

# Equality Impact Assessment Screening Opinion

Draft Housing in Clusters and Small-Scale  
Residential Development in the Countryside  
Supplementary Planning Document

June 2022



## Introduction

1. It is the Council's duty under the Equality Act 2010 to undertake an Equality Impact Analysis at the time of formulating a decision, drafting a report, designing or amending a policy. This will ensure that the Council is considering and taking positive action where possible to promote access to services for all their communities, including their wider communities. The Equality Impact Assessment Screening Assessment will assess whether there is any impact upon any of the groups with protected characteristics under the Equalities Act, which are listed in the table below. If an adverse impact upon any of these groups is identified, then a full Equalities Impact Assessment will be required.
2. The Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document (SPD) seeks to provide guidance about the following Local Plan policies:
  - Policy SCLP5.4 Housing in Clusters in the Countryside (Suffolk Coastal Local Plan, 2020)
  - Policy WLP8.7 Small Scale Residential Development in the Countryside (Waveney Local Plan, 2019)
3. The document is subdivided into chapters, which are summarised below.

### **Chapter 1 - Introduction**

4. This chapter provides an overview of the Local Plan policy context that informs the Housing in Clusters and Small-Scale Residential Development in the Countryside SPD. It summarises the two Local Plan policies that the SPD relates to: Suffolk Coastal Local Plan policy SCLP5.4 (Housing in Clusters in the Countryside) and Waveney Local Plan policy WLP8.7 (Small-Scale Residential Development in the Countryside).

### **Chapter 2 – Suffolk Coastal Policy SCLP5.4: What is a Cluster?**

5. This chapter explains what is meant by a cluster in Suffolk Coastal Local Plan policy SCLP5.4 (Housing in Clusters in the Countryside). A cluster is a group of closely related houses (at least five) located outside of settlement boundaries, in other words in the Countryside. For the proposal to be applicable it should be located within a cluster. The purpose of this policy is to support a small amount of development in rural locations that do not benefit from the range of services found in defined towns and villages. This is to support the sustainability of

rural areas. Chapter 2 provides guidance about the number of buildings within a cluster, how closely related to each other they should be.

### **Chapter 3 – Waveney Local Plan WLP8.7: What is a Settlement in the Countryside?**

6. This chapter explains what is meant by settlement in the countryside under Waveney Local Plan Policy WLP8.7 (Small-Scale Residential Development in the Countryside). The policy does not specify the number of dwellings within a settlement in the countryside, but states that there should be multiple dwellings that are closely related. An isolated dwelling would not qualify as a settlement in the countryside. The aim of this policy is to allow a limited amount of development in the countryside and so help to ensure the sustainability of rural locations. Chapter 3 provides guidance about how closely related to each other buildings should be.

### **Chapter 4 - Suffolk Coastal Local Plan SCLP5.4 Site Characteristics**

7. This chapter provides more detail about when a site would be classified as part of a cluster and could be suitable for development under the Local Plan policy.

### **Chapter 5 - Waveney District Council Local Plan WLP8.7 Site Characteristics**

8. This chapter provides more detail about when a site would be classified as being part of a settlement in the countryside and could be suitable for development under the Local Plan policy.

### **Chapter 6 - Character and Appearance**

9. This chapter provides guidance about how proposals for cluster developments and settlements in the countryside can be designed and built so as to have an acceptable impact upon the surrounding area. This includes guidance about ensuring that development has an acceptable impact upon the landscape, the design of the proposal and minimising cumulative impact.

### **Chapter 7 - Public Consultation**

10. This chapter provides guidance on public consultation requirements for housing clusters and small-scale residential development in the countryside. Key policy considerations are policy SCLP5.4, which states that proposals should meet local housing need and WLP8.7, which states that there should be demonstrable public support for the proposal.

### Chapter 8 - Other Policies

11. This chapter provides guidance on other policies that may cross over with SCLP5.4 and WLP8.7 in certain situations. Although the Housing in Clusters and Small - Scale Residential Development in the Countryside SPD focuses on the requirements of Suffolk Coastal Local Plan policy SCLP5.4 and Waveney Local Plan policy WLP8.7, the Local Plans should be read as a whole. This means that there are other policies that should be considered when planning and deciding a residential development in the countryside. Of particular relevance other Local Plan policies that may need to be considered, depending on the circumstances, include those which relate to self-build and custom build housing, affordable housing, infill and garden development and former Land Association Settlement Holdings in Newbourne.
12. The Equality Act 2010 lists nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. East Suffolk Council has added a tenth characteristic, socio-economic deprivation, in addition to the nine protected characteristics listed in the legislation. This reflects that pockets of deprivation that exist across East Suffolk.

