Purbeck Local Plan

Submission January 2019

Equalities Impact Assessment and Health Impact Assessment





Thriving communities in balance with the natural environment

Contents

Introduction	3
Part One: What is the purpose of an Equality Impact Assessment and a Health Impact	
Assessment?	4
Part Two: Baseline information	6
Part Three: The EqIA Assessment	11
Part Four: The HIA assessment	
Part Five: Comments on the HIA and EqIA	37

Introduction

- 1. As a public sector organisation, Purbeck District Council has a duty under the Equality Act 20102 and associated Public Sector Equality Duty (PSED) to ensure that the objectives and policy options within the Purbeck District Local Plan eliminate unlawful discrimination (direct and indirect), as well as advancing equality of opportunity and fostering good relations between those with a protected characteristics and all others. An Equality Impact Assessment (EqIA) is often used by public sector organisations to demonstrate how this duty has been met.
- 2. This report seeks to identify and make suggestions to diminish possible negative impacts on equalities and health that may result from the Purbeck Pre-submission Draft Local Plan.

Which officers are involved in the EqIA?	Frances Summers, Planning Policy Officer
Date of assessment	September 2018

- It is presented in six parts:
 - Part 1 sets out the purpose of the document
 - Part 2 presents baseline information about the District.
 - Part 3 assesses the proposed policies, site allocations and consultation procedures against equalities issues.
 - Part 4 summarises the Local Plan contents against the nine protected characteristics
 - Part 5 assesses the proposed policies against health impact criteria
 - Part 6 summarises any potential conflicts identified in the assessments, and includes recommendations for improvements.
 - Part 7 discusses the strengths of the consultation and communication strategy and potential policies.

Part One: What is the purpose of an Equality Impact Assessment and a Health Impact Assessment?

Why do we need to do Assessments?

- 4. The Council is seeking representations to inform the preparation of the Purbeck Local Plan. The Purbeck Local Plan 2018 -2034 Pre Submission Draft is being published in autumn 2018. The Council will invite comments on the Plan over a period of six weeks and any representations received during this period will be submitted with the final submission version of the Local Plan, along with supporting documents, to the Planning Inspectorate for examination by an independent Inspector appointed by the Secretary of State for the Ministry of Housing Communities and Local Government.
- 5. The examination process is subject to the Planning Inspectorate's timeframes and resources. However, it is expected that the examination including oral hearings will take place in summer 2019 and that this stage would be completed in early autumn and the Purbeck Local Plan adopted by the end of 2019.

Equality Impact Assessment

- 6. Purbeck District Council is required to undertake an Equality Impact Assessment (EqIA) of its policies, plans and strategies to ensure that they do not discriminate against any group or individual in the community. The duty to undertake EqIA arises from the Race Relations (Amendment) Act 2000.
- 7. EqlAs are required by law to include a range of equalities issues. To incorporate EqlAs into the plan-making process we also need to take into account some of the wider issues of social inequality, in particular rural isolation and related deprivation such as fuel poverty.
- 8. Therefore, the following equality areas are used in a matrix to determine whether the Purbeck Local Plan Pre Submission draft has potential implications in relation to: Age, Disability, Ethnicity, Faith or Belief, Sex, Gender Reassignment, Sexual Orientation, Social Inequalities, Rural Isolation, Marriage, Civil Partnerships, Pregnancy and Maternity, and Full Representation of the Public. The matrix in part three identifies where the policies are compatible and where they have potential or likely conflict with the equality areas.

Heath Impact Assessment

- 9. According to government guidance¹, there are a range of issues that could be considered through the plan-making and decision-making processes, in respect of health and healthcare infrastructure. These include how development proposals can promote and support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do in high quality open spaces, whilst creating places and spaces to meet to support community engagement and social capital, supporting the reduction of health inequalities and providing access to healthier foods.
- 10. The Council has undertaken a Health Impact Assessment (HIA) to identify how the main principles of health and healthcare will be addressed through the Local Plan.

What is the purpose of this document?

- 11. This document provides an EqIA and/or HIA on the following aspects:
 - 1. The communications strategy for making representations on the Local Plan Pre Submission draft consultation planned for autumn-winter 2018;

¹ http://planningguidance.planningportal.gov.uk/blog/guidance/health-and-wellbeing/what-is-the-role-of-health-and-wellbeing-in-planning/

2. The policies within the Local Plan, including housing site allocations.

The Communications Strategy

- 12. The Council has prepared a Communications Strategy for the autumn 2018 Local Plan Pre-submission draft representations period. The Communications Strategy is subject to an EgIA which is presented later in this report.
- 13. The Communications Strategy outlines the key messages for the representations period, explaining how people can get involved, and details of how the opportunity to comment will be publicised. It must be remembered that, in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Regulations), the Pre-submission draft Local Plan is a formal process. All comments received must be received within the prescribed statutory period and will be sent directly to the Planning Inspectorate.
- 14. The key elements of the Communications Strategy, undertaken in accordance with the 2012 Regulations, can be summarised as follows:
 - **Council magazine:** Full page article in "About Purbeck" the Council magazine.
 - **Social media**: consultation related posts and updates will be provided on Facebook and Twitter to promote responses.
 - Newspaper publicising: press releases sent to media and hosted on Dorsetforyou, and paid for print adverts in the Swanage and Wareham Advertiser, statutory adverts placed in Bournemouth Echo and Dorset Echo.
 - Libraries and Council offices: Promotional information and printed copies
 of the Local Plan Pre-submission Draft will be available to view at Libraries
 across the District during open hours.
 - **Website:** Interactive consultation document supporting online responses, information and all evidence documents available online.

