

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

June 2014

Blackpool Council



# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

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## Contents

1. Purpose	03
2. Background	04
3. The Equality Analysis Approach	05
4. Initial Impact Assessment	07
5. Purpose and Aims of the Core Strategy and Individual Policies	08
6. Consideration of Existing Information (Step 2)	10
7. Analysing the Impact or Effects on Different Groups (Step 3)	12
8. Dealing with Adverse or Unlawful Impact (Step 4)	24
9. Consultation and Decision (Steps 5 and 6)	25
10. Monitoring and Review (Step 7)	26
11. Action Planning (Step 8)	26

## Blackpool Core Strategy Proposed Submission Equality Analysis

**Department:** Planning

**Team or Service Area Leading Assessment:** Development Plans and Projects Team

**Title of Policy/ Service Function:** Blackpool Core Strategy - Proposed Submission (Proposals to introduce and replace policy).

**Date of Proposals:** June 2014

**Lead Officer:** Jane Saleh, Head of Development Plans & Projects

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

## 1. Purpose

1.1 All local planning authorities are required to produce a set of documents collectively known as the Local Plan<sup>1</sup> which sets out the planning strategy and policies for an area. The Core Strategy is the main Local Plan document, and will replace a number of remaining saved policies of the current Blackpool Local Plan 2001/2016 (adopted 2006).

1.2 The Blackpool Local Plan Part 1: Core Strategy (the Core Strategy) sets out Blackpool Council's proposed strategic policies and development proposals to deliver its vision for Blackpool to 2027. Before the Core Strategy can be adopted there are a number of stages which we must follow (figure 1). Each stage has provided an opportunity for the community and other stakeholders to be involved in choosing the right planning policies for Blackpool.

1.3 The Core Strategy is currently at the Proposed Submission stage and will be subject to public consultation with comments invited on the 'soundness'<sup>2</sup> and legal compliance of the document. After considering all comments received on the Proposed Submission document, a 'Submission' document will then be submitted to the Secretary of State for Examination in Public.

1.4 An Equality Analysis has been undertaken for the Core Strategy to ensure the document takes account of all relevant and appropriate equality considerations. This analysis provides a detailed assessment of the potential implications of the Blackpool Core Strategy on achieving greater equality for affected groups and documents how these considerations have been incorporated into the evolving proposals and policy content of the Core Strategy.

**Figure 1: Core Strategy Preparation and Milestones**



<sup>1</sup> National Planning Policy Framework, March 2012

<sup>2</sup> A Core Strategy must meet the tests of 'soundness' before it can be adopted. This means that it is positively prepared, justified, effective and consistent with national policy (NPPF, Para 182).

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

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### **2. Background**

2.1 An Equality Impact Assessment was carried out for policies in the Blackpool Preferred Option Core Strategy (2010) in preparation for public consultation. Since 2010, there have been a number of changes, both nationally and locally, which have required policies in the Core Strategy to be reviewed.

2.2 In addition, since the Core Strategy Equality Impact Assessment was undertaken in 2010, changes have occurred to national equality legislation following the introduction of the Equality Act 2010, which became law in October 2010. The Act aims to streamline all previous anti-discrimination laws within a single Act. The new public sector Equality Duty, which is part of the Equality Act 2010, came into effect April 2011 and requires that all public bodies (including Local Authorities) to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities.

2.3 In 2012, an Equality Analysis (previously known as an Equality Impact Assessment) was undertaken for the Revised Preferred Option Core Strategy, which updated the previous Equality Impact Assessment to reflect and document how equality considerations have influenced the plan-making process in preparing the Core Strategy. This also included an assessment of the three new Protected Characteristics (gender reassignment; marriage and civil partnership; and pregnancy and maternity) that were identified in the Equality Act 2010 and therefore were not assessed previously.

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

## 3. The Equality Analysis Approach

3.1 Equality Analysis is a tool that helps public authorities fulfil their legal obligations by making sure their policies, and the way they carry out their functions and make decisions, do what they are intended to do and for everybody.

3.2 Carrying out an Equality Analysis involves systematically assessing the likely (or actual) effects of policies on people in respect of key quality strands and protected characteristics. This includes looking for opportunities to promote equality that have previously been missed or could be better used, as well as negative or adverse impacts that can be removed or mitigated, where possible. If any negative or adverse impacts amount to unlawful discrimination, action must be taken to remove them.

3.3 This Equality Analysis has therefore been undertaken based on an appropriate and proportionate approach in line with the nine main steps set out in the Blackpool Council guidance on carrying out an Equality Analysis. This Equality Analysis provides an overall assessment of the Core Strategy as a whole and provides an analysis of potential impacts on a range of groups, including Protected Characteristics, of individual policies in the Proposed Submission Core Strategy. The Equality Act 2010 identifies nine Protected Characteristics which should be considered in an Equality Analysis, these are:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

3.4 There are 9 main steps to take when carrying out Equality Analysis. These are:

**Figure 2: Main Steps in Carrying out an Equality Analysis**

1	Identifying the purpose and aims of the policy, service or function, or any proposals being made
2	Consider any information, data or research that is already available in relation to equalities
3	Making an assessment of the impact or effects on different equality groups and protected characteristics
4	Considering whether there is anything which could be done to mitigate against or to remove any adverse impact or effects, or to further promote equality, social inclusion or community cohesion
5	Consulting those affected for their views and ideas
6	Deciding whether or not to go ahead with your policy, procedures, proposals, or changes to services
7	Deciding how policy, proposals or other changes will be monitored and reviewed
8	Where necessary, adding the main actions arising from the analysis to the service business plan
9	Writing up the Equality Analysis to record the outcomes

3.5 An initial simplified impact assessment of all policies has been undertaken as the first stage of the Equality Analysis. A 'Step 1' assessment of the purpose, aims and content of the Proposed Submission Core Strategy as a whole has been undertaken as part of the Equality Analysis. Further information is then provided on each policy, which identifies if there is a potential impact or effect on different communities or groups.



# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

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Otherwise, the focus of the Equality Analysis is on the Core Strategy as a whole. Therefore:

- For 'Step 1' the purpose, aims, and potential impacts have been identified and considered for the Core Strategy as a whole.
- For 'Step 2' a summary of all available information, data and research is provided to give an overview of the evidence base which has informed the development of the Blackpool Local Plan Part 1: Core Strategy – Proposed Submission document.
- 'Step 3' (assessing the impacts or effects on different equality groups and Protected Characteristics) has been undertaken for each policy of the Proposed Submission document to assess the potential implications of the proposals on different groups, which is then followed by a summary identifying the potential impacts on the nine Protected Characteristics.
- No 'Step 4' adverse impacts have been identified. It is a priority of the Core Strategy to promote community cohesion, support regeneration, and tackle deprivation and inequalities – and this conclusion is consistent with this focus.
- While no adverse impacts have been identified, a comprehensive assessment 'Step 5' consultation will take place in line with the normal planning requirements for preparing the Core Strategy as part of the Blackpool Local Plan. This Equality Analysis and an independent Sustainability Appraisal and Habitat Regulation Assessment of the Core Strategy will be made publicly available as part of the public consultation process.
- In terms of 'Step 6' (decision), the results of the consultation will inform the Council's final decision on the policies to be included in the subsequent Submission edition of the Core Strategy, which will be submitted to the Secretary of State for independent assessment at an Examination in Public before the Planning Inspectorate.
- 'Step 7' (monitoring and review) is an integral part of the planning process, and this will include specific monitoring of the Core Strategy goals, objectives and policies.
- 'Step 8' (action plan) of the Core Strategy Equality Analysis is focused on drawing up the key indicators to ensure the impacts of the Core Strategy policies, when finalised, can properly be assessed by the development of an effective monitoring system. The success or otherwise of the policies of the Core Strategy will inform subsequent more detailed policy development and/ or review of the Blackpool Local Plan.

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

## 4. Initial Impact Assessment

4.1 Figure 3 identifies all policies contained within the Proposed Submission Core Strategy and provides an initial impact assessment of the policies in terms of their potential impact (positive or negative) on different groups.

4.2 An analysis of the purpose and aims of each policy has been undertaken in section 7, which provides further detail regarding the potential impact of each policy.

**Figure 3: Initial Impact Assessment Checklist**

Core Strategy Policies	Equality Impact	
	Policy Neutral	Potential Impact
<b>Spatial Strategy</b>		
Policy CS1: Strategic Location of Development	✓	
<b>Core Policies</b>		
Policy CS2: Housing Provision		✓
Policy CS3: Economic Development and Employment		✓
Policy CS4: Retail Hierarchy		✓
Policy CS5: Connectivity		✓
Policy CS6: Green Infrastructure		✓
Policy CS7: Quality of Design		✓
Policy CS8: Heritage	✓	
Policy CS9: Water Management		✓
Policy CS10: Sustainable Design and Renewable and Low Carbon Energy		✓
Policy CS11: Planning Obligations		✓
<b>Strengthening Community Wellbeing</b>		
Policy CS12: Sustainable Neighbourhoods		✓
Policy CS13: Housing Mix, Density and Standards		✓

Policy CS14: Affordable Housing		✓
Policy CS15: Health and Education		✓
Policy CS16: Traveller Sites		✓
<b>Regenerating Blackpool Town Centre and Resort Core</b>		
Policy CS17: Blackpool Town Centre		✓
Policy CS18: Winter Gardens	✓	
Policy CS19: Central Business District (Talbot Gateway)	✓	
Policy CS20: Leisure Quarter (Former Central Station Site)	✓	
Policy CS21: Leisure and Business Tourism	✓	
Policy CS22: Key Resort Gateways	✓	
Policy CS23: Managing Holiday Bed Spaces		✓
<b>Enabling South Blackpool Growth and Enhancement</b>		
Policy CS24: South Blackpool Employment Growth	✓	
Policy CS25: South Blackpool Housing Growth	✓	
Policy CS26: Marton Moss: Safeguarding and Enhancement	✓	
Policy CS27: South Blackpool Transport and Connectivity	✓	
<b>Delivering the Vision</b>		
Monitoring and Implementation Plan	✓	

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

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## 5. Purpose and Aims of the Core Strategy and Individual Policies (Step 1)

### Blackpool Core Strategy Revised Preferred Option

1. *What type of policy, service or function is this?*

New/ proposed policy

2. *What is the aim and purpose of the policy, service or function?*

The preparation of a Local Plan is a requirement of the Planning and Compulsory Act 2004 and the National Planning Policy Framework (2012). The aim of the Blackpool Local Plan Part 1: Core Strategy is to provide a long-term spatial strategy within which the economic, social and environmental needs of Blackpool can be met.

The Core Strategy will, when adopted by the Council, be the main overarching planning policy document in the Council's Local Plan. The Local Plan can be a suite of documents that aim to deliver specific things such as homes, jobs, transport, parks, schools and other public services, in the most appropriate and accessible locations, over the next 15 years. It provides the legal framework for the granting or refusal of planning permission, and sets out policies for the location and amount of new build development to meet the Core Strategy spatial vision.

3. *Please outline any proposals being considered.*

The Core Strategy spatial vision and the four overarching goals underpinning this vision, support a dual focus on regeneration and supporting growth to deliver the changes required in Blackpool and to meet the needs of Blackpool's residents now and in

the future.

