

Equality Impact Assessment of City Centre Area Action Plan (Issues and Preferred Options) – November 2008

The purpose of this report is to set out the vision, objectives and suggested 'ingredients' in the City Centre Area Action Plan Issues and Preferred Options document and to assess these for the likely impact they will have on the six equality groups. Data collected from public consultations is used to inform this analysis and to identify the planning issues of most importance to equality groups. This Equality Impact Assessment concludes that the City Centre Area Action Plan should have positive impacts on all of the equalities groups. A number of actions are proposed to ensure that issues of concern are more fully recognised and addressed in the draft City Centre Area Action Plan.

1. Background

1.1. Context

This document represents the second stage in preparing Plymouth City Council's City Centre Area Action Plan. It has been produced for public consultation, and builds on an earlier Issues and Options document (published March 2005). This new consultation document finalises the list of key issues which the Area Action Plan must address and also sets out the 'key ingredients' which the Council believes should go into the development of the strategy for the City Centre. It provides an opportunity for the public and other stakeholders to comment on these key issues and ingredients. The Equality Impact Assessment is being conducted at this stage of the process so that it can consider the issues and ideas and comments made on them and make recommendations for the development of the draft Area Action Plan.

The next stage of producing the Area Action Plan will be to produce the draft Area Action Plan which will be made available for further public consultation. It will then be formally submitted to the Secretary of State. Once adopted, the Area Action Plan will form part of a portfolio of documents called the Local Development Framework (LDF). The central document in the LDF is the Core Strategy (adopted April 2007) which provides a strategic planning framework for the city, guiding development to 2021 and beyond. The Core Strategy sets out Plymouth's spatial vision – to turn Plymouth into 'one of Europe's finest, most vibrant waterfront cities where an outstanding quality of life is enjoyed by everyone'. Area Action Plans provide more specific detail on development opportunities within key areas of the city. This City Centre Area Action Plan will not repeat the policies contained within the Core Strategy but the two plans should be read together to aid decision-making.

The LDF Core Strategy has been prepared in line with national planning policy and is in general conformity with regional planning guidance (RPG10 and the emerging Regional Spatial Strategy) and the Devon Structure Plan 2001 – 2016. The Core Strategy adopts the overall vision and aims of the City Strategy and of the Corporate Plan, and will support their implementation.

1.2. Aims and objectives

This document uses as its starting point the vision and objectives for the City Centre as set out in the Core Strategy:

To reinforce the City Centre's role as a vibrant and thriving regional destination, providing high quality shopping, recreation, culture, civic, education and commercial facilities, well connected to surrounding neighbourhoods, as well as being a safe place of quality in which to live.

The following objectives have been set out in the Core Strategy:

1. To diversify the current functions of the City Centre to give it more life outside shopping hours, including intensification of residential, office and cultural uses, including, where appropriate, the introduction of tall buildings.
2. To significantly intensify the central area to include taller buildings at key locations, and offer visitors and residents a 24-hour life.
3. To identify a central office core within the City Centre in conjunction with the redevelopment of Millbay.
4. To provide some quieter areas with enough activity at all times to make it feel safe.
5. to attract specialised shops, pubs, entertainment and culture.
6. To ensure connections with adjacent areas are strong, direct and meaningful.
7. To positively integrate and reinforce the role of the University and the Cultural Quarter as vibrant and strong parts of the City Centre.
8. To create a more urban environment in the University area through developments which give a better sense of enclosure to the streets.
9. To enrich the quality of the environment in the City Centre, so that the public areas are clean, safe, accessible and attractive.
10. To see opportunities to create better pedestrian permeability north-south through the City Centre blocks and ensure that new developments seek to improve the legibility of the City Centre.
11. To consider the heritage value of the City Centre and University areas as part of its regeneration.
12. To selectively introduce traffic back into parts of the City Centre.

2. Data relating to equalities groups

Four different public consultations have been examined to identify the views of the groups subject to this assessment and to consider the likely impacts of this policy document on them:

Issues and Preferred Options Consultation

This consultation ran from November 3rd to December 15th 2008. It was carried out in conformity with the Statement of Community Involvement. It included special initiatives to encourage hard to reach groups to participate in the consultation, including a 'mind map' of issues which was displayed in a vacant

shop window in the City Centre and a consultation event at Plymouth Shopmobility to attract older and disabled people. Special workshops were also held with the Disability Action Network and the Youth Parliament. An online bulletin board was offered as an alternative for people who wanted to comment but not to make formal representations. Altogether, 237 formal representations were received and 173 bulletin board comments.