The Local Plan Pre-submission Document

- 15. The Purbeck Local Plan sets out the Council's planning framework and identifies how the District will grow and develop to become an even more desirable and prosperous place to live, work and visit. The Purbeck Local Plan sets out a strategy for the whole District for the period up to 2034 and comprises of a Written Statement, sustainability appraisal and a Policies Map.
- 16. The preferred strategy is to enable new development at appropriate locations across the District over the plan period, directing the majority of housing growth to less constrained areas, in particular Wool and Moreton Station / Redbridge Pit in the west of the District as well as to the existing towns and villages. As well as being the least environmentally constrained, these areas offer a range of investment opportunities with substantial capacity to accommodate new homes. They are accessible for employment growth and will facilitate investment in additional infrastructure that might be required including schools and health facilities.
- 17. The Local Plan Pre-submission document contains a number of detailed planning policies that will help deliver the strategy and manage development across the District over the lifetime of this Plan.

Part Two: Baseline information

What are the corporate priorities and how have the consultation and the Local Plan been designed to meet them?

- 18. The consultation and policies are designed to meet all the Purbeck District Council corporate priorities and targets;
 - Enhancing local communities and involvement,
 - · Being an efficient and effective council,
 - Protecting and enhancing the natural environment,
 - · Meeting the housing needs of local people,
 - Improving the local economy and infrastructure.
- 19. The purpose of the opportunity afforded to comment on the Purbeck Local Plan Pre-submission draft is different to previous rounds of consultation on the Local Plan. Representations made during this statutory six week period should focus on the 'soundness' of the final plan; all responses received are then sent to the Planning Inspector rather than considered by the Council. However, the period allowed for making representations will still ensure that residents, businesses and other interested parties have the opportunity to understand both the local plan process and comment on the contents of the draft plan, robustness of the supporting evidence and the manner in which it has been prepared. Therefore, this will help to meet the corporate priority of 'enhancing local communities and involvement'.
- 20. The purpose of the Local Plan is to ensure the District can fully address the housing needs, protect and enhance the natural environment and improve the local economy and infrastructure. This will help to meet other corporate priorities.

Who will the Purbeck Local Plan policies have an impact on, e.g. public, visitors, staff, members, and partners?

- 21. Policies in the Purbeck Local Plan will impact on the following groups:
 - residents:
 - service users;
 - people wishing to move to Purbeck;
 - potential second home buyers;
 - business owners; and,
 - developers.

Are there any potential barriers to implementing changes to your strategy or policies, e.g. capacity or financial issues?

22. The Local Plan will represent a long term strategy for managing growth to meet the needs for development in Purbeck. The proposed strategy is subject to the statutory period for representations and independent examination that may lead to further changes to the identified proposed draft prior to its adoption. Once adopted there are no anticipated issues in ensuring the policies and proposals of the Local Plan are drawn upon. However, implementation of the growth proposals within the Local Plan will largely be led by private developers. The specific delivery of proposals within the Purbeck Local Plan will consequently be subject to the financial viability of development and the submission of proposals for development that are acceptable to the Council in accordance with the policies contained in the plan. The Purbeck Local Plan includes a monitoring and implementation strategy that will review progress made in the implementation of the Local Plan and enable action to be taken where issues arise.

Who will be involved in implementing the statutory representations period for the Local Plan?

- 23. The Purbeck Local Plan and supporting documentation is being prepared by the Council's Planning Policy Team, working with the Communications Team. The Communications Team provide advice on communication style and format that helped to design the materials which are written in plain English, jargon free and supplemented with appropriate images.
- 24. Once adopted, the policies in the Purbeck Local Plan will be implemented by the Council's planning committee and development management team when determining planning applications.

What data do you already have, broken down by equality strands, about your service users or the people your policies or consultation will have an impact on?

Current available data

- 25. The Purbeck Local Plan is a long term framework for growth and decision making regarding development in the District. As a consequence it is relevant to all residents, workers and visitors to Purbeck.
- 26. Statistics have been gathered to create a baseline of information from which to determine whether the communications strategy and policy options may affect the residents within Purbeck.
- 27. Please note that all statistics were found at Dorset Statistics, https://apps.geowessex.com/stats/, unless stated otherwise. They were correct as of 1 August 2018.

Population

28. The population of Purbeck is 46,760 compared to the Dorset-wide population of 424,670 (both figures taken from 2017 Mid-year estimates).

Age profiles

- 29. 27% of the population are aged 65 and over, which is lower than the Dorset average of 28.3% but considerably higher than the UK average of 18.0%.
- 30. 16% of the population are 15 years and under.
- 31. 56.9% of the population is of working age.

Ethnic groups

32. 96.2% of the population is White British with 3.8% from Black and Minority Ethnic groups and 0.8% whose main language is not English. This is markedly different to the national equivalent of 80.5% White British, 19.5% Black and Minority Ethnic groups and 7.7% whose main language is not English.

Socio-economic classifications

- 33. 185 people claim job seekers allowance or universal credit who are out of work. That equates to 0.4% of the Purbeck population which is very low compared to the percentage of people from the whole of the United Kingdom at 2.3%.
- 34. Almost 24% of Purbeck's population is classed as being residents of isolated rural communities.
- 35. 8% of the total households are classified as lone parents.

Access

36. 14.5% of households do not own a car or van compared to 25.6% of households nationally.

Type of housing

- 37. The average house price in Purbeck in October 2017 was £329,547² compared to £226,807 nationally.
- 38. 70.4% of homes are owned. 12.5% of homes are publically rented, 15.3% of homes are privately rented and all others amount to 1.8%.
- 39. Only 0.8% of the total number of properties are classed as being long term empty homes.