The strategic proposal of the Core Strategy is to focus Blackpool's future growth, development and investment on Inner Area regeneration, which consists of Blackpool Town Centre, the Resort Core and neighbourhoods in the Inner Area, and to promote supporting growth and enhancement in South Blackpool to help meet wider housing and employment needs.

4. *What outcomes do we want to achieve?*

The Core Strategy identifies 'A Vision for Blackpool' which outlines where Blackpool aspires to be by 2027, and is the outcome the Council seeks to achieve through the proposed Core Strategy policies. The Core Strategy sets out four goals which underpin the spatial vision for Blackpool, these are:

**GOAL 1:** Sustainable regeneration, diversification and growth

**GOAL 2:** Strengthen community wellbeing to create sustainable communities and reduce inequalities in Blackpool's most deprived areas

**GOAL 3:** Regeneration of the town centre, resort core and inner areas to address economic, social and physical decline

**GOAL 4:** Supporting growth and enhancement in South Blackpool to meet future housing and employment needs for Blackpool and the Fylde Coast



# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

5. *Who is the policy, service or function intended to help/benefit?*

The Core Strategy applies to the whole borough, therefore the proposed policies are intended to benefit all communities in Blackpool.

In particular, the focus on Inner Area regeneration seeks to help those areas and neighbourhoods in Blackpool where there is an identified need to address economic, social and physical decline, and to improve the quality of life and wellbeing of residents in those areas.

6. *Who are the main stakeholders/ customers/ communities of interest?*

The Core Strategy is a planning policy document that is relevant to the entire borough, therefore communities of interest could include any individuals, groups and organisations that live, work or operate within the borough. Other key stakeholders for the Core Strategy include a range of statutory consultees such as the Environment Agency, Homes and Communities Agency and English Heritage.

The Core Strategy has a comprehensive consultee database of community groups and individuals who are directly informed of public consultation. Key stakeholders have been involved from the start of the Core Strategy process and have provided feedback and comments on the Core Strategy at each stage.

Therefore, a range of stakeholders will be consulted as part of public consultation on the Proposed Submission Core Strategy.

7. *Does the policy, service or function have any existing aims in relation to Equality/ Diversity or community cohesion?*

Goal 2 of the Core Strategy seeks to strengthen community wellbeing, create sustainable communities and reduce inequalities in Blackpool's most deprived areas, and will be achieved through a range of policies. Strengthening community wellbeing and cohesion is supported through proposed policies, such as CS12 Sustainable Neighbourhoods, which seeks to tackle deprivation, reduce social and economic inequalities and improve community cohesion through regeneration.

The Core Strategy is legally required to be subjected to a Sustainability Appraisal under the Planning and Compulsory Purchase Act 2004. The Sustainability Appraisal is an essential tool to ensure the principles of sustainable development are inherent throughout the preparation of the Core Strategy. The Sustainability Appraisal assesses the document against a series of Sustainability Objectives, which includes assessing the Core Strategy's performance 'to promote community spirit and cohesion and to provide opportunities for community involvement across all sectors of society (Sustainability Objective 5). The Sustainability Appraisal identifies that the Proposed Submission Core Strategy overall performs well in achieving Sustainability Objective 5, indicating that the Core Strategy has the potential to have a positive impact on community cohesion.

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

## 6. Consideration of Existing Information (Step 2)

6.1 A range of national, regional and local data has been analysed and considered in determining the policy direction of the Core Strategy. This section identifies the main data, information and research which has informed the production of the Blackpool Core Strategy.

### Data, Information and Research

6.2 Local Plans (which include the Core Strategy) are required to be based on adequate and up-to-date evidence about the economic, social and environmental characteristics and prospects of the area. A range of documents form the Local Plan Evidence Base, covering a variety of topics. Figure 4 provides an overview of the key documents forming part of the Blackpool Evidence Base, which are available to view online on the Council’s website ([www.blackpool.gov.uk/corestrategy](http://www.blackpool.gov.uk/corestrategy)). Throughout the preparation of the Core Strategy, the Evidence Base is regularly updated and additional evidence based documents prepared to inform the development of policies.

**Figure 4: Local Plan Evidence Base Documents**

Year	Evidence Base Document
2014	Blackpool Core Strategy Sustainability Appraisal
2014	Blackpool Core Strategy Habitat Regulations Assessment
2013	Annual Monitoring Report
2013	Duty to Co-operate Fylde Coast Authorities’ Memorandum of Understanding
2014	Duty to Co-operate Statement of Compliance
<b>Sustainable Development</b>	
2010	Blackpool Climate Change and Renewable Energy Study
<b>Housing</b>	
2014	Blackpool Housing Technical Paper

2013	Blackpool Housing Monitoring Report
2013	Blackpool Strategic Housing Land Availability Assessments (reviews are undertaken annually).
2013	Fylde Coast Strategic Housing Market Assessment
2014	Fylde Coast Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (currently underway)
2014	Towards an objective assessment of housing need in Blackpool – Analysis of economic and housing forecasts
<b>Retail</b>	
2011	Fylde Coast Retail Study
<b>Employment and Economic Development</b>	
2014	Employment Technical Paper
2013	Blackpool Employment Land Study
<b>Holiday Accommodation</b>	
2011	Holiday Accommodation Supplementary Planning Document
2009	Fylde Coast Visitor Accommodation Study
<b>Transport</b>	
2011	Local Transport Plan Strategy 2011-2016
<b>South Blackpool</b>	
2011	Marton Moss/ M55 Hub Transport Impact Assessment
2009	Marton Moss Characterisation Study
2009	Marton Moss Background Paper
2009	M55 Hub Habitat Survey (Extended Phase 1 Report)
<b>Environment</b>	
2011	Central Lancashire & Blackpool Outline Water Cycle Study
2009	Blackpool Strategic Flood Risk Assessment
2009	Blackpool Open Space, Sport & Recreation Audit and Position Statement
2008	Blackpool Nature Conservation Statement 2008 (updated in 2012)
<b>Infrastructure</b>	
2014	Infrastructure and Delivery Plan
<b>Viability</b>	
2014	Blackpool Local Plan and Community Infrastructure Levy Viability Study

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

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6.3 A range of publically available data, including ONS Population Projections, Neighbourhood Statistics, and the Indices of Multiple Deprivation, also inform the above evidence based documents and the Core Strategy document.

