

Blackpool Core Strategy Revised Preferred Option Equality Analysis

May 2012

Blackpool Council



Blackpool Core Strategy Revised Preferred Option Equality Analysis

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 Revised Preferred Option Equality Analysis

Department: Planning

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

Title of Policy/ Service Function: Blackpool Core Strategy Revised Preferred Option (Proposals to introduce and replace policy).

Date of Proposals: May 2012

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Blackpool Core Strategy Revised Preferred Option Equality Analysis

1. Purpose

1.1 The Government requires all councils to produce a set of documents collectively known as the Local Plan¹ which sets out the planning strategy and policies for an area. The Core Strategy Development Plan Document (DPD) is the main Local Plan document, and will replace a number of remaining saved policies of the Adopted Blackpool Local Plan (2006).

1.2 The Core Strategy sets out the Council’s draft strategic policies and development proposals to deliver its vision for Blackpool to 2027. Before the Core Strategy can be published there are a number of stages which we must follow (figure 1). Each stage represents an opportunity for the community and other stakeholders to be involved in choosing the right planning policies for Blackpool.

Submission document will be prepared and comments invited on the ‘soundness’² of the document. A Submission document will then be prepared which will 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



1.3 The Blackpool Core Strategy is currently at the Revised Preferred Option stage and will be subject to public consultation. After considering all comments received on the Revised Preferred Option, a Pre-

¹ National Planning Policy Framework, March 2012

² 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.

Blackpool Core Strategy Revised Preferred Option Equality Analysis

2. Background

2.1 An Equality Impact Assessment (EIA) 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 EIA 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 This Equality Analysis, therefore, updates the previous EIA to reflect and document how equality considerations have influenced the plan-making process in preparing the Core Strategy. This will also include assessing 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 Core Strategy Revised Preferred Option Equality Analysis

3. The Equality Analysis Approach

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

3.2 Carrying out an EA 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 EA 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 EA. The EA provides an overall assessment of the document as a whole and provides an analysis of potential impacts on a range of groups, including Protected Characteristics, of individual policies proposed in the Core Strategy. The Equality Act 2010 identifies nine Protected Characteristics which should be considered in an EA, these are:

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

- sexual orientation.

3.4 An initial simplified impact assessment of all policies has been undertaken as the first stage of the EA. The EA has then undertaken a Step 1 assessment of the purpose, aims and content of the Revised Preferred Option Core Strategy as a whole. Further information is then provided on each policy, which identifies if there is a potential impact or effect on different communities or groups. Otherwise, the focus of the EA is on the Core Strategy as a whole. Therefore:

- The Step 1 purpose, aims, and potential impact has been 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 Revised Preferred Option Core Strategy.
- 'Step 3' (assessing the impacts or effects on different equality groups and Protected Characteristics) has been undertaken for each policy of the Revised Preferred Option 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 Council's Local Plan. This EA and an

Blackpool Core Strategy Revised Preferred Option Equality Analysis

independent Sustainability Appraisal of the Core Strategy will both 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 Pre-Submission and Submission editions of the Core Strategy, which will then be submitted to Government 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 objectives.
- 'Step 8' (action plan) of the Core Strategy EA 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 Core Strategy.

Blackpool Core Strategy Revised Preferred Option Equality Analysis

4. Initial Impact Assessment

4.1 Figure 2 identifies all policies contained within the Revised Preferred Option Core Strategy and provides an initial impact assessment of the policies in terms of their potential impact (positive or negative) on different groups.