Economic activity or inactivity

- 40. Over 80% of the population are economically active. This is higher than the Office of National Statistics' figures which state the national average for England at Wales at 76.8%.
- 41. Those who live in Purbeck earn an average of £506.10 per week. Those who work in Purbeck earn an average of £541.50 per week.

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² http://landregistry.data.gov.uk/app/ukhpi

Responding to feedback from previous consultations

42. The following key issues have been identified through previous consultation on the Local Plan. The Council sought to amend its approach to the last consultation in January 2018 on New Homes for Purbeck, in order to address these issues.

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Key Issue	Issues affected	How we have improved our approach to consultation
In 2016, there was a perception that the publicity of the consultation was lacking.	All	To support the general engagement undertaken the Council in 2018 commissioned a telephone survey to increase the range of residents that have their say. Notification of consultation documents is again published in the Council magazine that is delivered to every household and business in the District. Adverts continue to be placed in the Swanage and Wareham advertiser, as well as the Bournemouth and Dorset Echo. The Council continues to utilise social media in an attempt to reach a wider audience. The Council continues to issue press releases.
In 2016, it was suggested that some people did not receive a consultation leaflet.	All	During the Options Consultation 2016, the Council contracted a company to deliver leaflets to every household in Purbeck. A small proportion of the leaflets did not get delivered before the consultation events took place in that particular area. It is thought that some people may immediately throw away leaflets without first reviewing them and this could have led to the notion that the leaflets were not delivered. To help publicise the representations period in the winter and autumn of 2018 the Council used 'About Purbeck', a regularly distributed Council magazine with a proven track record of delivery. The magazine was delivered by Royal Mail.
In 2016, several respondents claimed the online system was difficult to navigate.	All	For the pre-submission publication comments, the Council is encouraging online responses using the prescribed representations form as supplied by the Planning Inspectorate. Telephone support will be available to residents needing assistance in responding whilst printed forms are available if required.
In 2016, there was a suggestion that the consultation period should be extended.	All	The Options Consultation lasted 9 weeks over the summer. A plan must be consulted on for a minimum of 6 weeks; this is a legal obligation and one the Council achieves. The most common reason for wanting to extend the consultation was because the 2016 options consultation took place over the summer when many people were on holiday. This suggests that this issue was, in part, related not to the consultation period but the consultation timing. Wherever possible the Council aims to organise consultation to avoid holiday periods. Where consultation periods are unable to avoid holiday

Key Issue	Issues affected	How we have improved our approach to consultation
		periods the Council will consider extending the consultation period. As demonstrated during the previous consultation, the Council always remains flexible to allow for unexpected changes in circumstances. All closing dates for consultation are clearly publicised through a range of methods during periods of public engagement. The New Homes for Purbeck consultation was scheduled to run for 6 weeks from January – March 2018. However, due to poor weather some roadshow events were cancelled. The Council then extended the period of consultation to account for this. For the statutory 6 weeks period for commenting on the Pre Submission Draft Local plan is during the autumn, running from 22 nd October to 3 rd December 2018, thereby avoiding holiday periods.

Part Three: The EqIA Policy Assessment

43. Each policy within the Local Plan is subject to assessment in relation to equalities issues. They are assessed below. Those that are likely to have a positive or no effect are assessed as 'Compatible'. Those that are likely to have a negative effect or where the assessment would need further information or research are assessed as being 'potential conflict'.

POLICY		ISS	SUE	S IN	RE	LATI	ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
V1 Spatial strategy for sustainable communities	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The spatial strategy policy states that the council will favour development on allocated sites within the development plan. These sites have been identified as appropriate for development and would be compatible with the equality indicators.
V2 Green belt	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The green belt policy includes release of land around Upton, Lytchett Matravers and Wareham. This will allow development near services in existing settlements and therefore avoid exacerbating rural isolation or social inequalities.
E1 Landscape	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Potential	There is potential conflict for rural isolation as development is restricted due to environmental constraints. Whilst this is unavoidable the policy does allow for some development and cumulatively the whole plan will allow for an element of choice in housing locations.

POLICY		ISS	SUE	SIN	IRE	LATI	ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
E2 Historic Environment	Compatible	Potential conflict	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	There is potential conflict for disability as the protection of the historic environment can reduce accessible options. However the policy states that public benefits arising from development of a heritage asset can be acceptable if they outweigh the harm.
E3 Renewable Energy	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The policy will encourage production of energy from renewable and low carbon sources and bring community benefits to all through supporting community energy schemes.
E4 Assessing Flood Risk	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	All sections of the community will benefit from this policy to avoid and where necessary mitigate flood risk arising from new development.
E5 Sustainable Drainage Systems	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The policy will benefit all by improving drainage around new development to manage surface water and help avoid / reduce flood risk.

POLICY		ISS	SUE	S IN	RE	LATI	ON T	ΓΟ		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
E6 Coastal change management areas	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The policy will benefit all by not permitting any residential development in areas of coastal instability.
E7 Conservation of protected sites	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Potential conflict	There is potential conflict for rural isolation as development is restricted due to environmental constraints. Whilst this is unavoidable the policy does allow for some development and cumulatively the whole plan will allow for an element of choice in housing locations.
E8 Dorset Heathlands	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Potential conflict	There is potential conflict for rural isolation as development is restricted due to environmental constraints. Whilst this is unavoidable the policy does allow for some development and cumulatively the whole plan will allow for an element of choice in housing locations.