### **Key findings of consultation and feedback**

6.4 Public consultation at key stages in the development of the Core Strategy is a statutory requirement. To date, public consultation has been undertaken at the Issues and Options stage (2008), Preferred Options stage (May 2010), on the 'Blackpool Core Strategy: The Need for New Homes to 2016' (November 2010) which reviewed the Preferred Option development proposals to meet Blackpool's need for new homes, and at the Revised Preferred Option stage (2012). Responses to the above consultations have been considered and have informed the Proposed Submission version of the Core Strategy. A summary of all responses received in relation to the above consultations are provided in the *Blackpool Core Strategy Statement of Consultation*, which also includes the Councils' response to the representations made (this document is available to view on the Council's website).

6.5 Consultation on the Proposed Submission version of the Core Strategy has yet to take place, at this stage stakeholders will be invited to comment only on the 'soundness' of the plan. Once consultation has been undertaken, the representations received will be considered and changes will be made only where appropriate and necessary to ensure the Core Strategy is considered 'sound'.

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

### 7. Analysing the Impact or Effects on Different Groups (Step 3)

7.1 It is a priority of the Core Strategy to promote community cohesion, support regeneration, and tackle deprivation and inequalities to create cohesive and sustainable communities. It is intended that the policies set out in the Core Strategy will lead to positive outcomes for neighbourhoods and communities in Blackpool. This section seeks to assess the potential impacts or effects of the Blackpool Core Strategy on different groups. Figure 5 sets out the aims of each Core Strategy policy and identifies any potential impacts the policies may have on people with respect to key equality strands and protected characteristics.

7.2 It is considered that in addition to any positive impacts identified for specific groups set out below, there is the potential for such benefits to be experienced by others residents. For example, the Core Strategy policy on quality of design which seeks to create safe and attractive environments will have specific positive impacts for a range of groups but will also have the potential to impact positively on all residents and communities.

Figure 5: Analysing the potential impacts of Core Strategy policies

Core Strategy Policy	Comments
<b>CS1: Strategic Location of Development</b>	This policy provides the overarching spatial strategy of the Core Strategy and guides the strategic locations of development, as such no specific potential negative impacts have been identified for different groups.
<b>Core Policies</b>	
<b>CS2: Housing Provision</b>	This policy identifies the main sources which will provide sufficient lands and opportunities for the development of around 4,200 new dwellings to meet Blackpool's needs between 2012-2027. The policy seeks to deliver a choice of quality homes across the borough for new and existing residents, in line with the Core Strategy's dual focus on regeneration and supporting growth. The policy seeks to provide housing which meets a range of needs during the plan period, and as such has the potential to have a positive effect on different groups by ensuring a range of homes are available in Blackpool to meet a variety of needs.
<b>CS3: Economic Development and Employment</b>	This policy recognises the importance of the visitor economy, but also the need to strengthen economic prosperity by supporting business growth and attracting new investment to provide sustainable jobs in other employment sectors. Sustainable economic development is promoted to support and grow the local economy and meet the employment needs of Blackpool and the wider Fylde Coast Sub-Region.  The policy is also supportive of developing and delivering an effective skills agenda to equip Blackpool's residents with appropriate skills, improve aspirations and opportunities for people to move into work, and retain skilled people in Blackpool. This

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

Core Strategy Policy	Comments
	<p>can be achieved through strong links between schools, colleges and key existing and prospective employers. This has the potential to improve the skills and job opportunities for all residents, but may also have a direct positive implication for young people who are currently in education to improve their skills and access to a wider range of jobs in Blackpool.</p>
<p><b>CS4: Retail and Other Town Centre Uses</b></p>	<p>This policy seeks to strengthen Blackpool Town Centre’s role as the sub regional centre for retail on the Fylde Coast. This policy will help to safeguard and improve the vitality and viability of Blackpool Town Centre and to provide a high quality retail offer for use by residents and visitors. By re-establishing the town centre as the first choice shopping destination for the Fylde Coast this has the potential to provide residents access to a wide retail offer within the town centre. The policy also supports local and district centres which can provide essential services for residents with limited mobility.</p>
<p><b>CS5: Connectivity</b></p>	<p>This policy aims to assist in developing a more sustainable, integrated and efficient transport network, which is vital for Blackpool’s social, economic and environmental wellbeing.</p> <p>The promotion of walking, cycling and the use of public transport can have positive impacts on the health and wellbeing of residents by potentially reducing air pollution and promoting more active lifestyles. An efficient public transport network is particularly important for residents with limited mobility or with limited or no access to a private vehicle, such as low-income households. This policy therefore has the potential to have a specific positive impact for residents and visitors by improving connectivity and accessibility.</p>
<p><b>CS6: Green Infrastructure</b></p>	<p>This policy supports the protection of the borough's open space and green infrastructure. This will have a positive impact on all residents and visitors to the borough's open spaces, and will provide opportunities for residents to improve their health and wellbeing by accessing open space and utilising sport and recreation facilities. Residents will benefit from improved areas of green infrastructure, including the enhancement and protection of biodiversity.</p> <p>This policy requires new development to incorporate new or enhance existing green infrastructure, to ensure developments contribute to providing an enhanced network of accessible green infrastructure which will help to improve the health and wellbeing of the people who live and work in Blackpool. The supporting text to the policy also refers to updating SPG11: ‘Open Space for New Residential Development’, this will ensure appropriate onsite provision is made for open space and children’s play space, which has the potential to have a positive impact on young people’s health and wellbeing by improving access to recreational spaces and facilities.</p>
<p><b>CS7: Quality of</b></p>	<p>This policy identifies that good quality design is central to the creation of attractive, successful and sustainable places. The policy requires that new development in</p>



# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

Core Strategy Policy	Comments
<b>Design</b>	<p>Blackpool is well designed and takes account of the character and appearance of the local area. A key element of the policy is creating spaces that are well designed and safe for all residents and visitors. Measures to minimise opportunities for antisocial behaviour and criminal behaviour are supported to create spaces and development which ensures people feel safe and secure.</p> <p>Reducing the fear of crime and creating safe and secure environments is particularly important for residents who may feel vulnerable in public and private spaces, such as the elderly, but also residents who may be discriminated against because of their sex, sexual orientation, disability, religion, belief, or race. To support community cohesion it is crucial that new developments therefore contribute towards creating well-designed and safe environments for use by all residents, as supported by Policy CS7: <i>Quality of Design</i> of the Proposed Submission edition of the Core Strategy.</p>
<b>CS8: Heritage</b>	<p>The focus of Policy CS8: <i>Heritage</i> is to support development which respects and draws inspiration from Blackpool’s built, social and cultural heritage, and which complements its rich history and also widens its appeal to residents and visitors. Therefore, this policy seeks to ensure Blackpool’s heritage is maintained and enhanced so that current and future residents can benefit from the positive contribution this has on the built environment and also the social and cultural heritage of the town.</p>
<b>CS9: Water Management</b>	<p>The focus of policy CS9: <i>Water Management</i> seeks to ensure all new development minimises flood risks and supports the retrofitting of sustainable drainage systems.</p> <p>Some vulnerable groups, such as some elderly and disabled residents, may be at a greater risk during potential flood events, therefore requirements for new developments to minimise flood risk will have a positive impact on such residents and on communities as a whole by mitigating the impacts of climate change.</p>
<b>CS10: Sustainable Design and Renewable and Low Carbon Energy</b>	<p>Policy CS10: <i>Sustainable Design and Renewable and Low Carbon Energy</i> seeks to promote sustainable design measures and requires new buildings to incorporate energy efficiency measures to improve the resilience of communities, reduce the effects of rising fuel costs, improve health and well-being and create more desirable homes. The policy also seeks to provide a framework to mitigate the effects of climate change and support energy efficiency through the promotion of decentralised, renewable and low carbon energy supply to be incorporated in new developments.</p> <p>Energy efficiency measures and requirements for passive design have the potential to impact positively on the quality of life for all residents. Such requirements have the potential to reduce energy bills, which would have a specific positive impact on low-income households and vulnerable groups where fuel poverty may be an issue and will also reduce reliance on fossil fuels which can be a source of pollution.</p> <p>Vulnerable groups, such as some elderly and disabled residents, may be less able to</p>

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

Core Strategy Policy	Comments
	<p>cope with extreme weather conditions (i.e. prolonged periods of cold or hot weather), therefore supporting the creation of responsive and well-designed living environments may have a positive impact on the health and wellbeing of such residents and the occupants of new developments.</p>
<p><b>CS11: Planning Obligations</b></p>	<p>Planning obligations are a mechanism to ensure measures are secured in new development to meet needs arising for additional infrastructure or improved community service and facilities, so that the development does not have a detrimental effect on local amenity, infrastructure capacity or the quality of the environment.</p> <p>This policy requires that where existing infrastructure, services and amenities are not sufficient for a proposed development, planning contributions will be sought to prevent detrimental impacts on facilities and the environment. Therefore, this policy ensures that development contributes to achieving sustainable communities where appropriate services and facilities are provided to meet the needs of residents.</p>
<p><b>Strengthening Community Wellbeing</b></p>	
<p><b>CS12: Sustainable Neighbourhoods</b></p>	<p>This policy seeks to focus neighbourhood regeneration and improvement on a number of priority neighbourhoods within the Inner Area and outer estate areas. The overall aim of the policy is to help to deliver sustainable communities to secure a better quality of life for residents. The policy supports development which provides high quality housing and community facilities, contributes to an efficient, multi-modal transport network, and creates a healthy, safe, secure and attractive environment and public realm, which promotes local pride and a sense of place.</p> <p>This policy has the potential to have a positive impact on different groups, particularly through the support for high quality community facilities, which can include health and education provision, community centres and places of worship, and also support for development which creates a healthy, safe, secure and attractive environments for all residents.</p> <p>Overall, improvements to the identified priority neighbourhoods will help to improve the health and wellbeing of residents, improve access to community facilities, and reduce social inequalities across Blackpool and will support community cohesion.</p>
<p><b>CS13: Housing Mix, Density and Standards</b></p>	<p>A mix of house types and sizes is an essential component of creating successful residential environments. A community with a good housing mix can be home to people of different ages, economic status and lifestyles. This policy seeks to ensure new development provides an appropriate mix of well-designed housing that provides a balanced supply supporting sustainable neighbourhoods and which meets the needs of a diverse range of residents and communities. No specific potential negative impacts have been identified for different groups.</p>
<p><b>CS14: Affordable</b></p>	<p>This policy seeks to provide an adequate supply of good quality affordable housing</p>

