellers. After the consultation periods, a further EqIA will support a more active consideration of these issues.