



Rother District Council

# Rother District Council Proposed Submission Core Strategy incorporating Focused Amendments Equalities Impact Assessment



August 2012

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Issues &  
Options

Strategy  
Directions

Pre - Submission

Adoption

Examination



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## **1. Introduction**

- 1.1 This report details the results of the Equality Impact Assessment (EqIA) of the Rother District Council Proposed Submission Core Strategy incorporating the Focused Amendments. The main purpose of the EqIA is to assess whether the Proposed Submission Core Strategy affects different groups of people in different ways. It considers the likely impact on these different groups and how the needs of such groups have been taken into account in relation to the development of the Core Strategy and the policies contained within it.
- 1.2 The requirement to undertake an Equality Impact Assessment stems from the duty placed on public authorities to eliminate unlawful discrimination in carrying out its functions, and promote equality of opportunity. The assessment has been prepared in accordance with the Rother Equality Scheme 2010-2016.
- 1.3 Public authorities are specifically required to undertake an EqIA under The Equality Act 2010. The new Act ensures consistency in what is necessary to make our services and the workplace a fair environment and to comply with the new legislation. The Equality Act covers groups that were protected by existing legislation - age, disability, marriage and civil partnership, gender reassignment, race, sex, sexual orientation, religion and belief and pregnancy and maternity. These groups are now called 'protected characteristics'.

## **2. The Core Strategy**

- 2.1 The Core Strategy is one of the key documents forming the Council's Local Plan. The Core Strategy contains a set of overarching policies for the District aimed at delivering the strategic vision for District to 2028. It considered what development will be delivered across the District, along with how and when it shall be delivered across the lifetime of the plan, along with the need for any associated infrastructure.

### **Consultation**

- 2.2 The Core Strategy has been produced following extensive community consultation, the production of a robust evidence base to support the policies contained within the Strategy and joint-working with key partners including the Local Strategic Partnership, East Sussex County Council, Hastings Borough Council, local community groups and residents of Rother. Community engagement has been carried out throughout the drafting of the Core Strategy and most notable at the following stages:

- Issues and Options – October 2006

- Consultation on the Strategy Directions – November 2008 – January 2009
- Consultation on the Proposed Submission Core Strategy – August – November 2011.
- Consultation on the Focused Amendments to the Proposed Submission Core Strategy – June – July 2012

- 2.3 Further details about the various consultation stages and additional consultation carried out throughout the process can be found within the [Submission Core Strategy Consultation Statement – June 2012](#)<sup>1</sup> which has been produced in accordance with Regulation 22(c) – Statement of Compliance and sets out the persons invited to make representations, how those people/bodies were invited to make representations, a summary of the main issues raised and how these representations have been taken into account. Therefore this section has not repeated this information here.
- 2.4 It is considered that the consultation methods used at the various stages of production of the Core Strategy did not cause any adverse impact or discriminate against different groups in the community and that the in the Council’s attempts to frontload the plan preparation process, hard-to-reach groups were specifically targeted.
- 2.5 The Core Strategy was formally submitted to Government in July 2012, and the ‘soundness’ of the document will be considered by an independent Government appointed Inspector through the Examination process. The Examination hearings are scheduled to be conducted in November 2012. Further details regarding the timetable can be found within the Local Development Scheme (LDS) at [www.rother.gov.uk/lds](http://www.rother.gov.uk/lds) . This EqIA will form part of the documentation submitted to the Inspector.

### **3. The Approach to Equality Impact Assessment**

- 3.1 The Rother District Council Single Equality Scheme<sup>2</sup> promotes Equality and Diversity through service delivery and its employment. The Council is committed in making sure that there are equal life chances for all within the District. This may involve thinking creatively to make sure that people are given the chance to ensure that equality can become a reality. In line with the Local Government Framework, the Council includes all six equality strands:

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<sup>1</sup>[http://www.rother.gov.uk/media/pdf//3/Submission\\_Core\\_Strategy\\_Consultation\\_Statement\\_June\\_20121.pdf](http://www.rother.gov.uk/media/pdf//3/Submission_Core_Strategy_Consultation_Statement_June_20121.pdf)

<sup>2</sup><https://www.rother.gov.uk/index.cfm?Articleid=2800>

- Race,
- Disability,
- Gender,
- Religion and belief,
- Age, and
- Sexual Orientation.

3.2 As part of the Equality and Diversity agenda, the Council has a rolling programme to undertake Equality Impact Assessments on all of its policies, practices and procedures.

3.3 The purpose of these assessments is to ensure that a policy, practice or procedure is providing equality of opportunity and eliminating unlawful discrimination for everyone. The Council takes account of the needs, circumstances and experiences of those in the community who intends to benefit from a policy, practice or procedure. Apart from being used to identify potential inequalities in outcomes, they also help to consider ways of achieving the aims of policies and projects, which in turn improves customer service and increases public confidence in the fairness of policies and projects.

3.4 In preparing an EqIA a six stage process is followed:

Stage 1 – Initial Screening

Stage 2 – Scoping and defining

Stage 3 – Information gathering

Stage 4 – Making a judgement

Stage 5 – Action Planning

Stage 6 – Publication and review

### **3.1 Stage 1 – Initial screening**

3.1.1 The purpose of the screening process is to see if the Proposed Submission Core Strategy incorporating Focused Amendments presents any issues for any group of people. The screening process determines whether or not it is necessary to carry out a full Equality Impact Assessment for this area of work, with the main question being considered is whether the Core Strategy has the potential to cause any adverse impact or discrimination against different groups in the community.

