

# Equality Impact Assessment Screening Report (Version 1)

Plan:MK Evidence Base

Milton Keynes Council

Project Number: 60549479 EqIA

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# Quality information

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# 1. Introduction

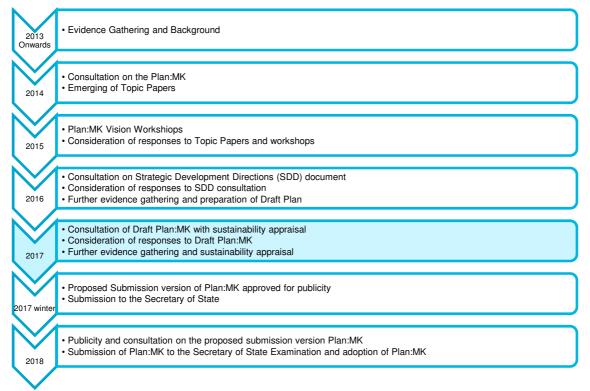
# 1.1 Purpose

This document provides an Equality Impact Assessment (EqIA) screening on the proposed policies contained within the draft Plan:MK. As a public body, Milton Keynes Council (MKC) has a legal duty when creating new plans and policies to pay due regard to the Public Sector Equality Duty (PSED) included within the Equality Act 2010. The PSED aims to eliminate unlawful discrimination, promote equality and cohesion between different groups and advance equality of opportunity. An Equality Impact Assessment (EqIA) screening is a predictive tool which uses available evidence to make an initial assessment of the potential impacts that policies could have on groups with protected characteristics as identified within the Equality Act 2010. The purpose of this screening therefore, is to ensure that MKC is considering the needs of such groups through the implementation of Plan:MK and to understand whether a full EqIA is necessary.

# 1.2 Background to Plan:MK

A Local Plan is a key document allowing local government to have a strategic direction based on the needs of the population to prioritise investment and provision of services. It sets out a vision and framework for the preferred distribution of homes, jobs, retail and leisure together with policies that support sustainable growth. Together with adopted Neighbourhood Plans, a Local Plan is the starting point for the approval of planning applications. MKC is currently in the process of developing the draft Plan:MK as its Local Plan for the period up until 2031.

Figure 1 below shows the stages that have been involved in developing Plan: MK. The document continues to be developed taking into account the findings of the 2017 consultation as well as a number of evidence studies, reviews and assessments. Once finalised the adopted Plan:MK will replace the existing Milton Keynes Local Plan (2005) and polices contained within the Core Strategy (2013).



#### Figure 1 Stages in the Plan:MK preparation process

# 1.3 Approach to screening equality impacts

The approach used for the EqIA screening is as follows:

- A **policy review** sets the context for the assessment, identifying the key national, regional and local policy and legislation relevant to equality;
- A baseline profile provides an overview of the study area using key datasets pertinent to the EqIA such as Census 2011. This identifies groups with protected characteristics, living and working in the area compared with national rates.
- A full review of draft Plan:MK was undertaken alongside a review of responses from public consultation. A set of relevant equality themes were identified relating to each of the policy areas.
- A screening assessment of each policy has been undertaken using the evidence collated in the previous steps to identify if there is likely to be negative or positive impacts as a consequence of the policies included within draft Plan:MK.

# 2. Relevant Policy

# 2.1 Equality Act 2010 and Public Sector Equality Duty

The Equality Act 2010 legally protects people from discrimination both in the workplace and in wider society. It replaces previous anti-discrimination laws which include the Sex Discrimination Act 1975, Race Relations Act 1976 and the Disability Discrimination Act 1995. The Act ensures that individuals with certain 'protected characteristics' are not indirectly or directly discriminated against. The protected characteristics include:

- Age: this refers to persons defined by either a particular age or a range of ages;
- Disability: a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities;
- Gender reassignment: this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- Marriage and civil partnership: marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favourably than married couples;
- Pregnancy and maternity: pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- Race: the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- Religion or belief: religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- Gender: this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
- Socio-economic status: a person's socio-economic status refers to combined economic and sociological measure of a person's work experience and economic and social position in relation to others, based on income, education, and occupation.