Figure 2: Initial Impact Assessment Checklist

Core Strategy Policies	Equality Impact ³	
	Policy Neutral	Potential Impact
Spatial Strategy		
Policy CS1 Strategic Location of Development	✓	
Core Policies		
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 Climate Change and Energy Efficiency		✓
Policy CS10 Planning Obligations		✓
Strengthening Community Wellbeing		
Policy CS11 Sustainable Neighbourhoods		✓
Policy CS12 Housing Mix, Density and Standards		✓
Policy CS13 Affordable		✓

Housing		
Policy CS14 Health and Education		✓
Policy CS15 Gypsy and Travellers, and Travelling Showpeople		✓
Regenerating Blackpool Town Centre and Resort Core		
Policy CS16 Blackpool Town Centre		✓
Policy CS17 Winter Gardens	✓	
Policy CS18 Central Business District (Talbot Gateway)	✓	
Policy CS19 Leisure Quarter (Former Central Station Site)	✓	
Policy CS20 Leisure and Business Tourism	✓	
Policy CS21 Arrival and Movement		✓
Policy CS22 Key Resort Gateways	✓	
Policy CS23 Promenade Holiday Accommodation	✓	
Policy CS24 Off Promenade Holiday Accommodation		✓
Enabling South Blackpool Growth and Enhancement		
Policy CS25 South Blackpool Employment Growth	✓	
Policy CS26 South Blackpool Housing Growth	✓	
Policy CS27 Marton Moss: Safeguarding and Enhancement	✓	
Policy CS28 South Blackpool Transport and Connectivity	✓	
Delivering the Vision		
Monitoring and Implementation Plan	✓	

³ 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.

Blackpool Core Strategy Revised Preferred Option Equality Analysis

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

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 Cores and neighbourhoods in the Inner Area, and to promote supporting growth and enhancement in South Blackpool to help meet wider housing and employment needs.

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

The preparation of a Core Strategy Development Plan Document (DPD) is a requirement of the Planning and Compulsory Act 2004. The aim of the 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 Council's vision.

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

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 and to meet the needs of Blackpool's residents now and in the future.

Blackpool Core Strategy Revised Preferred Option 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 Revised Preferred option 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. Central to strengthening community wellbeing is to ensure communities can function and grow in harmony together rather than in conflict. This is supported through proposed policies, such as CS11 Sustainable Neighbourhoods, which seek 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 (SA) under the Planning and Compulsory Purchase Act 2004. The SA is an essential tool to ensure the principles of sustainable development are inherent throughout the preparation of the Core Strategy. The SA 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 SA identifies that the Blackpool Revised Preferred Option 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 Core Strategy Revised Preferred Option 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 3 provides an overview of the key documents forming part of the Evidence Base, which are available to view online. 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 3: Local Plan Evidence Base Documents

Date	Evidence Base Document
2012	Blackpool Core Strategy Sustainability Appraisal
2012	Blackpool Core Strategy Habitat Regulations Assessment
2011	Annual Monitoring Report
Sustainable Development	
2010	Blackpool Climate Change and Renewable Energy Study
Housing	
2012	Housing Technical Paper
2011	Blackpool Housing Monitoring Report
2008	Blackpool Strategic Housing Land Availability Assessments (reviews are undertaken annually).
2008	Fylde Coast Strategic Housing Market

	Assessment
2007	Lancashire Sub-Regional Gypsy and Traveller Accommodation and Related Services Assessment
Retail	
2011	Fylde Coast Retail Study
Employment and Economic Development	
2012	Employment Technical Paper
2010	Fylde Sub-Region Employment Land Summary Statement
2008	Blackpool Employment Land Review (a review update was undertaken in 2010)
Holiday Accommodation	
2011	Holiday Accommodation Supplementary Planning Document
2009	Fylde Coast Visitor Accommodation Study
Transport	
2011	Local Transport Plan Strategy 2011-2016
South Blackpool	
2011	Marton Moss/ M55 Hub Transport Impact Assessment
2010	M55 Hub Conceptual Masterplan
2009	Marton Moss Characterisation Study
2009	Marton Moss Background Paper
2009	M55 Hub Habitat Survey (Extended Phase 1 Report)
2009	M55 Hub Development Prospectus
Environment	
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)
Documents to be prepared	
Blackpool Core Strategy Infrastructure and Delivery Plan (in preparation)	
Update to the Blackpool Employment Land Review	

Blackpool Core Strategy Revised Preferred Option Equality Analysis

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), and also 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. Responses to the above consultations have been considered and have informed the Revised Preferred Option Core Strategy. A summary of all responses received in relation to the Preferred Option and The Need for New Homes to 2026 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 the view on the Council's website).