POLICY		ISS	SUE	S IN	RE	LATI	ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
E9 Poole Harbour	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The policy will benefit all by not granting planning permission for development which would result in a negative impact on Poole Harbour SPA, SSSI and Ramsar site.
E10 Biodiversity and Geodiversity	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy will benefit all sections of the community.
E11 Development next to sewage treatment works and pumping stations	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy will benefit all sections of the community.
E12 Design	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	All sections of the community will benefit from this policy as it promotes safe and attractive places for the benefit of all.

POLICY		ISS	SUE	S IN	RE	LATI	ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
H1 Local Housing Requirement	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The policy identifies the objectively assessed need for new homes across the plan period. It does not include any detail about location of mix of housing. This policy will benefit all members of the community.
H2 The housing land supply.	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Potential Conflict	The policy identifies the objectively assessed need for new homes in designated locations. Whilst this development is spread across the district it does focus, in the main, on current settlements. This may increase rural isolation. Although, this will in part be mitigated by improving transport links.
H3 New housing development requirements	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy identifies the criteria for specific allocated housing sites. The criteria set out are compatible with all groups identified.
H4 Moreton Station/Redbridge Pit	Compatibl	Compatibl	Compatibl	Compatibl	Compatibl	Compatibl	Compatibl	Compatibl	Compatibl	This policy specifically considers the allocated sites. The development is expected to meet requirements which will be compatible with all sections of the community.

POLICY		ISS	SUE	S IN	RE	LATI	ON T	ГО		NOTES
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H5 Wool	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy specifically considers the allocated sites at Wool. The development on different sites is expected to meet certain requirements. These requirements seek to improve infrastructure to benefit all members of the community.
H6 Lytchett Matravers	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy specifically seeks improved accessibility between Lytchett Matravers and Lytchett Minster and financial contributions for health infrastructure and education. These requirements have been established to ensure all members of the community benefit.
H7 Upton	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy specifically considers the allocated sites at Upton. The development is expected to include mitigation measures and financial contributions for health infrastructure and education. These requirements have been established to ensure all members of the community benefit.
H8 Small sites next to existing settlements	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy will make a positive contribution to the identified housing needs of Purbeck and will assist in developing diverse communities. It will have a positive impact on older people and those with specialist housing needs. Policy focuses housing around existing settlements where there are local services and adequate infrastructure.

POLICY		ISS	SUE	S IN	RE	LATI	ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
H9 Housing Mix	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy will make a positive contribution to the identified housing needs of Purbeck and will assist in developing diverse communities. It will have a positive impact on older people and those with specialist housing needs.
H10 Part M of the Building Regulations	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The policy will have a positive impact on those with a disability or who are elderly by providing for developments that will help provide flexible living space that can allow simple adaptation if necessary.
H11 Affordable Housing	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Promoting affordable housing will contribute towards a mix of housing provision to cater for all groups. Where there is an identified need it can be targeted towards specific groups.
H12 Rural exceptions sites	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The policy will have a positive impact on rural isolation as the council will promote affordable housing in rural locations outside settlement boundaries. This is highly compatible with rural isolation.

POLICY		ISS	SUE	S IN	I RE	LATI	ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
H13 Rural workers homes in the countryside	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy is specifically to consider those working in rural areas. This is highly compatible with rural isolation to meet the needs of rural residents.
H14 Second Homes	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy is specifically to consider principle residence in the AONB. This is compatible with all of the groups identified to positively contribute to home ownership.
H15 Gypsy, traveller and travelling showpeople	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy is specifically to consider those from the travelling community with a criteria based policy to meet their needs.
Policy EE1 Employment land supply	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Potential Conflict	The policy will support a variety of opportunities on employment land providing certain criteria can be met. The policy states that employment sites are particularly in the towns and villages; this could have a conflict with rural isolation. However, employment sites in rural areas may not be viable and the proposed locations are dispersed.

POLICY	ISSUES IN RELATION TO						ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
Policy EE2 Planning for employment	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The policy will benefit all sections of the community by promoting employment opportunities. Specific consideration of promoting rural employment opportunities.
Policy EE3 Vibrant town centres	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy will have a positive impact by supporting proposals for main town centre development, residential and mixed use schemes which would add variety of businesses to town centres and increase activity for the benefit of all.
Policy EE4 Supporting vibrant and attractive tourism	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy will benefit all members of the community by protecting and promoting Purbeck's Tourist economy. Specific consideration of promoting rural tourism.
Policy I1 Developer contributions to deliver Purbeck's infrastructure	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	This policy will benefit all members of the community by supporting the delivery of infrastructure improvements.

POLICY	ISSUES IN RELATION TO						ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
Policy I2 Improving accessibility and transport	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The improvements proposed in the policy will be of benefit to all; improved accessibility will specifically benefit groups who may have reduced mobility.
Policy I3 Green infrastructure, trees and hedgerows	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	All sections of the community will benefit from this policy as it promotes green infrastructure with improvements targeted to areas based on relevant up-to-date evidence. Specific consideration of improving connections through green infrastructure.
Policy I4 Recreation, sport and open space	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	All sections of the community will benefit from this policy as it actively seeks new facilities and safeguarding or replacement of facilities. Policy states that replacement facilities must improve accessibility.
Policy I5 Morden Park strategic suitable alternative natural green space and holiday park	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The improvements proposed in the Policy will be of benefit to all sections of the community.