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

Core Strategy Policy	Comments
<b>Housing</b>	<p>across the borough, providing a choice of size, type and tenures that appeal to a wider range of residents to help create attractive, sustainable and mixed income communities.</p> <p>The provision of affordable housing has the potential to have a specific positive impact for lower income households by providing homes with mix of tenure types (such as social rented and intermediate affordable housing for either sale or rent).</p>
<b>CS15: Health and Education</b>	<p>Access to quality health and education facilities is integral to raising educational achievement and improving the health and wellbeing of communities, this policy therefore supports proposals which complement existing health care facilities (including seeking contributions towards the provision of health facilities) and proposals which enable the provision of high quality new and improved educational facilities.</p> <p>The policy is intended to benefit all Blackpool residents, however there may be potential positive benefits of policy <i>CS15: Health and Education</i> specifically for young people through the improved access to educational facilities, and to residents requiring specific health services. The encouragement of active lifestyles has the potential to improve the health and wellbeing of all residents.</p>
<b>CS16: Traveller Sites</b>	<p>This policy is intended to guide the location of sites and determine planning applications for Gypsy and Travellers, and Travelling Showpeople to ensure that where needs are identified there is a policy framework in place to accommodate additional pitch provision, this policy will therefore could have a potential positive impact for Gypsy and Travellers and Travelling Showpeople.</p>
<b><i>Regenerating Blackpool Town Centre and Resort Core</i></b>	
<b>CS17: Blackpool Town Centre</b>	<p>This policy will help to protect the vitality and viability of Blackpool Town Centre and maintain a diverse retail, cultural and business offer. By re-establishing the town centre as the first choice shopping destination for the Fylde Coast this will provide residents with limited mobility access to a wide range of retail and essential services within a well-functioning, diverse and accessible town centre.</p>
<b>CS18: Winter Gardens</b>	<p>This policy supports the refurbishment of the Winter Gardens Grade 2* Listed Building, in order to enhance the appeal and status of the venue. The policy provides support for the Winter Gardens to be re-established as a mid-size, multi-purpose conferencing venue with a national profile, as well as being the main entertainment heart of the town for residents and visitors. No specific potential negative impacts have been identified for different groups.</p>
<b>CS19: Central Business District (Talbot Gateway)</b>	<p>This policy supports the comprehensive redevelopment of the Central Business District (Talbot Gateway) to provide an important anchor to the north of the town centre, providing a welcoming arrival experience, connecting with the wider town centre and complementing its retail offer. No specific potential negative impacts have been</p>

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

Core Strategy Policy	Comments
	identified for different groups.
<b>CS20: Leisure Quarter (Former Central Station Site)</b>	This policy supports the comprehensive redevelopment of the Leisure Quarter site for a major leisure development of national significance. No specific potential negative impacts have been identified for different groups.
<b>CS21: Leisure and Business Tourism</b>	This policy seeks to physically and economically regenerate Blackpool's resort core by strengthening the resort's appeal to attract new audiences year round. No specific potential negative impacts have been identified for different groups.
<b>CS22: Key Resort Gateways</b>	This policy promotes further improvement, remodelling and environmental enhancement of the Central Corridor as a key strategic gateway to Blackpool and attractive point of arrival, including support for proposals for improvement and development to regenerate Central Drive, Lytham Road, Dickson Road and Talbot Road as prominent and attractive gateways to the resort and town centre. Improving the gateways into the town centre and resort will help to create a safe and attractive environment for use by residents and visitors. As such, no specific potential negative impacts have been identified for different groups.
<b>CS23: Managing Holiday Bed Spaces</b>	<p>Holiday accommodation continues to be an integral part of Blackpool's tourism offer and is vital to the resort's visitor economy, as recognised by this policy. Whilst there has been an upturn in resort visitor numbers in recent years, this is not reflected in the number of staying visitors, which has declined significantly. These changes have left Blackpool with too many holiday bed spaces</p> <p>To reduce the number of bed spaces, Policy CS23: Managing Holiday Bed Spaces allows more hotels and guest houses to change to residential use than before, encouraging a better balance of quality homes and guest houses. In order to successfully manage this reduction, and retain a suitable level of holiday accommodation in sustainable locations with easy access to the resort facilities and key transport routes, restrictions on change of use will continue to apply to properties located within the main holiday accommodation areas. No specific potential negative impacts have been identified for different groups.</p>
<b><i>Enabling South Blackpool Growth and Enhancement</i></b>	
<b>CS24: South Blackpool Employment Growth</b>	This policy provides support for proposals for major new business/industrial development at sustainable locations in South Blackpool to support sub-regional economic growth. This policy therefore has the potential to improve the employment opportunities in the borough for residents, and as such no specific potential negative impacts have been identified for different groups.
<b>CS25: South Blackpool Housing</b>	This policy seeks to provide quality housing of a type and mix that complements rather than competes with the form of housing being delivered in the inner areas. As such, no

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

Core Strategy Policy	Comments
<b>Growth</b>	specific potential negative impacts have been identified for different groups.
<b>CS26: Marton Moss</b>	This policy identifies that the character of the remaining lands at Marton Moss is integral to the local distinctiveness of Blackpool and as such is valued by the local community. This policy promotes a neighbourhood planning approach for this area which supports the retention and enhancement of the distinctive character, whilst identifying in what circumstances development may be acceptable. Therefore, no potential negative implications have been identified for different groups, however the policy may have a positive effect on community cohesion in the Marton Moss area.
<b>CS27: South Blackpool Transport and Connectivity</b>	This policy is supportive of development proposals which seek to optimise connectivity between homes, jobs, and supporting community facilities in South Blackpool, and identifies the need for a comprehensive public transport, pedestrian and cycle improvement strategy. Therefore, no specific potential negative impacts on different groups have been identified. The policy may however have a positive impact for residents with limited mobility by improving connectivity between homes, jobs and community facilities in South Blackpool.