- 3.1.2 The Core Strategy is the principal document within the Councils Local Plan. The Core Strategy sets the overall vision and strategic objectives for the District to 2028 and its long-term development. It contains a number of core policies which aim to deliver the vision and strategic objectives, it also sets out the broad quantum and locations for development. All subsequent Local Development Documents (LDDs) should follow the principles set within the Core Strategy.

### **Vision for Rother in 2028<sup>3</sup> ...**

**Rother District** is recognised for its high quality of life, where there is a strong emphasis on community life. This has been achieved by continuing to support and further develop vibrant, safe, balanced and inclusive communities.

There is a strong commitment to a more sustainable, low carbon future and adapting to climate change. There is sensitive stewardship of environmental resources and conservation of the area's outstanding environmental and cultural assets.

Sustainable economic growth has been secured, with much improved job opportunities, which encourage young people to stay in the area and provides greater prosperity for all.

Improved economic and social well-being has been facilitated by better access to jobs and services, in both urban and rural areas, and improved connectivity with the rest of the region, including through effective telecommunications networks.

Development and change has contributed significantly to meeting local needs and aspirations, having responded positively to the district's circumstances, as well as to regional and sub-regional imperatives.

There has been a notable improvement in economic conditions in the coastal towns of Bexhill and Rye as a result of a strong focus on regeneration in the 'Sussex Coast' sub-region, notably through close working with neighbouring Hastings.

Bexhill has retained and strengthened its distinct identity and become one of the most attractive places to live on the south coast - attractive to families, the young and older people alike. It is the main focus of development in the district, and this continues to enable improvements in the supply of jobs and services.

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<sup>3</sup> [www.rother.gov.uk/corestrategy](http://www.rother.gov.uk/corestrategy)

Rye has improved its economic and social circumstances whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting. It maintains a strong tourism sector and Port activities.

The inland and essentially rural areas of Rother, falling mainly within the High Weald AONB<sup>4</sup>, retain their essential local character.

Battle continues to be a thriving small market town and tourist centre which retains its character, with sensitive conservation of its historic core and setting.

The character and diversity of villages has also been retained. They are vibrant and inclusive, having evolved organically in a manner sensitive to their surroundings.

The countryside continues to be protected for its intrinsic value as well as being more accessible and economically active, while change is carefully managed to respect its character.

- 3.1.3 It is considered that the scope of the Core Strategy vision may have the potential for adverse impact or discrimination against different equality groups. Therefore it is considered necessary to carry out an EqlA of the Core Strategy.

### **3.2 Stage 2 – Scoping and defining**

- 3.2.1 In developing an EqlA it is appropriate to utilise differing perspectives and experiences in its preparation. Ideally the officers responsible for delivering the strategy are involved in its preparation along with others who have technical or specialist knowledge, where appropriate.

- 3.2.2 This EqlA has been prepared by Officers in the Planning Strategy Team who are responsible for the Core Strategy's preparation. Specific advice was obtained from the Council's Equalities Officer, with specific technical and specialist knowledge obtained from the Rother Equality and Diversity Working Group, which includes representation from across the Rother District Council, giving a wide range of expertise. Comments made by the group have been considered and incorporated within the Assessment as appropriate.

### **3.3 Stage 3 – Information Gathering**

- 3.3.1 In producing the EqlA, various sources of information has been gathered in order to determine whether the Core Strategy is likely to have an

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<sup>4</sup> Area of Outstanding Natural Beauty



adverse impact of discriminate against different groups within the community. Such sources of information include Census data, along with national and local statistics.

3.3.2 Table 1 (below) provides the baseline information of the different groups which are focussed upon as part of the assessment. The equality groups listed in Table 1 have been identified in the IDeA and PAS guidance and originate from UK legislation regarding discrimination. They are as follows:

- Age,
- Disability,
- Gender,
- Income and Deprivation,
- Race,
- Religion and Belief, and
- Sexual Orientation.

3.3.3 There are pockets of deprivation within the District as identified within the Index of Multiple Deprivation (2010). There are 2 super output areas (both in Sidley ward) which are in the worst 10% nationally. Given this information, it was considered appropriate to include low income groups in part of the assessment to consider whether they are unfairly discriminated against in comparison to other communities within Rother.

**Table 1: Equality Statistics**

<b>Equality Group</b>	<b>Rother District Summary</b>
Age	<p>The 2011 census population figure for Rother District is 90,600 persons in some 40,900 households. Most of the Districts population (29.2%) is aged 45-64, but a significant proportion (28.4%) is over 65 and 14.6% is under 15.</p> <p>Statistics from East Sussex County Councils policy based demographic projections (2011) show that between 2011 and 2028 there will be an increase in the Districts population of .86%.</p> <p>It is suggested that between 2011 and 2028 there will be a significant increase in the population in the over 75 age group at 49.4%, there are also forecast increases in the 65-74 age groups (21.7%). However, it is anticipated that the population of Rother District within the age groups 0-14, 15-29 and 30-44 will decrease (-15.8%; -14.8%; and -25.9 respectively) and the number of people within the age group 45-64 will remain relatively static.</p> <p>Evidence suggests that the largest proportion of older people live in the coastal area, notably in Fairlight (38.9%) and Bexhill (36.4%).</p>
Disability	<p>Information from the Rother District Housing Needs Survey identifies that 11.7% of all dwellings (4,544 implied) have been adapted to meet the needs of a disabled person. In terms of the nature of adaptations, 54.3% have handrails / grabrails, 46.1% have ground floor toilet adaptations, and 42.4% have adaptations to the access to the property.</p> <p>Data for the age groups of all disabled household members showed 69.7% of all disabled household members were over the age of 60 including 36.2% over 75; 12% were under 45.</p>
Gender	<p>The 2011 Census identifies that within the District there are more females (52.5%; 47,600 people)</p>