6.5 Consultation on the Revised Preferred Option Core Strategy has yet to take place. Once consultation has been undertaken, the representations received will be considered and where appropriate changes will be made to the Core Strategy. Public consultation on the Revised Preferred Option will provide further opportunities for all stakeholders to comment on the content of the document, including the changes made since the Preferred Option document. Further consultation will be undertaken once the Pre-Submission version of the document has been prepared which will invite stakeholders to comment on the 'soundness' of the plan.

Blackpool Core Strategy Revised Preferred Option 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 4 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.

Figure 4: Analysing the potential impacts of Core Strategy policies

Core Strategy Policy	Comments
CS1 Strategic Location of Development	This policy provides the overarching spatial strategy of the Core Strategy and therefore guides the strategic locations of development, as such no specific potential negative impacts have been identified for different groups.
<i>Core Policies</i>	
CS2 Housing Provision	This policy identifies the main sources which will provide sufficient lands and opportunities for the development of around 4,500 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 therefore aims 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.
CS3 Economic Development and Employment	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 Fylde Coast Sub-Region. The policy is also supportive of developing and delivering an effective skills agenda to

Blackpool Core Strategy Revised Preferred Option

Equality Analysis

Core Strategy Policy	Comments
	<p>equip Blackpool’s residents with appropriate skills, improve aspirations and opportunities for people to move into work, and retain skilled people in Blackpool. This 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>CS4 Retail and Other Town Centre Uses</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>CS5 Connectivity</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.</p>
<p>CS6 Green Infrastructure</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</p>

Blackpool Core Strategy Revised Preferred Option Equality Analysis

Core Strategy Policy	Comments
	improving access to recreational spaces and facilities.
CS7 Quality of Design	<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 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 of the Revised Preferred Option Core Strategy.</p>
CS8 Heritage	The focus of Policy CS8 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.
CS9 Energy Efficiency and Climate Change	<p>Policy CS9 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, reducing CO₂ emissions and requiring energy efficiency measures to be incorporated in new developments. The policy seeks to mitigate and address the effects of climate change by ensuring new development minimises flood risk and waste generation, and all provides appropriate remediation and mitigation measures to prevent adverse pollution.</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. Vulnerable groups, such as some elderly residents, may be less able to 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</p>

Blackpool Core Strategy Revised Preferred Option Equality Analysis

Core Strategy Policy	Comments
	<p>positive impact on the health and wellbeing of such residents.</p> <p>Some vulnerable groups may also 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.</p>
<p>CS10 Planning Obligations</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 and 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><i>Strengthening Community Wellbeing</i></p>	
<p>CS11 Sustainable Neighbourhoods</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 and also 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>CS12 Housing Mix, Density and Standards</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</p>

Blackpool Core Strategy Revised Preferred Option Equality Analysis

Core Strategy Policy	Comments
	balanced supply supporting sustainable neighbourhoods and meets the needs of a diverse range of residents and communities. No specific potential negative impacts have been identified for different groups.
CS13 Affordable Housing	<p>This policy seeks to provide an adequate supply of good quality affordable housing 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>
CS14 Health and Education	<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 CS14 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>
CS15 Gypsy and Travellers, and Travelling Showpeople	This policy is intended to guide the location of sites for Gypsy and Travellers, and Travelling Showpeople to ensure that where needs are identified there is a policy framework in place to accommodate pitch provision, this policy will therefore could have a potential positive impact for Gypsy and Travellers and Travelling Showpeople.
<i>Regenerating Blackpool Town Centre and Resort Core</i>	
CS16 Blackpool Town Centre	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.
CS17 Winter Gardens	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