7.3 From this assessment, it is possible to identify the key issues which are relevant and have the potential to have a positive impact on different groups and residents in Blackpool:

- Providing a mix of house types and sizes and ensuring accessibility to housing for all groups, including the provision of affordable housing (*Core Strategy policies CS2 Housing Provision; CS12 Sustainable Neighbourhoods; CS13 Housing Mix, Density and Standards; CS14 Affordable Housing; and CS25 South Blackpool Housing Growth*)
- The needs of all groups to access employment and training (*Core Strategy policies CS3 Economic Development and Employment; CS15 Health and Education; CS19 Central Business District; and CS24 South Blackpool Employment Growth*)
- The provision of safe and accessible public realm areas to reduce crime and the fear of crime (*Core*

*Strategy policies CS7 Quality of Design and CS12 Sustainable Neighbourhoods).*

- The provision of good quality, safe and accessible green infrastructure and children’s play facilities (*Core Strategy policy CS6 Green Infrastructure*)
- Supporting neighbourhood regeneration in deprived areas of the borough to reduce social inequalities and to support sustainable and cohesive communities (*Core Strategy policy CS12 Sustainable Neighbourhoods*).
- The provision of an accessible, safe and efficient public transport network (*Core Strategy policies CS5 Connectivity and CS27 South Blackpool Transport and Connectivity*).
- The provision of community facilities, which could include schools, health facilities and places of worship (*CS12 Sustainable Neighbourhoods, CS15*



# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

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*Health and Education, and CS11 Planning  
Obligations)*

- Adapting to and mitigating the impacts of climate change to improve the resilience of neighbourhoods and communities (*Core Strategy policy CS9 Water Management and CS10 Sustainable Design and Renewable and Low Carbon Energy*).

7.4 Figure 6 provides a summary of the key potential impacts on the nine Protected Characteristics based on the assessment of Core Strategy policies provided in figure 5.

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

Figure 6: Summary of the potential impacts or effects on the Protected Characteristics

Protected Characteristic	Summary of Key Potential Impacts
<b>Age</b>	No overall negative impacts of the Core Strategy policies have been identified associated with age. A number of policies do have the potential to have a positive impact on residents of different age ranges by ensuring an appropriate range and mix of housing is available in Blackpool to meet a variety of needs, such as <i>CS13: Housing Mix, Density and Standards</i> and <i>CS14: Affordable Housing</i> . Policy <i>CS6: Green Infrastructure</i> may also have a potential positive impact on young people by supporting the provision of play facilities in new developments.
<b>Disability</b>	No overall negative impacts of the policies have been identified on the grounds of disability. Policies such as <i>CS12: Sustainable Neighbourhoods</i> ; <i>CS2: Housing Provision</i> ; <i>CS13: Housing Mix, Density and Standards</i> ; <i>CS5: Connectivity</i> ; and <i>CS7: Quality of Design</i> have the potential to have a specific positive effect on this Protected Characteristic by providing accessible community facilities and an efficient transport network which will facilitate access to services, housing, and employment.
<b>Gender Reassignment</b>	No overall negative impacts of the Core Strategy policies have been identified associated with gender reassignment. It is recognised that this group may experience issues relating to safety in public spaces and neighbourhoods and may face hate crime, abuse and be fearful for their personal safety, therefore policies such as <i>CS7: Quality of Design</i> and <i>CS12: Sustainable Neighbourhoods</i> have the potential to have a positive impact on this group by requiring new development to provide spaces that are well-designed, safe and secure.
<b>Race</b>	No overall negative impacts of the Core Strategy policies have been identified associated with race. In respect of Gypsy and Travellers, policy <i>CS16: Traveller Sites</i> has the potential to have a positive impact by providing criteria by which to identify sites, where a need is identified, to ensure fair and equal treatment for Gypsy and Travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.
<b>Religion or belief</b>	No overall negative impacts of the Core Strategy policies have been identified associated with religion or belief. There is the potential for positive impacts to arise from the Core Strategy through policies such as <i>CS12: Sustainable Neighbourhoods</i> which supports development and investment which provides high quality community facilities accessible to all members of the community, which can include places of worship.

## Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

<b>Sex</b>	No overall negative impacts of the Core Strategy policies have been identified associated with sex.
<b>Sexual Orientation</b>	<p>No overall negative impacts of the Core Strategy policies have been identified associated with sexual orientation.</p> <p>It is also recognised that this group may experience issues relating to safety in public spaces and neighbourhoods and may face hate crime, abuse and be fearful for their personal safety, therefore policies such as <i>CS7: Quality of Design</i> and <i>CS12: Sustainable Neighbourhoods</i> have the potential to have a positive impact on this group by requiring new development to provide spaces that are well-designed, safe and secure.</p>
<b>Marriage and Civil Partnership</b>	No overall negative impacts of the Core Strategy policies have been identified associated with marriage and civil partnership.
<b>Pregnancy and Maternity</b>	No overall negative impacts of the policies have been identified associated with Pregnancy and Maternity.

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

1. *What do you know about how the proposals could affect community cohesion?*

It is a priority of the Core Strategy to strengthen community wellbeing, support neighbourhood regeneration and tackle deprivation and inequalities – therefore achieving community cohesion and creating sustainable communities is at the heart of the Core Strategy.

As discussed previously, the Proposed Submission Core Strategy has been independently assessed with regards to a series of Sustainability Objectives, with the document performing well in relation to promoting community spirit and cohesion and providing opportunities for community involvement across all sectors of society.

The Proposed Submission Core Strategy therefore has the potential to have positive impact on community cohesion across Blackpool.