### Screening of impact on different groups

	<b>Groups</b>	<b>Likely Impact</b> (positive/negative/no impact)	<b>Reason for your decision</b>
a	Age (Includes safeguarding issues)	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will

			therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council’s customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those from different age groups.
b	Disability	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council’s customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those with a disability.
C	Gender reassignment	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents

			will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those who have undergone gender reassignment.
D	Marriage and Civil Partnership	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those who are married or in a civil partnership.
E	Pregnancy and maternity	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents

			will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those who are pregnant or on maternity leave.
F	Race	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those from different racial groups.
G	Religion or Belief	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries

			and in the Council’s customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those from different religions or beliefs.
H	Sex	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council’s customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate in terms of sexual identify.
I	Sexual orientation	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council’s customer



			service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate in terms of sexual orientation.
J	Socio-economic deprivation	No impact.	The Housing in Clusters and Small-Scale Residential Development in the Countryside SPD provides guidance about small scale housing development in the countryside, which is located outside of towns and villages and specifically that which may come forward under policies SCLP5.4 and WLP8.7. It will therefore not discriminate against this group. Consultation documents will be available online, in libraries and in the Council's customer service centres and the Council has offered assistance in its publicity material. The consultation will therefore not discriminate against those who are experiencing social or economic deprivation.

## Consultation and Engagement

There was an initial process of consultation that guided the preparation of the Housing in Clusters and Small Scale Residential Development in the Countryside SPD. The initial consultation was undertaken using online workshops for specific groups and organisations to provide feedback on their experience of using the policies:

- Town and Parish Councils in East Suffolk (31<sup>st</sup> March 2022)
- Agents and developers working in East Suffolk (28<sup>th</sup> March 2022)
- East Suffolk Councillors (9<sup>th</sup> May 2022)

Invitations were sent to all Town and Parish Councils in East Suffolk and agents and developers registered on the East Suffolk Local Plan Mailing List. The number of

representatives was limited to one per Town or Parish Council or one per organisation (agents & developers) to ensure all attending had the opportunity to express their views. Workshops were held via Microsoft Teams.

All East Suffolk Councillors were invited to a workshop session on Monday 9<sup>th</sup> May 2022 (6-8pm) held via Zoom.

The format of each workshop included an overview of each of the policies; the scope and timescales of the SPD followed by an interactive session. The Councillors session outlined the feedback from the earlier workshops and sought further feedback on how the SPD could provide further guidance.

A formal public consultation will take place from 17<sup>th</sup> June to 5<sup>th</sup> August 2022 on the Draft Housing Clusters and Small-Scale Residential Development in the Countryside SPD. This consultation will last a total of seven weeks. An extra week has been added to the duration of the consultation to take account of the latter part of the consultation overlapping with the summer holidays. Consultation letters and emails will be sent to consultees on the Council's planning policy mailing list. A press release will be released covering the consultation. The planning policy mailing list includes Town and Parish Councils, Suffolk County Council, East Suffolk Councillors, neighbouring district Councils including the Broads Authority, developers, agents, landowners, business associations, civic societies, infrastructure providers, and members of the public.

Copies of consultation documents will be available online, and hard copies made available for inspection in libraries and in the Council's customer service centres.

Anyone who is unable to view the consultation documents online, in libraries or in the Customer Service Centres can contact the Planning Policy and Delivery Team, and the publicity material provides contact details and an offer of assistance.

## Presentation in Different Languages

As part of a seven-week period of formal consultation, the document will be published on the Council's website, with hard copies available on request for those unable to access it online. The document may be requested in a different language. When such requests are received the Customer Services Team will be involved with ensuring this request is actioned.

## Proposed Changes

The Council will analyse responses received during the public consultation and will make any appropriate changes as a result of comments received.

## Conclusion

This EQIA screening exercise shows that the Housing Clusters and Small-Scale Residential Development in the Countryside SPD will not negatively impact upon any protected group or those experiencing socio-economic deprivation. Therefore, a full EQIA assessment is not considered necessary.