Blackpool Core Strategy Revised Preferred Option Equality Analysis

Core Strategy Policy	Comments
	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.
CS18 Central Business District (Talbot Gateway)	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 identified for different groups.
CS19 Leisure Quarter (Former Central Station Site)	This policy supports the comprehensive redevelopment of the Leisure Quarter site for major leisure development of national significance. No specific potential negative impacts have been identified for different groups.
CS20 Leisure and Business Tourism	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.
CS21 Arrival and Movement	This policy supports the delivery of improvements to enhance the quality of experience on arrival and the quality of movement within the town centre and resort. This policy therefore has the potential to have a specific positive impact for residents and visitors with limited mobility to improve access and to move around the town centre and resort core.
CS22 Key Resort Gateways	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.
CS23 Promenade Holiday Accommodation	This policy recognises the crucial importance of the main promenade holiday accommodation offer which supports Blackpool's significant visitor economy, alongside developing a new promenade residential offer. No specific potential negative implications have been identified for different groups.
CS24 Off Promenade Holiday	This policy recognises the importance of holiday accommodation which is located away from the main Promenade frontage to Blackpool's resort offer, but also reflects the

Blackpool Core Strategy Revised Preferred Option Equality Analysis

Core Strategy Policy	Comments
<p>Accommodation</p>	<p>complex mix of uses and changing character of the holiday areas away from the Promenade, and provides flexibility to reflect a changing holiday market.</p> <p>Alongside public consultation on the Preferred Option Core Strategy, the Council also consulted on a <i>Holiday Accommodation Supplementary Planning Document (SPD)</i>. The SPD provides further information on the Council’s approach to holiday accommodation. Policy R19 of the 2010 Preferred Option Core Strategy (and the Holiday Accommodation SPD) identified the Lord Street area as remaining predominantly in holiday accommodation use, which, against the general downward trend, has developed a niche of ‘gay friendly’ accommodation that has grown alongside a range of more traditional accommodation. From public consultation, there was clear support for the safeguarding of holiday accommodation in the Lord Street area, which continues to be reflected in policy CS24 of the Revised Preferred Option Core Strategy and the adopted Holiday Accommodation SPD.</p> <p>By identifying the Lord Street area as a Main Holiday Accommodation Area, the policy seeks to improve and consolidate the guesthouse accommodation available. The inclusion of the Lord Street area positively recognises its potential and promotes the different focus and character of this area. By concentrating guesthouses to specific areas, the policy aims to improve the overall quality of provision, which will contribute towards uplifting the areas, improving social and economic wellbeing, and creating sustainable and cohesive communities.</p>
<p><i>Enabling South Blackpool Growth and Enhancement</i></p>	
<p>CS25 South Blackpool Employment Growth</p>	<p>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.</p>
<p>CS26 South Blackpool Housing Growth</p>	<p>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 specific potential negative impacts have been identified for different groups.</p>
<p>CS27 Marton Moss</p>	<p>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</p>

Blackpool Core Strategy Revised Preferred Option Equality Analysis

Core Strategy Policy	Comments
	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.
CS28 South Blackpool Transport and Connectivity	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, and may 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; CS11 Sustainable Neighbourhoods; CS12 Housing Mix, Density and Standards; CS13 Affordable Housing; and CS26 South Blackpool Housing Growth*)
- The needs of all groups to access employment and training (*Core Strategy policies CS3 Economic Development and Employment; CS14 Health and Education; CS18 Central Business District; and CS25 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 CS11 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 CS11 Sustainable Neighbourhoods*).
- The provision of an accessible, safe and efficient public transport network (*Core Strategy policies CS5 Connectivity; CS21 Arrival and Movement; and South Blackpool Transport and Connectivity*).
- The provision of community facilities, which could include schools, health facilities and places of worship (*CS11 Sustainable Neighbourhoods and CS10 Planning Obligations*)
- Adapting to and mitigating the impacts of climate change to improve the resilience of neighbourhoods and communities (*Core Strategy policy CS9 Energy Efficiency and Climate Change*).