2. *Is there any evidence of higher or lower take-up by any group or community, and if so, how is this explained?*

The policies of the Core Strategy determine the future focus of physical development and change in Blackpool for the next 15 years and in these terms impacts and affects all the population. The broad strategic nature of many of the policies means that whilst their aims may be generally focussed on promoting a more sustainable Blackpool, it does not readily lend itself to the identification of higher or lower take-up by any group or community.

A key principle of the Core Strategy is that it is only through the fundamental physical change and restructuring of Blackpool’s town centre, resort core and inner areas that the economic, social, health and wider consequences of Blackpool’s past decline will

be addressed. It is therefore the strategy as a whole, rather than its specific policies which will impact and address problems of disadvantage.

3. *Do any rules or requirements prevent any groups or communities from using or accessing the service?*

No, the Core Strategy is a public document and will be made available to view online and at a range of accessible deposit points across the borough.

4. *Does the way a service is delivered/ or the policy create any additional barriers for any groups of disabled people?*

In terms of consultation, hard copies of the Proposed Submission Core Strategy will be made available at a number of accessible deposit points (such as the Town Hall and local libraries across the borough) and will also be made available to view online. Consultation notifications are also sent to a wide range of individuals, groups and organisations to invite comments on the proposed policies.

A Consultation Strategy has been prepared for the Core Strategy which is available to view on the Council’s website and provides details on the process that has and will be followed when preparing and undertaking consultation on the document. It also outlines who we have and will consult and the methods used.

5. *Are any of these limitations or differences ‘substantial’ and likely to amount to unlawful discrimination?*

Yes		No	✓
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# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

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*If yes, please explain (referring to relevant legislation) in the box below*

Not applicable

*If no, do they amount to a differential impact, which should be addressed?*

Yes		No	✓
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*If yes, please give details below.*

Not applicable



# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

## 8. Dealing with Adverse or Unlawful Impact (Step 4)

1. *What can be done to improve the policy, service, function or any proposals in order to reduce or remove any adverse impact or effects identified?*

Public consultation is a key part of the plan-making process and provides an opportunity for all stakeholders to comment on and influence proposed policies. Through this process stakeholders are able to identify any potential impacts or effects of the proposed policies and to provide comments on how the proposed policies could be improved to reduce, remove or mitigate such effects or impacts.

The Core Strategy has an extensive consultee database who are consulted and notified of consultation at every stage of the process. The Core Strategy is a public document and therefore representations can be received and considered from any individual or group. To date, this has included consultation on the Issues and Option stage in 2008, Preferred Option stage in 2010, Revised Preferred Option Core Strategy in 2012, and soon to be followed by a further stage of consultation at the Proposed Submission stage where comments will be invited on the 'soundness' of the plan.

In addition to the consultation process, the Core Strategy is legally required to be subjected to a Sustainability Appraisal (required under the Planning and Compulsory Act 2004) and Habitat Regulations Assessment (required under the Habitats Directive (92/43/EEC)) to assess the plans adherence to sustainable development principles and assessing the potential for the plans impact on Natura 2000 sites (including protected habitat/species). Both assessments have been undertaken for the Proposed Submission Core Strategy with the recommendations of these studies considered and incorporated in the document where appropriate.

If any adverse impacts or effects are identified through either public consultation or independent

assessments, further amendments can be made to the policies to mitigate, reduce or remove these impacts. Furthermore, following the adoption of the Core Strategy, should any adverse impacts be identified through the monitoring process there is the potential for such issues to be addressed within other documents prepared as part of the Blackpool Local Plan. This could include documents such as the *Site Allocations and Development Management document* (which will set out detailed development management policies to determine planning applications against), Supplementary Planning Documents and Neighbourhood Plans.

2. *What would be needed to be able to do this? Are the resources likely to be available?*

Public consultation is a key part of the plan-making process, therefore resources are likely to be available to undertake such consultation.

3. *What other support or changes would be necessary to carry out these actions?*

No additional support or changes would be required.

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

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## 9. Consultation and Decision (Steps 5 and 6)

1. *What feedback or responses have you received to the findings and possible courses of action? Please give details below.*

As part of the Core Strategy process, it is a statutory requirement to prepare a Consultation Statement which outlines all responses received and the Council's response to these comments. This includes identifying how the Core Strategy will be amended to take account of representations made through the consultation process. Details of the representations received at the different stages of the Core Strategy are available to view on the Council's website.

Further views and comments will be sought on the Proposed Submission Core Strategy. All representations received at this stage will be considered when preparing the Submission version of the Core Strategy. The findings of public consultation therefore influences the content of the Core Strategy and is also reported in the Consultation Statement.

2. *If you have not been able to carry out any consultation, please indicate below how you intend to test out your findings and recommended actions*

Not applicable

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission

## Equality Analysis

### 10. Monitoring and Review (Step 7)

Agreed Action	Monitoring arrangements	Timeframe	Responsibility	Added to Service Plan etc
To undertake regular monitoring of the Core Strategy policies, once adopted, to assess their effectiveness and identify specific implications of the policies	Undertake an Authority Monitoring Report. This will use a series of indicators to assess the effectiveness of the policies once the Core Strategy has been adopted.	Annual	Development Plans and Projects Team, Planning Department.	
As part of any future review of the adopted Core Strategy, where appropriate, engagement with groups and individuals will be undertaken to assess the impact and effectiveness of the Core Strategy policies, in line with the Blackpool Statement of Community Involvement.	Review the policies of the adopted Core Strategy	During the plan period.	Development Plans and Projects Team, Planning Department.	

### 11. Action Planning (Step 8)

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/ Measure	Timeframe	Responsibility	Indicate whether agreed
No adverse impacts identified	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

# Blackpool Local Plan Part 1: Core Strategy - Proposed Submission Equality Analysis

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