All public bodies are also obligated to have regard for the Public Sector Equality Duty (PSED), which is set out in section 149 of the Equality Act. The PSED requires public bodies in exercising their functions to have due regard to the need to:

- Eliminate unlawful discrimination (direct and indirect);
- Advance equality of opportunity; and
- Foster good relations between those with a protected characteristic and all others.

The Equality Act 2010 explains that the second aim (advancing equality of opportunity) involves, in particular, having due regard to the need to: remove or minimise disadvantages affecting people due to their protected characteristics; take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

# 2.2 MKC Equality Policy

The MKC's equality policy<sup>1</sup> sets out a vision to '*Improve the way we engage, think, plan and act to deliver equality and accessibility to everyone, every day*'.

MKC recognizes that equality, diversity and cohesion are key aspects of building a community where its citizens celebrate diversity, people can be competent in the work they do, and services meet the needs of the area and promote general well-being of communities.

The equality policy acknowledges that the Council serves a diverse community that enhances the development of the Borough. The Equality Policy is based on four step approach of actions to achieve equality and cohesion duties and commitments. These are to:

- Engage, Think, Plan and Act on the level of support and services needed;
- Monitor and analyse trends;
- Identify equality challenges; and
- Promote equality of opportunities, and alleviate the main causes of inequality.

# 2.3 Other Equality and Diversity related policies

### 2.3.1 MK Futures 2050 Commission: Making a Great City Greater<sup>2</sup>:

This report sets out a key vision for Milton Keynes for 2050. The two central drivers defining this vision are that Milton Keynes' citizens must have access to the best education and training opportunities in Europe and that Milton Keynes must offer sustainable mobility for all. The Plan outlines a commitment to inclusive growth ".....that creates opportunity for all segments of the population and distributes the dividends of increased prosperity, both in monetary and non-monetary terms, fairly across society."

### 2.3.2 Equality and Diversity in Milton Keynes<sup>3</sup>:

Since 2002, MKC has prepared three editions of good practice guidelines, to improve equality and diversity considerations for the council's staff and its partners. Although this guide was prepared to provide greater understanding of diversity for organisations and professionals that come in contact with children, parents and schools, it has also been used by the council for other purposes.

### 2.3.3 Community Learning MK<sup>4</sup>:

Community Learning MK is the Borough's service provision of learning activities for children, young people and adults. At the heart of this service, and in the context of equality and diversity, there is a well-structured policy to embrace equal opportunities regardless of race, disability, gender, faith, and sexual orientation and to support those who may face unfavourable conditions.

# 2.3.4 NHS Milton Keynes Clinical Commissioning Group (MKCCG), Equality Strategy<sup>5</sup>:

Serving the Milton Keynes population and in charge of GP practices and one hospital within the area, it is the main duty of this body to reduce local health inequalities and be committed to being transparent and engaging with patients, communities, staff and partners as it recognises they all have an important equality dimension.

keynes.gov.uk/assets/attach/5436/What is Equality.pdf

<sup>&</sup>lt;sup>1</sup> Milton Keynes Council Equality Policy, 2016, Available [online]:: <u>https://www.milton-keynes.gov.uk/your-council-and-elections/council-information-and-accounts/equalities/creating-a-fairer-and-more-equal-mk?displaypref=1</u>

 <sup>&</sup>lt;sup>2</sup> MK Futures 2050: Making a Greater City Greater, Available [online]: <u>http://www.mkfutures2050.com/</u>
 <sup>3</sup> Equality and Diversity in Milton Keynes, 2013 Available [online]: <u>https://www.milton-</u>

<sup>&</sup>lt;sup>4</sup> Community Learning MK, August 2014. Available [Online] <u>www.milton-keynes.gov.uk/clmk</u>