POLICY		ISS	SUE	S IN	IRE	LATI	ON T	ГО		NOTES
	Age	Disability	Ethnicity	Faith or Belief	Sex	Gender re-	Sexual Orientation	Social Inequalities	Rural Isolation	
Policy I6 Wareham integrated health and social care	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The improvements proposed in the Policy will be of benefit to all sections of the community.
Policy I7 Community facilities and services	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Potential	The policy will benefit all members of the public by supporting existing community facilities and provision of new facilities for new development. There is a potential conflict for rural isolation as new facilities will be encouraged to locate within a defined settlement. Whilst this is difficult to mitigate other policies within the plan seek to improve transport links.
Communications Strategy	Potential conflict	Potential conflict	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	Compatible	The communications strategy outlined earlier in this assessment is focused upon wide ranging communication of the opportunity to comment on the Purbeck Local Plan Pre-submission Draft and focus on an online service for responding. There are no public events planned, removing potential conflicts to consider in relation to physical and temporal barriers – but as a result the engagement process may disadvantage specific age groups and those with disabilities. An article in About Purbeck will ensure all groups would have adequate notification that the Local Plan Pre-submission Draft. Submission of responses and access to further information will equally be available to all online and at libraries and council offices. However, this has some potential for conflict where it is known older age

POLICY		ISS	SUE	SIN	RE	LATIO	NC	ГО		NOTES
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										groups and the disabled are generally less likely to access material and engage online. Overall, this conflict is considered small and is mitigated by the availability of Purbeck District Council officers during office hours to provide advice and guidance to potential respondents.

Part Four: The Equality Impact Assessment

44. The previous chapter looked at each policy individually and assessed the policy against a series of equality criteria. However, the Local Plan should be read as a whole to understand its true impact. Therefore, the following section summarises the Plan's performance against each of the nine protected characteristics plus the addition of "rural inequality" an aspect of socio-economic status of particular importance within Purbeck.

Age

- 45. The Submission Plan will help to support people of all ages within the District through providing a high quality environment to work and reside. It seeks to ensure that the right size and type of new homes is provided across the District to meet the needs of specialist groups, particularly older people. This reflects the evidence as set out in the SHMA and the 2018 update that there is an existing need for accessible housing in the District that will continue taking into account the ageing profile of the District's population over the period of the Local Plan.
- 46. The mix of housing supported through the Plan includes affordable housing, specialist accommodation, and self-build/custom build housing. The provision of specialist housing will support those vulnerable and requiring assistance, responding to the variation in needs shaped by health, income/equity, level of activity, and lifestyle. A requirement of 40% affordable housing is to be delivered on-site on development greenfield sites of 10 or more homes, (30% on brownfield sites) and 20% provision where 2 to 9 homes are provided will encourage young people and families onto the housing ladder.
 - 47. The spatial strategy sets out in policy how the District's population of young people and families' needs will be met, including employment opportunities in sustainable locations. The continued expansion of Dorset Innovation Park as an employment location, and the targeted employment expansion at Holton Heath are expected to be particularly beneficial for young people in these locations, through job creation.
 - 48. Support and funding secured from development towards primary and secondary school will provide additional capacity and facilities, and therefore will positively impact children. In this context, further education provision will also provide opportunities for, but not exclusively, younger people. Improving access to education and training will result in new skills development, reducing rates of unemployment in the area and improving living environments. This could be particularly beneficial for young people, families and older lower skilled people.

Disability

49. The Plan recognises the importance for a proportion of new homes to provide for the needs of those with, or who may develop, accessibility needs. This includes support for housing specifically designed to meet the identified needs of disabled people. The Council's approach is that on sites of 10 homes or more (or sites greater than 0.5ha) 10% of all new homes should be built to Category 2: Accessible and Adaptable Homes standards, in order to maximise choice in the type, size and location of new homes available. This

- should ensure that there is provision to meet the specific needs of disabled people.
- 50. Infrastructure delivery in the Plan area seeks to meet the aspirations set out within the spatial strategy. Promotion of additional community facilities including recreation and health facilities is likely to encourage the integration of disabled people into the community, contributing positively towards overall quality of life and community cohesion. The provision of GP surgeries in local areas will further help to reduce local health inequalities, contributing towards the improvement of levels of disability in the District. Wareham town centre in particular includes the provision of a 'health hub', which will comprise of an integrated GP surgery, pharmacy and any other necessary health services identified within the Infrastructure Delivery Plan.
- 51. As discussed under 'Age', improvements to the sustainable transport network through the regeneration of existing centres would improve accessibility for residents. This is of particular importance to disabled people where their disability can inhibit mobility. Improvements to/the provision of new bus services, train services, and footpath improvements (i.e. widening) would improve disabled peoples access both day-to-day local services and facilities, and to neighbouring settlements.
- 52. The Plan includes objectives to facilitate working from home, which would widen employment opportunities for disabled residents, reducing inequality in the workplace.

Sex

53. No significant effects have been identified for this protected characteristic.

Marriage and civil partnership (in employment only)

54. No significant effects have been identified for this protected characteristic.

Pregnancy and Maternity

- The Plan includes objectives to facilitate working from home, which would likely provide additional employment flexibility during pregnancy and maternity. This will be supported by improvements to high speed broadband and telecommunications infrastructure.
- 56. The provision of new and/or improvements to health facilities in the District is likely to have a positive impact on women during pregnancy and maternity by ensuring facilities are easily accessible and have capacity, considering the likely increased use of the facilities for this group. In addition to health facilities, the Plan seeks to develop communities with good access to public transport; and with safe and pleasant routes for cyclists and pedestrians. This will have a positive impact on pregnant women or women with small children, improving access to outdoor recreation and the uptake of healthier modes of travel. This is also expected to positively affect quality of life and neighbourhood satisfaction for this group.

Race

57. The Plan encourages the development of flexible local employment space to meet the employment and economic needs of the District. This may include local ethnic owned businesses, having a positive effect on the economic prosperity of these groups.