Issues and options consultation

Consultation on the Core Strategy Issues and Options document included a consultation with hard to reach groups in addition to the general public consultation. This was carried out in August/September 2005. Presentations and workshops were held for:

- members of Black and ethnic minorities (contacted through FATA HE) – 4 attended
- disabled (contacted through the Guild of Voluntary Services) – 6 attended
- young people (contacted through the Plymouth Youth Parliament) – 4 attended
- elderly (contacted through old people's organisations) – 9 attended.

Plymouth Pride were contacted but declined the offer of a workshop. They requested copies of the document instead.

The hard to reach consultation for the Issues and Preferred Options was written up as a report.

Gender Audit

A Gender Audit of the Local Plan Review was carried out in 2001. The aim was to 'gender proof' the plan in order to ensure that all strategies, policies and proposals openly and actively take into account their effects on the respective situations of women and men, and where necessary use specific policies to promote equality. Preparation of the audit involved focus group discussions with women and men and consultations with planning staff. The findings and conclusions of this audit are still relevant to Local Development Framework documents.

Community Planning Studies

Community Planning Studies were undertaken in 1998 as part of the Local Plan review consultation programme to inform the development of a new planning strategy and policies. These studies involved holding stalls at fetes and fun days; a schools consultation exercise and community planning workshops. They covered the whole city to include over 6,500 residents. Hard to reach groups were contacted as follows:

- Race – contacted through the annual RESPECT Festival and by letter.
- Travellers – group contacted by letter.

- Faith groups – places of worship informed of events; Muslim and Jewish groups contacted by letter.
- Age – old people through the Senior Citizens Forum (presentation and workshop). Young people (at primary and secondary level) through the schools consultation exercise.
- Disability – workshop together with the Plymouth Guild of Voluntary Service.
- Gender – women’s groups contacted by letter.
- Sexual orientation – groups were contacted by letter.

The data collected from this exercise were written up as 21 Community Planning Studies (published in 2000), one for each ward in the city including Sutton Ward, and one general study covering city-wide issues. The issues raised were used to inform the development of the First Deposit Local Plan (published December 2001), but in some cases are still relevant to Local Development Framework documents.

2.1. Gaps/inadequacies in the data

No special consultation was carried out with faith or sexual orientation groups, and many of the hard to reach workshops were poorly attended, suggesting that consultation is still not fully engaging hard to reach groups.

2.2. Issues raised by the consultations

The following general issues of concern to equalities groups throughout the city have been identified from the ‘hard to reach’ consultation in 2005, the Gender Audit (2001) and the Community Planning Studies (2000). These issues are of relevance to the development of the Local Development Framework:

- Lack of affordable and special needs housing.
- Difficulty in travelling to work and accessing services.
- Too many streets and buildings are inaccessible to mobility-impaired people.
- Need for socially inclusive neighbourhoods with a range of facilities and amenities.
- Safety concerns - fear of crime but also road safety and personal safety.
- Need for a wide range of opportunities to learn and to work.

The Sutton Community Planning Study, which included the City Centre, identified many of these issues as being of particular concern for equalities groups in the City Centre:

- Safety concerns and the need for more police presence
- Safety concerns over pedestrian subways and road barriers
- The need for more housing in the City Centre
- A lack of services to attract families to live in the City Centre

- The problem of too many ‘buy to let’ properties
- The poor quality of children’s play equipment
- The need for more facilities for children of all ages

The City Centre Area Action Plan Issues and Preferred Options consultation of 2008 identified the following issues:

- The City Centre is not accessible enough for disabled and older persons. There need to be better toilet facilities, lifts and better access to shops.
- There is a lack of facilities and amenities for carers with young children. There is a need for a family-friendly café and also a covered children’s play area.
- There need to be better facilities for young people – a skate park or BMX track.
- Proposals to create new ‘shared space’ should not endanger the safety of pedestrians – especially of visually or mobility impaired people and children.
- There is a need to provide local community facilities to serve the local resident population – especially if families are to live in the City Centre.
- There needs to be affordable housing within the residential mix.

The ‘hard to reach’ workshop also identified the need for attractions for families in the City Centre such as a community meeting space where cultural activities can take place.

3. Key findings

The objectives for the City Centre set out in the Core Strategy have been mapped against the issues of most concern to equalities groups, and the results are shown in Table 1. This analysis shows that the objectives do recognise these issues and they will be developed further as the Area Action Plan progresses.