<sup>&</sup>lt;sup>5</sup> NHS Milton Keynes CCG Equality Strategy Available [online]: <u>http://www.miltonkeynesccg.nhs.uk/equality-inclusion-and-human-rights/</u>

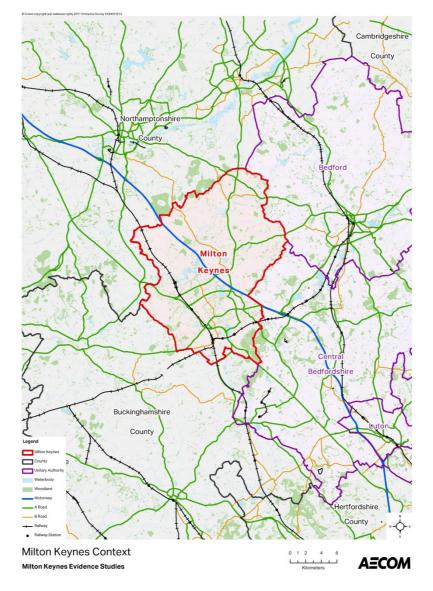
# 3. Baseline Profile

# 3.1 Study Area

The area of study for this EqIA screening is defined as the Borough of Milton Keynes and includes data on the population living and working within the area. The Borough's main settlement is the town of Milton Keynes which accounts for 91% of the population (Census 2011). From its creation of a New Town in 1967 Milton Keynes also absorbed a number of villages and settlements including Bletchley, Newport Pagnell, Stony Stratford and Wolverton.

Figure 2 shows the Borough's strategic location within the region between key economic hubs such as London and Birmingham. It is also part of the Cambridge- MK-Oxford knowledge intense cluster with a continued ambition to compete at a global stage. It also enjoys good connectivity with the rest of country by rail (West Coast Main Line) and road (M1) to the east of the city.

Milton Keynes has one of the fastest growing economies in the UK and highest start-up rates for new businesses. It also has one of the most productive workforces with a large proportion of people commuting in to the town. As a Unitary authority, MKC has responsibility for local public services in the Borough ranging from education and housing to transport and waste management.



#### Figure 2 Milton Keynes within the regional and national context

# 3.2 Baseline Profile

A baseline profile of the population living and working within the study area is necessary for the equality screening in order that an assessment can be made as to the potential level of impact of Plan:MK may have on groups with protected characteristics. The main source of data used in the baseline profiling is Census 2011 data from the Office for National Statistics (ONS). For the purpose of this demographic profile, the 'Borough' refers to Milton Keynes and 'national' level statistics refer to England and Wales.

### 3.2.1 Overall Population

#### 3.2.1.1 Population change

- In the ten years to 2016, Milton Keynes's population rose by 16.4%. This is twice the national growth rate and the sixth fastest growing area in England outside of London<sup>6</sup>. It is estimated that the population of Milton Keynes will reach 308,500 by 2026.
- All age groups are projected to grow, with the fastest growth in the older age groups. The number of older people (Aged 65-79) and elderly people (Aged 80+) are projected to increase from 27,511 in 2011 to 50,000 by 2026.
- Natural change will increase an average of 2,000 people to the population each year until 2026 while net migration will continue to drive population growth over the next three years and gradually fall until 2026.

#### 3.2.1.2 Age structure of population

- Milton Keynes has a younger age profile compared with the national age breakdown. The proportion of those aged under 18 is 25.6% compared with 21.3% nationally (Census, 2011).
- The Borough had a lower percentage of people aged over 65 (11.1%) in the 2011 Census compared with the national rate (16.6%). As mentioned, this age group is likely to experience the highest growth rates over the time period of Plan: MK.

#### 3.2.1.3 Gender

 The Borough has a slightly higher proportion of female residents (50.5%) compared to males (49.5%). A similar trend is observed nationally (Census 2011).