Religion or belief

- 58. Infrastructure delivery in the Plan area seeks to meet the aspirations set out within the spatial strategy. The provision of, and improvements to, community facilities may positively affect religious groups depending on the type of facility and intended use. Positive effects are expected where community facilities include places for worship and religious activities. This may include cultural facilities and community meeting spaces. However it is noted that the change of use of community facilities could result in negative impacts; and as such it is recommended that specific EqIAs should be undertaken for Planning applications where necessary.
- 59. The protection and enhancement of designated and non-designated heritage assets may have a positive impact for religious groups who have connections to these assets, for example places of worship. The Plan policies seek to sustain and enhance the significance of heritage assets for long-term enjoyment and conservation.

Sexual orientation

60. No significant effects have been identified for this protected characteristic.

Socio-economic status (lower economic status, deprived areas and rural inequality)

61. The Plan will help to support less affluent areas, improving levels of equality through provision of high quality new residential development in sustainable locations. Residential development to be delivered will include a mix of affordable housing units in terms of affordable rent and intermediate housing, to accord with the latest available evidence set out in the SHMA. This will support local housing need, positively addressing levels of deprivation across the District. The Plan supports interconnected communities, identifying socioeconomic objectives at the local and strategic level through the spatial strategy. This will maximise infrastructure delivery and employment opportunities in areas of lower economic status. The provision of retail facilities within local villages and smaller settlements will provide positive impacts for those from lower socio-economic groups that may not have a car, facilitating access to day-to-day services and amenities.

Conclusion

- 62. The Plan seeks to promote accessibility and connectivity to housing, employment, education and leisure facilities throughout the District. Specialist groups are supported through policy requirements, ensuring that an appropriate mix of housing and accommodation types is provided to meet the needs of all residents. This includes support for proposals for housing specifically designed to meet the identified needs of older people, specialist accommodation and self-build/custom build housing.
- 63. The Plan demonstrates the Council's ongoing commitment to equality, promoting cohesive communities in the District through area specific policy. Chapters 5 and 6 of the Plan and the spatial strategy highlight the support for diverse interconnected communities, identifying socio-economic objectives at the strategic and local level. This will maximise infrastructure delivery and employment opportunities in areas of lower economic status, contributing

- towards addressing pockets of deprivation. Taking this into consideration, it is appropriate to conclude that the Submission Plan would have significant positive long term effects.
- The aspirations set out within the Purbeck Local Plan's vision, objectives and Policy V1 (Spatial strategy for sustainable communities) will also contribute towards reducing health inequalities in the District.

Part Five: The Health impact assessment

- A health impact assessment (HIA) helps ensure that health and wellbeing are properly considered in planning policies and proposals. This HIA considers the health impacts of the Purbeck Local Plan in terms of how this statutory planning document can influence public health through successful plan-making, accounting for housing, open spaces and sustainable transport. The Local Plan has been produced in consultation with public health bodies and providers, to ensure that planning and health are integrated into the local planning policies which will shape development across the Purbeck District over the new plan period (2018-2034).
- 66. National Planning Policy Framework (NPPF) requires planning policies and decisions to aim to achieve healthy, inclusive and safe places. To help promote social interaction, improve safety and accessibility and to enable and support healthy lifestyles. A HIA allows the Council to clearly spot any conflict in the Local Plan with the requirements of NPPF.
- 67. Each policy option is subject to assessment in relation to health issues. These issues have been informed by the Dorset Health and Wellbeing Strategy and wider principles for planning for health living environments. And include:

Issues	Matters for consideration
Strong, vibrant and healthy communities	Reflecting upon the positive role of creating and maintaining attractive and prosperous communities.
Opportunities for physical activity as part of daily life	Specifically creating living environments with easily accessible opportunities to access services and facilities through walking and cycling and enjoyment of the public realm encourages physical activity.
Places to support community engagement	Supporting enhancements in wellbeing across a community through enhanced participation.
Social and cultural well-being	Reflecting upon the positive role of cultural activities and social events in contributing to the wellbeing of individuals.
Reducing health inequalities	A Dorset Health and Wellbeing Strategy priority.
Promoting healthy lifestyles	A further Dorset Health and Wellbeing Strategy priority. Key to supporting continued access to sport and leisure facilities that enable residents to undertake physical exercise.

68. Those that are likely to have a positive or no effect are assessed as 'Compatible'. Those that are likely to have a negative effect or where the assessment would need further information or research are assessed as being 'potential conflict'.

Local Plan	Issues in Relation	on to:				
Policies	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles
V1 Spatial strategy for sustainable communities	Positive	No impact	Positive (Social infrastructure needed in development proposals.)	Positive (Proposed to be in scale with current settlements so will be positive to how people perceive where they live.)	Positive (The allocated sites are widespread and therefore likely to have a positive impact)	Positive (Leisure facilities and infrastructure proposed)
V2 Greenbelt	No impact	Positive	No impact	Positive	No impact	Positive
E1 Landscape	No impact	Negative (Depends how strong the restrictions are but could stop activity in some locations)	No impact	Positive (Positive of picturesque landscapes for residents)	No impact	No impact
E2 Historic Environment	Positive (contributes to vibrant places)	No impact	No impact	Positive (Conserved environments to allow residents to have positive connection to their surroundings)	No impact	No impact

Local Plan	Issues in Relation	on to:				
Policies	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles
E3 Renewable Energy	Positive (improved air quality)	No impact	No impact	No impact	No impact	No impact
E4 Assessing Flood Risk	Positive (ensuring communities are not at risk from flooding by situating development in places of low risk)	No impact	No impact	No impact	No impact	No impact
E5 Sustainable Drainage Systems	Positive	No impact	No impact	No impact	No impact	No impact
E6 Coastal change management areas	No impact	No impact	No impact	No impact	No impact	No impact
E7 Conservation of protected sites	No impact	Negative (Could restrict access to areas which would be used for physical activity)	No impact	Positive (Protects landscapes for residents understanding of local identity- social impact)	No impact	No impact