Equality Group	Rother District Summary																																																	
	<p>compared to males (47.5%; 43,000 people). This reflects the regional and national position. Although Rother has been identified as the area with the highest proportion of females to males in the country.</p> <p>Evidence (from the 2001 census) suggested that the largest proportion of females live in the coastal areas (2011 data at this geography is not currently available).</p>																																																	
Income and Deprivation	<p>As a whole, Rother District is recently moved into the lower half of authorities in terms of deprivation when ranked against all authorities (compared to the 2007 Index of Multiple Deprivation).</p> <p>The 2010 Indices of Multiple Deprivation indicates that Rother District is the 132<sup>nd</sup> least deprived local authority area in the UK out of a total of 326 local authorities. The District is the 3<sup>rd</sup> least deprived in East Sussex.</p> <table border="1" data-bbox="422 824 1902 1247"> <thead> <tr> <th data-bbox="422 824 695 915">Measure of deprivation</th> <th data-bbox="695 824 869 915">Average Score</th> <th data-bbox="869 824 1037 915">Average Rank</th> <th data-bbox="1037 824 1184 915">Extent</th> <th data-bbox="1184 824 1507 915">Local Concentration</th> <th data-bbox="1507 824 1654 915">Income Scale</th> <th data-bbox="1654 824 1902 915">Employment Scale</th> </tr> </thead> <tbody> <tr> <td data-bbox="422 915 695 971">Geography</td> <td data-bbox="695 915 869 971"></td> <td data-bbox="869 915 1037 971"></td> <td data-bbox="1037 915 1184 971"></td> <td data-bbox="1184 915 1507 971"></td> <td data-bbox="1507 915 1654 971"></td> <td data-bbox="1654 915 1902 971"></td> </tr> <tr> <td data-bbox="422 971 695 1026">Eastbourne</td> <td data-bbox="695 971 869 1026">84</td> <td data-bbox="869 971 1037 1026">68</td> <td data-bbox="1037 971 1184 1026">101</td> <td data-bbox="1184 971 1507 1026">116</td> <td data-bbox="1507 971 1654 1026">158</td> <td data-bbox="1654 971 1902 1026">163</td> </tr> <tr> <td data-bbox="422 1026 695 1081">Hastings</td> <td data-bbox="695 1026 869 1081">19</td> <td data-bbox="869 1026 1037 1081">23</td> <td data-bbox="1037 1026 1184 1081">24</td> <td data-bbox="1184 1026 1507 1081">19</td> <td data-bbox="1507 1026 1654 1081">124</td> <td data-bbox="1654 1026 1902 1081">126</td> </tr> <tr> <td data-bbox="422 1081 695 1136">Lewes</td> <td data-bbox="695 1081 869 1136">188</td> <td data-bbox="869 1081 1037 1136">179</td> <td data-bbox="1037 1081 1184 1136">217</td> <td data-bbox="1184 1081 1507 1136">216</td> <td data-bbox="1507 1081 1654 1136">222</td> <td data-bbox="1654 1081 1902 1136">231</td> </tr> <tr> <td data-bbox="422 1136 695 1192">Rother</td> <td data-bbox="695 1136 869 1192">139</td> <td data-bbox="869 1136 1037 1192">132</td> <td data-bbox="1037 1136 1184 1192">153</td> <td data-bbox="1184 1136 1507 1192">155</td> <td data-bbox="1507 1136 1654 1192">202</td> <td data-bbox="1654 1136 1902 1192">218</td> </tr> <tr> <td data-bbox="422 1192 695 1247">Wealden</td> <td data-bbox="695 1192 869 1247">253</td> <td data-bbox="869 1192 1037 1247">250</td> <td data-bbox="1037 1192 1184 1247">225</td> <td data-bbox="1184 1192 1507 1247">239</td> <td data-bbox="1507 1192 1654 1247">195</td> <td data-bbox="1654 1192 1902 1247">215</td> </tr> </tbody> </table>	Measure of deprivation	Average Score	Average Rank	Extent	Local Concentration	Income Scale	Employment Scale	Geography							Eastbourne	84	68	101	116	158	163	Hastings	19	23	24	19	124	126	Lewes	188	179	217	216	222	231	Rother	139	132	153	155	202	218	Wealden	253	250	225	239	195	215
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Race	Rother District has a low proportion of people from black and ethnic minority groups, with only 1.9% of the																																																	

Equality Group	Rother District Summary
	<p>population identifying themselves as an ethnic origin other than 'white' (Source: 2001 Census). This compares to the England average of 10%. Within the District there is a small travelling community group.</p> <p>There is no evidence to suggest a spatial variation within the District with regard to race.</p>
Religion or Belief	<p>The 2001 Census shows that the majority of the Rother District population see themselves as Christians (76.5%). This is slightly higher than the regional and national position (72.8% and 71.7% respectively). 13.9% of the population stated that they had 'no religion'.</p> <p>There is no evidence to suggest a spatial variation within the District with regard to religion or belief.</p>
Sexual Orientation	<p>There is very limited data relating to the sexual orientation of the Rother District population. The census 2001 identifies that 0.16% of the population who were 16 years old and above live in a same sex household. This reflects the regional and national position.</p> <p>There is no evidence to suggest a spatial variation within the District with regard to sexual orientation.</p>

### **3.4 Stage 4 – Making a Judgement**

- 3.4.1 The Core Strategy contains the strategic vision and objectives for the District to 2028. The policies contained within the Core Strategy aim to deliver the strategic vision and objectives. The policies contained within the Core Strategy will be assessed as part of the EqIA.
- 3.4.2 Table 2 (below) makes an assessment of the impact of the policies contained within the Core Strategy on the identified equality groups. The table contains a short summary of each policy, an assessment of the impact of the policy on each equality group, along with a summary of whether there is any potential impact by the policy on the equality groups.
- 3.4.3 The key below identified the symbols used to summarise the impact on an equality group for each Core Strategy policy.