Table 1 – Objectives against equality issues

| Objective | Housing needs | Travel/ access | Accessibility | Inclusivity | Safety | Economy |
|-----------|---------------|----------------|---------------|-------------|--------|---------|
| 1 | ✓ | | | | | ✓ |
| 2 | | | | | | ✓ |
| 3 | | | | | | ✓ |
| 4 | | | | | ✓ | |
| 5 | | | | ✓ | | ✓ |
| 6 | | ✓ | | | | |
| 7 | | | | | | ✓ |

| Objective | Housing needs | Travel/ access | Accessibility | Inclusivity | Safety | Economy |
|-----------|---------------|----------------|---------------|-------------|--------|---------|
| 8 | | | | | | ✓ |
| 9 | | | ✓ | | ✓ | |
| 10 | | ✓ | | | | |
| 11 | | | | | | |
| 12 | | ✓ | | | | |

3.1. Assessment of impacts by issue

3.1.1 Housing needs

Objective 1 recognises the need to include more residential development in the City Centre. Housing needs are referred to paragraphs 4.10 and 6.1 of the Issues and Preferred Options document. Paragraph 4.10 states that the Area Action Plan needs to increase the amount of housing in the City Centre to assist in creating sustainable City Centre communities. Paragraph 6.1 asks whether the affordable housing requirement should be relaxed for developments in the City Centre. Paragraph 3.29 refers to the need to improve the quality of existing residential areas in the City Centre.

Comment

An increase in housing should have a beneficial impact on equality groups by providing more opportunities to live centrally in sustainable communities. The Area Action Plan should ensure that affordable and lifetime housing requirements are recognised and the need for family housing in the City Centre is considered.

3.1.2 Travel/ access

Objectives 6, 10 and 12 recognise the need to improve connections with adjacent areas, to improve pedestrian access within the City Centre and to selectively introduce traffic back into parts of the City Centre. Paragraph 2.16 of the Issues and Preferred Options document refers to the need for the City Centre to cater to local people's transport needs as well as to visitors' needs. Paragraph 3.21 refers to the need to 'green' the ring road, while paragraph 3.28 talks about the poor links to neighbouring areas because of the ring road.

Paragraph 3.23 refers to the need to improve pedestrian and cycling provision and public transport, as well as improving the bus station, rail station and the car parks. There is a proposal to move the bus station to a new location. The document also recognises that the current rail station is not accessible to all users and needs to be improved. Paragraph 5.11 mentions the possibility of creating more 'shared space' on the City Centre's streets.

Comment

The Area Action Plan needs to ensure that the transport measures are beneficial for people visiting and living in the City Centre. At the moment the ring road is a barrier to pedestrians and cyclists so the measures put forward to break down this barrier should be beneficial to equality groups.

There are positive opportunities to improve access for non-car users and provide better quality parking for car-users. However, if housing in the City Centre is to be expanded then some residential parking will be needed so the Area Action Plan will need to address this.

Concern has been expressed about the safety of 'shared streets' for visually impaired people and children so the Area Action Plan will need to demonstrate the benefits of shared space to both pedestrians and vehicles.

The Area Action Plan needs to ensure that the new bus station is located and designed to improve travel and access opportunities for people who have mobility or visual impairments so that they are not disadvantaged. Finally, it should include a proposal to improve the rail station as this will have a positive effect on all equality groups, especially if it is better connected to the new bus station.

3.1.3 Access for mobility-impaired persons or for people with a disability

Objective 9 refers to making public areas accessible and safe. Improving accessibility is referred to in relation to transport proposals (paragraph 3.23 of the Issues and Preferred Options document). Paragraph 3.25 refers to the poor quality of much of the public realm but does not refer to access for all.

Comment

Accessibility was an issue that was commented on in the recent consultation as a constraint to people with a disability at present. The Area Action Plan should ensure that the need for better access to buildings and public spaces for disabled persons, older persons and carers with young children to make the City Centre an inclusive centre is recognised. It needs to stress that improvements in accessibility will take into account all people's needs and not just those who are most physically mobile.

3.1.4 Inclusive communities

Objective 5 refers to the need for specialised shops and culture. Paragraph 2.16 of the Issues and Preferred Options document refers to the need to provide facilities for the local community as well as for all of Plymouth's communities. Paragraph 3.24 refers to the 'cultural quarter' linked to the University and College of Art and Design. Paragraph 6.1 also refers to the need to provide community facilities and cultural facilities.

Comment

The Area Action Plan should ensure that these suggestions are included as proposals as they should have a positive effect on all of the equality groups by bringing a variety of cultural activities into the City Centre and a greater variety of

community facilities. Specialist shops could cater to some of the equality groups' needs that are not currently served. The Area Action Plan needs to recognise the need for better play facilities for children.