Local Plan	Issues in Relation	n to:				
Policies	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles
E8 Dorset Heathlands	No impact	Negative (Could restrict access to areas which would be used for physical activity)	No impact	Positive (Protects landscapes for residents understanding of local identity- social impact)	No impact	No impact
E9 Poole Harbour	Positive (proposed to develop sustainable levels of recreational activity in Poole Harbour and plans to control sewerage drainage into the harbour)	No impact	No impact	Positive (proposed to develop sustainable levels of recreation and plans to control sewerage drainage into the harbour)	No impact	No impact
E10 Biodiversity and Geodiversity	No impact	No impact	No impact	No impact	No impact	No impact
E11 Development next to sewage treatment works and pumping stations	Positive (protects amenity of existing and future residents	No impact	No impact	Positive (protects amenity of future residents near these sites)	No impact	No impact

Local Plan	Issues in Relation	on to:				
Policies	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles
	near these sites)					
E12 Design	Positive (protects amenity of future residents, mitigates crime and promotes sustainable transport)	No impact	No impact	Positive (high quality design)	No impact	Positive (promotes sustainable transport)
H1 Local Housing Requirement	No impact	No impact	Positive (neighbourhood plans allow for community engagement)	No impact	No impact	No impact
H2 The housing land supply	No impact	No impact	No impact	No impact	No impact	No impact
H3 New housing development requirements	Positive (mitigation of pollution and promotion of sustainable travel and play areas)	Positive (promotes outdoor sport and travel routes)	No impact	Positive (Promotes social wellbeing through a number of points)	No impact	Positive (access is broadly considered and sustainable modes are promoted)
H4 Moreton Station/Redbridge Pit	Positive	No impact	No impact	No impact	No impact	Positive

Local Plan	Issues in Relation	on to:				
Policies	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles
	(financial contributions for health facilities)					(improved walking and cycle routes)
H5 Wool	Positive (mitigating noise and pollution)	Positive (promote footpaths and open spaces)	Positive (opportunity to provide community hub)	No impact	No impact	Positive (improved walking, cycle routes and open space)
H6 Lytchett Matravers	Positive (financial contributions for health facilities)	No impact	No impact	No impact	No impact	Positive (improved walking and cycle routes)
H7 Upton	Positive (mitigating noise and financial contributions for health facilities)	No impact	No impact	No impact	No impact	No impact
H8 Small sites next to existing settlements	No impact	No impact	No impact	No impact	No impact	No impact
H9 Housing Mix	No impact	No impact	No impact	No impact	No impact	No impact
H10 Part M of the Building Regulations	No impact	No impact	No impact	No impact	No impact	No impact
H11 Affordable Housing	No impact	No impact	No impact	No impact	No impact	No impact

Local Plan	Issues in Relation	on to:				
Policies	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles
H12 Rural exceptions sites	No impact	No impact	No impact	No impact	No impact	Positive (improved walking and cycle routes)
H13 Rural workers homes in the countryside	No impact	No impact	No impact	No impact	No impact	No impact
H14 Second Homes	No impact	No impact	No impact	No impact	No impact	No impact
H15 Gypsy, traveller and travelling showpeople	Positive (ensure access to health services etc and promotes neighbouring amenity)	No impact	No impact	No impact	No impact	No impact
Policy EE1 Employment land supply	No impact	No impact	No impact	No impact	No impact	No impact
Policy EE2 Planning for employment	Positive (ensures there would not be an adverse impact upon amenity)	No impact	No impact	No impact	No impact	Positive (promote sustainable transport for travelling to employment)

Local Plan	Issues in Relation	on to:				
Policies	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles
Policy EE3 Vibrant town centres	Positive (promote vibrant places for residents)	No impact	No impact	No impact	No impact	No impact
Policy EE4 Supporting vibrant and attractive tourism	No impact	No impact	No impact	No impact	No impact	No impact
Policy I1 Developer contributions to deliver Purbeck's infrastructure	Positive (financial contribution to specific health facilities eg GP surgeries and contribution to open space)	Positive (financial contribution to open space)	No impact	Positive (financial contribution to facilities which improve well- being)	No impact	Positive (financial contribution to improve access to health facilities and improved open space)
Policy I2 Improving accessibility and transport	Positive (improved transport and promotion of foot and cycle paths)	Positive (potential for improved footpaths for walking)	No impact	No impact	No impact	Positive (improved transport and promotion of foot and cycle paths)
Policy I3 Green infrastructure, trees and hedgerows	Positive (enhancing cycling and walking	Positive (enhancing cycling and walking	No impact	Positive (positive social well-being by improving	No impact	Positive (enhancing cycling and walking

Local Plan	Issues in Relation to:							
Policies	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles		
	between open spaces and countryside)	between open spaces and countryside)		surrounding areas and travel routes)		between open spaces and countryside)		
Policy I4 Recreation, sport and open space	Positive (promotes and enhances all aspects which contributes to improved health)	Positive (promotes and enhances all aspects which contributes to improved access to physical activity)	No impact	Positive (promotes and enhances all aspects which contributes to improved well- being)	No impact	Positive (promotes and enhances all aspects which contributes to improved access to facilities)		
Policy I5 Morden Park strategic suitable alternative natural green space and holiday park	No impact	Positive (the potential for a holiday park would promote outdoor activities)	No impact	No impact	No impact	Positive (the potential for a holiday park would promote outdoor activities)		
Policy I6 Wareham integrated health and social care	Positive (very positive contribution to improved health and well-being facilities)	No impact	Positive (potential for social care hub to improve community engagement)	Positive (direct positive impact on social well-being from the social care hub)	Positive (direct positive impact on reducing existing health inequalities)	Positive (improved facilities for health therefore improving access)		
Policy I7 Community facilities and services	Positive (promotion of community facilities	No impact	Positive (community facilities expected to	Positive (community facilities expected to	No impact	Positive (improved community facilities		