#### **Key to Table 2**

<b>Symbol</b>	<b>Likely Impact</b>
+	Positive
o	Neutral/Negligible
-	Negative
N/A	Not Applicable

**Table 2: Screening the equality impacts of the Core Strategy incorporating the Focused Amendments**

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
<p><b>Policy OSS1: Overall Spatial Development Strategy</b></p> <p>This policy proposes that the majority of development is concentrated in the towns (Bexhill, Battle and Rye), with limited growth in the villages, whilst balancing ecological, agricultural, public enjoyment and intrinsic value of the countryside</p>	+	+	0	+	0	0	0	<p>Concentrating development in more accessible locations close to existing facilities and services should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes).</p>
<p><b>Policy OSS2: Bexhill to Hastings Link Road and development</b></p> <p>Considers that early construction of the Bexhill to Hastings Link Road is an integral, and critical, component of the development strategy for Bexhill and for the economic regeneration of the wider area.</p> <p>The policy incorporates a contingency plan if the Link Road is significantly delayed</p>	+	+	0	+	0	0	0	<p>This policy promotes the development of the Bexhill-Hastings Link Road but also provides a contingency plan if the Link Road is delayed or not built. It states that the release of some strategic allocated sites (for housing and employment) will not go ahead, subject to caveats. Therefore it is not expected that the surplus of development from targets, will be picked up by other towns and villages within the District. This ensures that development is concentrated to those locations which are</p>

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
or not built. It sets out how this will affect development in Bexhill and the wider area.								considered most sustainable. As the Link Road is link to economic regeneration of the area, this should have a positive impact on those with low incomes.
<p><b>Policy OSS3: Use of Development Boundaries</b></p> <p>This policy gives priority to development within defined development boundaries around settlements</p>	+	+	o	+	o	o	o	Concentrating development in more accessible locations close to existing facilities and services should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes).
<p><b>Policy OSS4: Location of development</b></p> <p>In assessing the need for a development, both when allocating land or determining planning applications, sites will be considered using a number of factors, including, existing infrastructure, making effective use of land within built up areas and local needs for affordable housing, for example</p>	+	+	o	+	o	o	o	Concentrating development in more accessible locations close to existing facilities and services should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes). The policy has a local needs focus, which in turn will help those on low incomes with particular regard to affordable housing.

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
<p><b>Policy OSS5: General Development Considerations</b></p> <p>Considers that development should, meet the needs for future occupiers and the provision of appropriate means of access for disabled users, not unreasonably harm neighbourhood amenities, not detract from character and appearance of the locality, be compatible with surrounding uses, have regard to surrounding densities.</p>	o	+	o	o	o	o	o	<p>General development considerations will have specific benefits to all, however there is a positive impact for those with a disability as specific provision for providing appropriate means of access is specifically referenced.</p>
<p><b>Policy BX1: Overall Strategy for Bexhill</b></p> <p>This policy seeks to deliver the main objectives for the Bexhill chapter, including conserving and enhancing the town's distinct and independent character and residential function, developing local amenities, promoting economic growth, prioritising deprived areas, improving transport, strengthening the</p>	+	+	o	+	o	o	o	<p>Provision for enhanced facilities within Bexhill, particularly where they are close to residential properties, is likely to have significant effects on particular groups. This will help reduce the need to travel and assist those households who do not have access to a car, this may include older and younger people and those who have low incomes.</p>



Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
role of the town centre and providing employment and housing growth.								
<p><b>Policy BX2: Bexhill Town Centre</b></p> <p>The policy seeks to enhance and strengthen the role of the town centre.</p>	+	+	o	+	o	o	o	Provision for enhanced facilities within Bexhill town centre, particularly where they are close to residential properties, is likely to have significant effects on particular groups. This will help reduce the need to travel and assist those households who do not have access to a car, this may include older and younger people and those who have low incomes.
<p><b>Policy BX3: Development Strategy</b></p> <p>This policy makes specific provision for additional housing and employment floorspace within Bexhill</p>	+	+	o	+	o	o	o	Concentrating development in more accessible locations close to existing facilities and services should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes).
<p><b>Policy HF1: The Hastings Fringes</b></p> <p>Promotes a strategy for conservation and development, including to continue developing proposals</p>	+	+	o	+	o	o	o	Concentrating development in more accessible locations close to existing facilities and services should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to