#### 3.2.1.4 Ethnicity

- Milton Keynes has a majority White population (80%), however this is lower than the national figure of 86%. The remaining 20% of the population is composed of minority ethnic groups including 9.2% Asian/Asian British; 6.9% Black/African/Caribbean/ Black British; Mixed/Multiple ethnic groups 3.3%; and other ethnic groups 0.6%. (Census 2011)
- White Irish and Other White account for 6.1% of the population. This is slightly higher than the national rate of 5.4%. (Census 2011)
- Milton Keynes has a larger proportion of African people (5.2%) compared to the national level (1.8%).
- There is a higher proportion of Asian British Indian (3.3%), Chinese (1.1%) and Other Asian (2.5%) compared to the national levels of 2.5%, 0.7%, 1.5%, respectively. On the contrary there is a slightly smaller proportion of Pakistani 1.5% compared to the national at 2.0%. (Census 2011)

#### 3.2.1.5 Nationality and Migration

 The percentage of UK nationals in Milton Keynes is 81.5% compared with 86.6% nationally. (Census 2011)

<sup>&</sup>lt;sup>6</sup> Population and projection estimates (Nomis), Census 2001, 2011 and 2016 Mid-Year Estimates (MYE)

- Milton Keynes has a higher percentage of population from Middle East and Asia, Africa and Europe when compared with national rates. Specifically, population rates are higher for people from Southern Asia, Central and Western Africa and South and Eastern Africa.
- EU nationals have arrived mainly from 2001 member countries (2.2%) and from accession countries (2.5%).
- Of the total National Insurance registrations issued to overseas adults (NINo)<sup>7</sup> entering the UK for the year to March 2017, 0.62% are resident in Milton Keynes. Of these, the top five regions are: EU2 (37%), EU15 (22.7%), EU8 (18.3%), South Asia (9.5%) and Sub-Saharan Africa (5.5%).

#### 3.2.1.6 Marriage and Civil Partnership

 Almost half of the population (48.2%) are married or in a registered same-sex civil partnership comparable to 46.8% nationally. Singles account for 33.4% of the population, 9.6% of the population are divorced, 3.0% are separated and 5.3% widowed (Census 2011).

#### 3.2.1.7 Religion and Belief

The percentage of Milton Keynes residents who stated they had a religion in the 2011 Census was 62.1%. This is largely made up of Christian denomination (85.0%). The remaining 15% are Muslims, Hindus, Buddhist, Sikh and Jewish and others undefined with a further 31.3% of people stating they had no religion.

#### 3.2.1.8 Asylum Seekers and Refugees

 Small numbers of asylum seekers from different countries have arrived in Milton Keynes since the Borough was created. More recently, following current events, MKC in partnership with nonprofit organizations (Red Cross and Refugees Welcome MK) have helped resettle a small number (30) of Syrian refugees up to December 2016. The Borough has pledged to accept 160 more<sup>8</sup>.

#### 3.2.2 Households

- According to Census 2011, the number of households in Milton Keynes was 98,584, an increase of 18.3% (15,225 households) since the 2001 Census. More recent estimates suggest the number of households has continued to increase and as of June 2017, the figure is estimated at 106,569<sup>9</sup>.
- Census 2011 estimated the majority of households are one-person households (25.9%) and twoperson households (33.3%), with fewer larger households (17.5% three-person households, 15.1% four-person households and 8.2% households with five or more residents).
- The level of overcrowding in Milton Keynes has increased between 2001 and 2011 (+2%) from 7.6% to 9.6%. The rise is more noticeable for families (+7.5%) compared to other groups. In 2011, 35% of households in MK had dependent children compared to 29.1% nationally.

#### 3.2.3 Residential Institutions

 Nationally, the number of people living in residential institutions (those establishments providing managed residential accommodation) increased by 7.5% between 2001 and 2011. This increase is more significant in Milton Keynes where the number of people living in communal establishments increased by 24.6% from 2001 to 2011. Most people living in communal establishments were resident in medical and care establishments (Census 2011).