3.1.5 Safety

Safety from crime and road safety is referred to in Objectives 4 and 9. Paragraph 3.23 of the Issues and Preferred Options document refers to the need to ensure the safety of pedestrians and cyclists. Paragraph 3.14 recognises that the area feels unsafe after business hours.

Comment

As mentioned in section 3.1.2, the Area Action Plan needs to clearly state the advantages of shared space for all users to allay fears over pedestrian safety. The Area Action Plan also needs to ensure that measures to improve personal safety and to reduce fear of crime such as better natural surveillance, active frontages, etc. are set out.

3.1.6 Economy and jobs

Many of the objectives will help to diversify the economy and create new jobs. Paragraph 3.11 of the Issues and Preferred Options document refers to the West End vision which is for a 'Covent Garden of the West'. The links with educational institutions (the University and College) will also be strengthened.

Comment

The Area Action Plan should progress these suggestions so that it has a positive effect on education and jobs for equality groups. It is important that a variety of employment opportunities are created.

3.2. Assessment of impacts by equality group

3.2.1 Race

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on race groups. It will promote a better quality of life for everyone – including better social inclusion, accessibility, jobs, safety and decent homes. In particular, it should improve the quality and mix of housing, reduce the need to travel by car and improve the range and quality of local and city-wide shops, facilities, services and amenities. It is considered that the Area Action Plan will have no adverse impacts on promoting good race relations or eliminating unlawful discrimination.

3.2.2 Faith and belief

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on faith/belief groups. There are opportunities to increase the city's cultural facilities and range of specialist shops.

3.2.3 Disability

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on the quality of life of people with a disability. It will promote better social inclusion, transport, accessibility and decent homes. It will improve the design of streets, buildings and public spaces. New employment opportunities will also be provided. However, the Area Action Plan needs to ensure that proposed improvements to transport, buildings and the public realm will be inclusive in design so that no one is disadvantaged through any mobility or sight impairment. The Area Action Plan will also need to specify a requirement for Lifetime Homes in new residential development.

3.2.4 Gender

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have positive impacts on the quality of life of both men and women. In particular, more homes will be provided; access to and through the area will be improved; more jobs will be created and the range of shops and attractions will be increased. However, the Area Action Plan needs to consider the need for affordable housing and the provision of family homes. It will also need to recognise the needs of carers with young children or elderly relatives in terms of access to transport, public realm and buildings.

3.2.5 Sexual orientation

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on the sexual orientation groups by increasing the range of specialist shops, entertainment and cultural facilities.

3.2.6 Age

Young people

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on young people's quality of life by increasing the range of housing, education, shops and cultural/ entertainment facilities. Better provision for pedestrians and cyclists should also benefit young people. However, the Area Action Plan should recognise the need for provision for housing and services for families living in the City Centre – particularly an improvement in play/recreation facilities for children and teenagers.

Older People

By developing the suggestions set out in this Issues and Preferred Options document the City Centre Area Action Plan should have a positive impact on older people's quality of life. In particular, travel to and through the area will be improved, public transport will be improved and new community facilities and shops will be provided. However, the Area Action Plan needs to include a

requirement for Lifetime Homes as part of the residential mix and access to public spaces, transport and buildings should take into account the needs of older people who are less mobile or visually impaired.

4. Recommendations

This Equality Impact Assessment has identified that the suggestions set out in this Area Action Plan Issues and Preferred Options document for the City Centre should have positive impacts on the quality of life of race groups, faith groups, people with a disability, men and women, young people and older people and sexual orientation groups as they developed in the draft Area Action Plan . This Equality Impact Assessment has identified some issues where further work could be undertaken to ensure that the draft Area Action Plan will have a positive impact on all of the issues identified as being of concern to equality groups. In particular the Area Action Plan needs to ensure that it addresses the following issues -

- the proposals for transport and public realm improvements need to demonstrate that they will be inclusive and fully accessible to all users.
- The proposals for increasing the amount of shared space need to demonstrate the benefits to all users.
- The proposals for new housing need to consider the need for affordable and Lifetime Homes as well as family housing.
- The proposals for new development need to emphasise the importance of increasing natural surveillance and public safety.
- The provision of new community facilities should be inclusive of all needs.

5. Action Plan

In order to ensure that the points identified above are fully taken into account in the draft City Centre Area Action Plan the following actions are proposed -

1. To include a report to accompany the draft Area Action Plan stating whether the recommendations made in this Equality Impact Assessment have been incorporated.
2. To carry out consultation on more detailed policies or proposals relating to public realm or shared space as required with disabled groups, older people and carers with young children.
3. To report in the consultation summary of the draft City Centre Area Action Plan on the % of respondents by gender, age and ethnicity.