Policy	Equalities Group							Commentary
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for Combe Valley Countryside Park, take a holistic approach to the use and management of land between Ivyhouse Lane and Rock Lane, maintain existing countryside gaps, improve access to A21 at Baldslow, retain and give priority to employment creating development of at least 3,000sq.m and provide 45-80 additional dwellings.								<p>a car (older people, young people and those on low incomes).</p> <p>Continuing to develop proposals at Combe Valley Countryside Park, will help to promote managed access to the countryside, providing space to be used for leisure, relaxation, sport, ecology and education. This can have health benefits to a number of groups including older people, young people and those on low incomes.</p>
<p><b>Policy RY1: Policy Framework for Rye and Rye Harbour</b></p> <p>The policy seeks to improve connectivity to the town (roads and public transport), enhance the character of the Citadel and wider Conservation Area, retain the centre of Rye as the main focus for retail and services and provide additional retail convenience floorspace, provide additional housing within the built up area,</p>	+	+	o	+	o	o	o	<p>Concentrating development in more accessible locations close to existing facilities and services should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes).</p>

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
secure and maintain flood defences, provide additional employment floorspace, Maintain and enhance navigation on the River Rother and the viability of the Port of Rye, promote green tourism initiatives, Tackle social exclusion and promote opportunities for young people, Maintain and enhance the community, cultural and tourism assets and maintain a strategic gaps.								
<p><b>Policy BA1: Policy Framework for Battle</b></p> <p>The policy seeks to maintain local distinctiveness, minimise cross-town vehicular traffic and improve pedestrian and cycle access to services/ facilities, provide additional housing within development boundaries, enable local employment through additional development, enable growth in sustainable tourism, maintain a vibrant and distinctive town centre</p>	+	+	o	+	o	o	o	<p>Concentrating development in more accessible locations close to existing facilities and services should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes).</p> <p>Maintaining and improving access to open spaces can have health benefits to a number of groups including older people, young people and those on low incomes.</p>

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
with additional retail convenience floorspace, improve open space areas, and seek opportunities for habitat creation, restoration and enhancement.								
<b>Policy RA1: Villages</b>  The policy protects local distinctiveness, encourages sustainable economic growth and local job opportunities, supports retention of local services in villages, Supports community, recreational and educational facilities that provide social and community benefits to villages, provides for additional dwellings to ensure vitality of villages, and improve access to day to day services.	+	+	o	+	o	o	o	Concentrating development in more accessible locations close to existing facilities and services, and helping to maintain existing day to day services in rural areas, particular where they are in walking distance of existing homes should help reduce the need to travel and this may in particular benefit those with disabilities, and those who may not have access to a car (older people, young people and those on low incomes).
<b>Policy RA2: General Strategy for the Countryside</b>  The policy seeks to maintain farming capacity in the District, strictly limit development in the countryside to those developments which supports	+	+	o	+	o	o	o	Provision of facilities to support local agricultural, economic of tourism needs will be supported but development will be strictly limited to support these needs. Providing essential accommodation to support workers in rural areas will reduce

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
local agricultural, economic, or tourism needs, support rural employment opportunities, support the enjoyment of the countryside, and supporting tourism facilities.								the need to travel by those employed in within rural economies.
<p><b>Policy RA3: Development in the Countryside</b></p> <p>The policy details the limited circumstances when development may be acceptable in the countryside, particularly in relation to supporting land-based industries.</p>	+	+	o	+	o	o	o	Provision of facilities to support local agricultural, economic or tourism needs will be supported but development will be strictly limited to support these needs. Providing essential accommodation to support workers in rural areas will reduce the need to travel by those employed in within rural economies.
<p><b>Policy RA4: Traditional Historic Farm Buildings</b></p> <p>The policy demonstrates the hierarchical approach to the re-use of historic farm buildings, where the priority is to remain in farm-associated use, then for non-agricultural commercial uses, and then finally residential use may be considered acceptable.</p>	o	o	o	o	o	o	o	The hierarchical approach shows the priority for commercial uses in rural areas; where this is demonstrated that it is not appropriate, these buildings may be given over to residential use. It is considered that this policy has a negligible effect on equality groups.

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
<p><b>Policy SRM1: Towards a low carbon future</b></p> <p>This policy sets out the strategy to mitigate and adapt to climate change. In particular, developments of 10 dwellings or 1,000sq.m to provide a comprehensive energy strategy, developments of more than 100 dwellings or 50 apartments to require an assessment of potential for combined CHP &amp; district heating. The policy also sets out to support stand-alone energy schemes, high levels of energy performance on strategic sites, reducing carbon emission from existing buildings and promoting more sustainable travel patterns.</p>	+	o	o	+	o	o	o	<p>The promoting of new developments which contribute to a low carbon future could decrease heating and servicing costs in the home. This will benefit households with low incomes and older people as these groups are more likely to suffer from fuel poverty.</p>
<p><b>Policy SRM2: Water Management</b></p> <p>This policy promotes effective water management across the District, particularly with regard to new development, including the use of SUDs and the</p>	+	+	o	+	o	o	o	<p>Effective water management could lead to reduced water costs and this will benefit all households, but it is those on low incomes, disabled, older and young people who are likely to benefit most.</p> <p>Evidence shows that the impacts</p>

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promotion of water efficiency (rainwater and grey water storage and recycling). The policy also makes provision for safeguarding land at Bewl Water for the possible raising of the reservoir.								of climate change are likely to disproportionately negative effect those who are most vulnerable.
<p><b>Policy CO1: Community Facilities and Services</b></p> <p>The policy seeks the availability of community facilities to meet local needs, including permitting new, improved or replacement facilities where there are identified needs, facilitating the co-location of facilities, resisting the loss of community facilities and services across the District.</p>	+	+	o	+	o	+	o	The provision of new and Improved community facilities and services will benefit all equalities groups, however they are likely to have particular benefits to certain groups. Facilities such as schools and community centres will benefit disabled, older and younger people, particularly where they are in sustainable locations. This policy also covers places of worship.
<p><b>Policy CO2: Provision and Improvement of Healthcare Facilities</b></p> <p>The policy provides for new and improved primary healthcare facilities, to meet in the needs of the future population.</p>	+	+	o	+	o	+	o	New and improved healthcare facilities will benefit all minority groups, however they are likely to have particular benefits to certain groups. Facilities such as doctors surgeries will benefit disabled, older and younger people, particularly where they are in sustainable locations.