7.4 Figure 5 (below) provides a summary of the key potential impacts on the nine Protected Characteristics based on the assessment of Core Strategy policies provided in figure 4.

Blackpool Core Strategy Revised Preferred Option Equality Analysis

Figure 5: Summary of the potential impacts or effects on the Protected Characteristics

Protected Characteristic	Summary of Key Potential Impacts
Age	No overall negative impacts of the Core Strategy policies have been identified associated with age. A number of policies do, however, 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 CS12 Housing Mix, Density and Standards. Policy CS6 Green Infrastructure may also have a potential positive impact on young people by supporting the provision of play facilities in new developments.
Disability	No overall negative impacts of the policies have been identified on the grounds of disability. Policies such as CS11 Sustainable Neighbourhoods; CS2 Housing Provision; CS12 Housing Mix, Density and Standards; CS5 Connectivity; CS21 Arrival and Movement and CS7 Quality of Design 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.
Gender Reassignment	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 CS7 Quality of Design and CS11 Sustainable Neighbourhoods 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.
Race	No overall negative impacts of the Core Strategy policies have been identified associated with race. In respect of Gypsy and Travellers, and Travelling Showpeople policy CS15 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 travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.
Religion or belief	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 CS11 Sustainable Neighbourhoods which supports development and investment which provides high quality community facilities accessible to all members of the community, which can include places of worship.
Sex	No overall negative impacts of the Core Strategy policies have been identified associated with sex.

Blackpool Core Strategy Revised Preferred Option Equality Analysis

<p>Sexual Orientation</p>	<p>No overall negative impacts of the Core Strategy policies have been identified associated with sexual orientation.</p> <p>Policy CS24 has the potential to have a positive impact by recognising the Lord Street area has developed a niche of ‘gay friendly’ accommodation that has grown alongside a range of more traditional accommodation. By concentrating guesthouses to specific areas, the policy aims to improve the overall quality of provision, which will contribute towards uplifting the areas, improving social and economic wellbeing, and creating sustainable and cohesive communities.</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 CS7 Quality of Design and CS11 Sustainable Neighbourhoods 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>
<p>Marriage and Civil Partnership</p>	<p>No overall negative impacts of the Core Strategy policies have been identified associated with marriage and civil partnership.</p>
<p>Pregnancy and Maternity</p>	<p>No overall negative impacts of the policies have been identified associated with Pregnancy and Maternity.</p>

Blackpool Core Strategy Revised Preferred Option 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 Revised Preferred Option 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 Revised Preferred Option 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 Revised Preferred Option 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 will be followed when preparing and undertaking consultation on the document. It also outlines who we will consult and the methods we will use.

Blackpool Core Strategy Revised Preferred Option Equality Analysis

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

Yes		No	✓
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If yes, please explain (referring to relevant legislation) in the box below

n/a

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.

n/a

Blackpool Core Strategy Revised Preferred Option 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 and further consultation to be undertaken on the Revised Preferred Option Core Strategy in 2012, followed by a further stage of consultation at the Pre-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 Appraisal⁴ and Habitat Regulations Assessment⁵ 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 Revised Preferred Option 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 DPD* (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 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.

⁴ Required under the Planning and Compulsory Act 2004

⁵ Required under the Habitats Directive (92/43/EEC)

Blackpool Core Strategy Revised Preferred Option Equality Analysis

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 Revised Preferred Option Core Strategy. All representations received at this stage will be considered when preparing the Pre-Submission version of the Core Strategy, which will be subject to further consultation. The findings of future public consultation will therefore influence the content of the Core Strategy and will also be 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*

n/a

Blackpool Core Strategy Revised Preferred Option 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	To undertake an Annual 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 Local Development Framework Statement of Community Involvement (2007).	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	n/a	n/a	n/a	n/a	n/a

Date completed: 9th May 2012

Signed:

Blackpool Core Strategy Revised Preferred Option Equality Analysis