Local Plan Policies	Issues in Relation to:							
	Strong, vibrant and healthy communities	Opportunities for physical activity as part of daily life	Places to support community engagement	Social and cultural well-being	Reducing in health inequalities	Promoting healthy lifestyles		
	improves		improve	improve well-		therefore		
	general health		engagement for	being of local		improve access		
	of communities)		local residents)	residents)		to them)		

Part Six: Comments on the HIA

Discussion of the Purbeck Local Plan on equalities and health

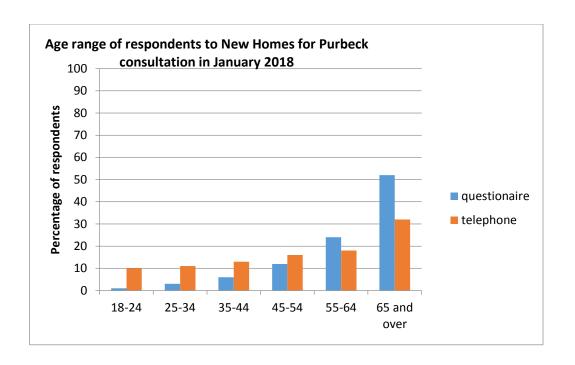
- 69. Most proposed policies are compatible. Any that may cause potential conflict are considered within the assessment tables above. The main equality issue is the impact of policies on rural isolation. However, taking the plan as a whole and the proposed mitigation measures within it, such as transport improvements, any impacts will be negligible. Looking at health impacts there is a known conflict between recreation and biodiversity. However, there should be sufficient opportunity to increase access to physical activity without a detrimental impact upon designated areas.
- 70. It is also important to note that the Bere Regis Neighbourhood plan and Wareham Neighbourhood plan will be addressing issues at a more focussed local level and that the Lytchett Matravers Neighbourhood plan and the Swanage Local plan have already addressed issues at more focussed levels.
- 71. The needs of the gypsy, traveller and travelling showpeople community will be considered through a jointly produced development plan document.

Discussion of the Communications Strategy on equalities issues

- 72. The EqIA assessment of the Communications Strategy indicates that the key elements of the Communications Strategy do not raise any significant equalities issues.
- 73. However, potential conflicts with age, disability, faith and belief, social inequalities and full representation of the households in relation to the use of social media, hard copy consultation documents and events were identified and are discussed below.

Age of residents

- 74. Contribution to indirect discrimination: Analysis of the New homes for Purbeck consultation carried out in January 2018 showed that just over 50% of respondents to the questionnaire were over 65. Whilst this is an improvement in terms of being more representative on responses from the Options Consultation it still does not mirror the make-up of the population of Purbeck. This suggests that the responses received are not representative of the entire population. However, the large numbers of telephone respondents are demographically representative, which gives good statistically reliable data.
- 75. When comparing data for the telephone respondents to the questionnaire respondents it is clear that the telephone survey has been necessary to achieve statistically reliable data. Despite efforts to ensure the materials were simply written and advertised well the age range responding to paper questionnaires is still very weighted towards the older residents.



- 76. Looking ahead to the forthcoming consultation respondents will be encouraged to respond online. Whilst increasingly accessible to all internet usage is lower in older age groups.
- 77. How this will be addressed: Due to the nature of the representations period on the Pre-Submission draft it will not be possible to carry out a telephone interview. Therefore, extra care will need to be taken to ensure that the opportunity to comment is appropriately advertised to ensure all ages are informed of the proposals. Use of social media including twitter and facebook will assist in distributing information about the Pre-submission draft to a wider demographic including young people. Council officers will be available to provide assistance to individuals seeking to respond to the consultation document online.

Disability

- 78. Contribution to indirect discrimination: The absence of organised events for the Local Plan Pre-submission Draft representations period means that there are no specific harmful effects arising from the venues themselves. However, the consultation process will as a consequence rely upon access to reading and understanding written consultation material. Meanwhile, whilst requesting online responses it is recognised that disabled individuals are evidenced to be more likely to be non-internet users than those who are not disabled. How this will be addressed:
- 79. Local Plan publication materials will be written in Ariel 12 point font. Large print documents and consultation response forms will be available on request. Council officers will be available to provide assistance to individuals seeking to respond to the consultation document online.
- 80. All Local Plan publication materials will be available on the Dorsetforyou website where most documents use 'text-to-speech' technology.

Social inequalities

- 81. Contribution to indirect discrimination: Planning documents can sometimes be difficult to understand due to the complex nature of the policies or options and jargon used.
- 82. People may not feel they are able to gain full insight in order to respond in an informed manner.
- 83. How this will be addressed: The publication draft plan, supporting documentation and guidance document are produced in plain English supplemented with images.
- 84. Officers will be available throughout the statutory six week period to provide information, explain the content of the draft plan and representations procedure and to answer questions.

Full representation of the household

- 85. Contribution to indirect discrimination: Only one notification will be sent to most households. As such individuals in a household whose views may differ may not feel they have an opportunity to respond.
- 86. How this will be addressed: The Council will consider clearly stating on the notification materials that responses are made on behalf of each individual unless explicitly identified as a group response. Online responses should enable greater individual freedom to respond.