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
<p><b>Policy CO3: Improving Sports and Recreation Provision</b></p> <p>The policy provides for the provision of sufficient, well-managed accessible open spaces, sports and recreation facilities, including indoor sports facilities. This includes safeguarding existing facilities, provision of new sites where there is identified deficiencies, increasing access to the countryside, provision of water-based recreation and the application of quantity, quality and access standards.</p>	+	+	o	+	o	o	o	<p>New and improved sports and recreation facilities, particularly where there are identified deficiencies can help benefit all members of the community. In particular, there will be more benefits for older and young people, particularly as hubs to meet others and the related health benefits associated with increased provision of health and recreation facilities. This may also have particular benefits for those in low income groups, particularly where activities are free and easily accessible. Those with disabilities may also experience benefits by improving access to facilities.</p>
<p><b>POLICY CO4: Supporting Young People</b></p> <p>This policy provides for priority to be given to making Rother more attractive as a place for young people to grow up, live and work. It provides for the provision of housing options, employment, education and training, investment in public</p>	+	o	o	o	o	o	o	<p>Young people are an identified priority in Rother. The Strategy makes a specific positive contribution to making the District more attractive to young people.</p>



Policy	Equalities Group							Commentary
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transport and making safety and community integration a priority in urban design.								
<p><b>Policy CO5: Supporting Older People</b></p> <p>This policy supports older people within the District, and supports initiatives and developments which support older people to live independently in their own home, increases the range of housing options, promotes active lifestyles and increases engagement in community life.</p>	+	o	o	o	o	o	o	Older people are an identified priority in Rother. The Strategy makes a specific reference to initiatives and developments which support older people within the District.
<p><b>Policy CO6: Community Safety</b></p> <p>The policy promotes a high level of community safety. Safe physical environments will be facilitated by the creation of well designed environments, ensuring developments avoid prejudice against road and/or pedestrians and reduce traffic speeds and other traffic impacts.</p>	o	+	o	o	o	o	o	Good design of environments is an identified priority in Rother. Although they will have direct benefits for everyone in the community, well designed environments will have direct benefits for those with disabilities when examining movement and access through physical environments.

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
<p><b>Policy LHN1: Achieving Mixed and Balanced Communities</b></p> <p>This policy seeks to support mixed, balanced and sustainable communities by meeting current and future housing needs. Particularly in relation to provides smaller dwellings in rural areas where needs are highest and family dwellings within Bexhill. Larger housing schemes should provide a mix of dwellings, and those schemes providing affordable housing should contribute to an overall balance of 65%:35% split of social/affordable rented:intermediate affordable housing. Affordable housing should also be integrated with market housing. Schemes should provide a proportion of housing to lifetime homes standards.</p>	+	+	o	+	o	o	o	<p>Creating mixed, balanced and sustainable communities will help with integration of different equality groups. Provision of smaller dwellings in rural areas will help those on low incomes, as well as young and older people. The provision of family dwellings in Bexhill will help young families remain in sustainable locations. The provision of housing to Lifetime Homes standards will also benefit people with disabilities.</p>
<p><b>Policy LHN2: Affordable Housing</b></p> <p>The policy sets out the</p>								<p>Additional affordable housing will benefit households with low incomes and may also bring benefits to those with disabilities,</p>

Policy	Equalities Group							Commentary
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parameters where affordable housing will be required to be delivered. The policy seeks to provide more affordable housing within the rural areas.	+	+	0	+	0	0	0	along with older and younger people, as these groups tend to have a higher housing need.
<b>Policy LHN3: Rural Exception Sites</b>  The policy sets out the parameters regarding the exceptional circumstances when a rural exception site will be permitted and the requirements which such a site should meet.	+	+	0	+	0	0	0	Additional affordable housing will benefit households with low incomes and may also bring benefits to those with disabilities, along with older and younger people, as these groups tend to have a higher housing need.
<b>Policy LHN4: Sites for Wholly or Substantially Affordable Housing</b>  This policy makes provision for the possibility of allocating housing sites within development boundaries for wholly or substantially affordable housing.	+	+	0	+	0	0	0	Additional affordable housing will benefit households with low incomes and may also bring benefits to those with disabilities, along with older and younger people, as these groups tend to have a higher housing need.
<b>Policy LHN5: Sites for the needs of Gypsies and Travellers.</b>  The policy seeks to ensure	+	+	0	+	+	0	0	Gypsies and Travellers are a recognised minority group and therefore this policy will benefit this equality group. Permanent pitches within the District provide

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adequate levels of provision for additional permanent Gypsy and Traveller pitches within the District over the plan period.								benefits for people with disabilities, young and older residents of the Gypsy and Traveller community as they will be able to benefit from continued access to educational and healthcare facilities. It is also acknowledged that a proportion of Gypsies and Travellers also have low incomes.
<p><b>Policy LHN6: Gypsies, Travellers and Travelling Showpeople Criteria</b></p> <p>The policy sets out the criteria that will be used to identify additional sites within the Development and Site Allocations DPD and to consider planning applications for sites.</p>	+	+	o	+	+	o	o	Gypsies and Travellers are a recognised minority group and therefore this policy will benefit this equality group. Permanent pitches within the District provide benefits for people with disabilities, young and older residents of the Gypsy and Traveller community as they will be able to benefit from continued access to educational and healthcare facilities. It is also acknowledged that a proportion of Gypsies and Travellers also have low incomes.
<p><b>Policy EC1: Fostering Economic Activity and Growth</b></p> <p>The policy seeks to promote</p>								Facilitating the infrastructure and support networks to complement businesses within the District will help promote Rother as good location for businesses. This in

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economic activity and growth vital to the district's future prosperity, particularly in terms of education, training and development, effective business support services and business networks, give priority to investment in transport infrastructure and services, and facilitating investment in high quality ICT connections.	+	+	0	+	+	0	0	turn will help provide additional jobs where businesses are attracted to the area and/or expand, this will benefit the wider community. Improving the quality of and access to education may also have benefits for particular minority groups where access to quality education can be difficult, as well as those on low incomes.
<p><b>Policy EC2: Business Land and Premises</b></p> <p>This policy seeks to provide a suitably broad and readily available supply of business land and premises, including 100,000sq.m of employment floorspace, increasing the supply of high quality employment sites, improving the supply and range of small-medium sized sites and units in the towns and villages, providing for business development in locations that make effective use of rail and water transport opportunities</p>	+	+	0	+	0	0	0	Providing a suitable and readily available supply of business land and premises will help provide additional jobs opportunities. Locating employment development in the most accessible locations may particularly benefit those households without access to a car (Young people, Older People, those on low incomes).

Policy	Equalities Group							Commentary
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and seeking town centre, or edge of centre, sites for offices, including as part of mixed-use developments								
<p><b>Policy EC3: Existing Employment Sites</b></p> <p>This policy seeks to retain land and premises currently (or last) in employment, including tourism use, permitting intensification, conversion, redevelopment and/or extension of employment land or premises, and facilitating access/environmental improvements. Where viability of an employment scheme is in question, priority is given to enabling development to seek continued use of the site for employment use.</p>	+	+	0	+	0	0	0	<p>Providing a suitable and readily available supply of business land and premises will help provide additional jobs opportunities. Locating employment development in the most accessible locations may particularly benefit those households without access to a car (Young people, Older People, those on low incomes).</p>
<p><b>Policy EC4: Business Activities Elsewhere Within the District</b></p> <p>This policy seeks to give continuing priority to the re-use and adaptation of suitable buildings in the countryside for employment and tourism</p>	+	+	0	+	0	0	0	<p>Providing a suitable and readily available supply of business land and premises will help provide additional jobs opportunities. Locating employment development in the most accessible locations and promotion of homeworking may particularly benefit those</p>

Policy	Equalities Group							Commentary
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purposes, facilitating the viability of areas in the District, by converting residential properties to business use (subject to acceptable impact on character and amenity), and incorporating an appropriate level of business development within residential allocations and developments to contribute to the overall development strategy.								households without access to a car (young people, Older People, those on low incomes). The promotion of home-working may benefit those who are disabled.
<b>Policy EC5: Support for Key Sectors</b>  The policy details regard to particularly employment sectors in considering sites for employment purposes.	o	o	o	o	o	o	o	Providing a suitable and readily available supply of business land and premises will help provide additional jobs opportunities to all. It is not considered that this will have a particular effect on any equality group.
<b>Policy EC6: Tourism Activities and Facilities</b>  The policy seeks to encourage proposals relating to tourism activities and facilities.	o	o	o	o	o	o	o	The development and enhancement of tourism activities will help provide additional jobs opportunities to all. It is not considered that this will have a particular effect on any equality group.
<b>Policy EC7: Retail Development</b>  The policy states the overall	+	+	o	+	+	o	o	Locating retail development in the most accessible locations may particularly benefit those households without access to a

Policy	Equalities Group							Commentary
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strategy for retail and related service uses in Rother district, particularly in relation to supporting town centres. It also sets the sequential approach to retail site selection.								car (Young people, Older People, those on low incomes).
<p><b>Policy EN1: Landscape Stewardship</b></p> <p>This policy considers that the management of the high quality historic, built and natural landscape character is to be achieved by ensuring the protection, and wherever possible enhancement, of the District's nationally designated and locally distinctive landscapes and landscape features.</p>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	It is not anticipated that this policy will impact on any specific group.
<p><b>Policy EN2: Stewardship of the Historic Built Environment</b></p> <p>This policy sets the criteria for which development affecting the historic built environment, including that both statutorily protected and the non-statutorily protected will be</p>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	It is not anticipated that this policy will impact on any specific group



Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
required to do.								
<b>Policy EN3: Design Quality</b>  This policy sets the parameters for which design quality in new development.	o	+	o	o	o	o	o	Although there may not be any direct impact relating to design quality, good legibility of development schemes can provide good access through developments which may have an impact on those with a disability.
<b>Policy EN4: Management of the Public Realm</b>  The policy considers that priority will be given to working with the relevant agencies to manage the public realm.	o	+	o	o	o	o	o	Although there may not be any direct impact relating to management of the public realm, the reduction of street clutter and road signage can may have an impact on those with a disability.
<b>Policy EN5: Biodiversity and Green space</b>  The policy seeks to protect and enhance biodiversity, geodiversity and greenspace within the District. A particular area of focus includes the establishment of a major area of accessible open space at Combe Valley Countryside Park, between Bexhill and Hastings.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	It is not anticipated that this policy will impact on any specific group

Policy	Equalities Group							Commentary
	Age	Disability	Gender	Income Deprivation	Race	Religion / Belief	Sexual Orientation	
<p><b>Policy EN6: Flood Risk Management</b></p> <p>This policy seeks to develop an effective and inclusive approach to flood risk management, in partnership with relevant agencies and strategic partners. The policy also has particular regard flood defences in relation to sensitive environmental areas.</p>	+	+	o	+	o	o	o	Reducing the impacts of climate change and the resultant risks to the community would benefit all groups. Older people, young people and those on low incomes are considered to be disproportionately effected by the impacts of climate change.
<p><b>Policy EN7: Flood Risk and Development</b></p> <p>This policy seeks to avoid new development being built in areas which are liable to flood and the provision of measures to reduce flooding such as SUDs.</p>	+	+	o	+	o	o	o	Reducing the impacts of climate change and the resultant risks to the community would benefit all groups. Older people, young people and those on low incomes are considered to be disproportionately effected by the impacts of climate change.
<p><b>Policy TR1: Management and Investment in Strategic Accessibility</b></p> <p>The policy seeks to support the improvement of strategic infrastructure that will strengthen the role of Rother, and especially Bexhill, as an</p>	+	+	o	+	o	o	o	The provision of increased transport options will benefit those with disabilities, older and younger people, and those on low incomes, particularly where they do not have access to a car.

Policy	Equalities Group							Commentary
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area of economic activity and investment opportunity. Priority will be to improve connectivity along key transport corridors; enable regeneration and reduce entrenched economic and social disparities. Particular support is made to the early implementation of the Bexhill to Hastings Link Road.								
<b>Policy TR2: Integrated Transport</b>  The policy seeks improvements in the provision and use of sustainable transport will be achieved through a number of measures, particularly in relation to public transport and recycling.	+	+	o	+	o	o	o	The provision of increased sustainable transport options will benefit those with disabilities, older and younger people, and those on low incomes, particularly where they do not have access to a car.
<b>Policy TR3: Access and New Development</b>  The policy considers that new development should minimise the need to travel and support good access to employment, services and communities facilities, as well as ensure	+	+	o	+	o	o	o	The provision of increased sustainable transport options will benefit those with disabilities, older and younger people, and those on low incomes, particularly where they do not have access to a car.

Policy	Equalities Group							Commentary
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adequate, safe access arrangements. Priority is given to the needs of pedestrians, cyclists and minimising the distance to public transport nodes.								
<b>Policy TR4 – Car Parking</b>  The policy sets the guidelines for car parking provision within the District, including provision for disabled spaces. Consideration is made to means other than the car and where sites are located in accessible locations, reduced parking provision will be sought.	+	+	o	+	o	o	o	The provision of increased sustainable transport options will benefit those with disabilities, older and younger people, and those on low incomes, particularly where they do not have access to a car. Provision of disabled car parking spaces gives priority to this minority group.
<b>Policy IM1: Monitoring Framework</b>  This policy states that the effectiveness of Core Strategy policies will be in achieving the strategic objectives will be monitored and reported in the Annual Monitoring Report.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	It is not anticipated that this policy will impact on any specific group
<b>Policy IM2: Implementation and Infrastructure</b>								It is not anticipated that this policy will impact on any specific group

Policy	Equalities Group							Commentary
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The policy seeks to make provision for new/improved infrastructure needed throughout the plan period by provision or contributions. The Infrastructure Delivery Plan will contain the 'live' identified infrastructure provision.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
<b>Policy IM3: Phasing of development</b>  The policy seeks to provide new development in a timely manner (allocating sites and considering planning applications) insofar as it contributes to overall and local development strategies, and is or will be served by the infrastructure needed to support the development.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	It is not anticipated that this policy will impact on any specific group

### **3.5 Stage 5 and 6 – Action Planning, and Publication and Review**

- 3.5.1 As the EqIA has not identified any adverse impacts on equality groups it is therefore not considered necessary to move onto Stage 5 – Action Planning.
- 3.5.2 The publication of this EqIA follows on from the consultation on the Proposed Submission Core Strategy and consequently the further consultation on the Focused Amendments to the Proposed Submission Core Strategy. This EqIA reflects the policy wording changes included in the Submission Core Strategy incorporating the Focused Amendments, which was submitted to Government in July 2012 for consideration by an independent inspector through an Examination in Public.

## **4. Conclusion**

- 4.1 This EqIA has examined whether the Submission Core Strategy incorporating the Focused Amendments and the associated consultation arrangements have an adverse impact or discriminated against different groups in the community,
- 4.2 The assessment identified that all policies within the Core Strategy are likely to have either no differential impact or a positive impact on different equality groups and therefore it is not necessary to continue onto the latter stages of the EqIA process, particularly in terms of action planning, as there is no identified adverse impact on the equality groups. The identified benefits will also have benefits for the wider community. There are some policies within the Core Strategy which favour or target certain groups, the justification for these approaches can be found within the Council's evidence base, the consultation undertaken through the stages of Core Strategy production and the framework provided by Government guidance. These policies aim to take positive action in targeting and meeting local needs, by creating 'a level playing field' in accessing services.
- 4.3 Based on the judgements made in the EqIA, it is not considered that any measures are required to mitigate against any adverse impacts that any policy may have. However, the Council will monitor the implementation and impact of the Core Strategy policies through the production of the Annual Monitoring Report (AMR). The Core Strategy sets out the monitoring framework which should provide a robust basis for future monitoring.