<sup>&</sup>lt;sup>8</sup> The Guardian, March 2017 Available [online]:: <u>https://www.theguardian.com/world/2017/mar/09/we-want-more-syrian-refugees-offers-exceed-official-uk-pledge-of-20000</u>
<sup>9</sup> MK Insight, Available [online]: http://mkinsight.org/housing-and-environment/

#### 3.2.4 Housing

#### 3.2.4.1 Housing Stock

- The housing stock, as of 30 June 2017, was 110,690. Housing completion data from 1981 to 2017 in Milton Keynes shows that there have been between 1001 and 3304 houses built annually across the Borough with an increase in housing stock of 8,573 dwellings between 2006 and 2011 and 5,342 dwellings between 2001 and 2016<sup>10</sup> (forecast data, www.miltonkeynes.gov.uk).
- According to the Land Registry Data the average house price in Milton Keynes in June 2017 is £258,782, with a percentage annual change of 3.88%. As of June 2017, the national average house price was £235,096, with a percentage annual change of 5.13% on 2016 prices. House prices have increased by 52.8% over the ten-year period between 2006 and 2016.
- The ratio of average house price to average salary for Milton Keynes is 8.5 and is comparable to the national figure of 8.8 (Census 2014 data). Median gross annual salaries have increased at a much slower rate than house price values.
- The 2015 Local Government Association "First 100 Days" campaign (link) highlighted that there are 1.7 million households on waiting lists for affordable housing across England and that more than 3.4 million adults between 20 and 34 live with their parents. It is likely that the demand for affordable housing in Milton Keynes will rise as the percentage growth in the private rented sector between 2001 and 2011 is at 259.6% (from 6,579 to 17,066 households). As with much of the South East of England, the private rental sector in Milton Keynes now makes up 17.3% of housing stock, a significant rise from 7.6% in 2001.
- According to the SHMA (2009) report 4% of households found it extremely difficult to manage with the cost of housing, 9% found that housing costs were putting a strain on their budget and 25% saw housing costs as being just manageable. These financial struggles were most significant in the private rental and social rental sector.

#### 3.2.4.2 Housing Needs

- Of the 98,584 households in MK in 2011, 63.8% housing tenures are owner occupied (21.5% owned outright and 42.3% owned with a mortgage or loan) and 36.2% are rented (18.0% social renting and 18.2% private rented); This data is comparable to the data nationally, where 64.3% of households are owned and 35.7% are rented (Census 2011 and Household Survey, SHMA).
- According to a 2015 Freedom of Information request<sup>11</sup>, there are 429 households in Band 1 cases (people with nowhere to live or somewhere to live which is unsuitable for the medical condition of the person) waiting to be housed in Milton Keynes, 317 cases have children involved and 24 are vulnerable wheelchair users. People in Band 1 get housed in an average of 17.33 months. Excluding older people, this time frame increases to 18.47 months.

#### 3.2.5 Employment

- Around 159,300 employees were registered in Milton Keynes according to the Business Register and Employment Survey 2015<sup>12</sup>. The top sectors for employment include wholesale and retail trade, administration, professional, scientific and technical and education.
- Census estimates from 2001 and 2011 show that the working age population in Milton Keynes has not changed significantly over the decade and is slightly higher than the national rate.

https://www.whatdotheyknow.com/request/housing waiting lists

<sup>12</sup> The Business Register and Employment Survey, 2015 revised, October 2017 Available [online]: https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/busi nessregisterandemploymentsurveybresprovisionalresults/provisionalresults2016revisedresults2015

<sup>&</sup>lt;sup>10</sup> Housing Stock, MKC, July 2017 Available [online]: <u>https://www.milton-keynes.gov.uk/your-council-and-</u> elections/statistics/housing-statistics <sup>11</sup> Freedom of Information Request, April 2015. Available [online]:

### 3.2.6 Commuting and Movement

- Census 2011 data showed that 81.1% of households in Milton Keynes have access to a car or van, 43.2% with one vehicle and 37.8% with access to two or more cars or vans.
- One person and lone parent households are less likely to have access to a car or van. One person households without a car or van is 39.4%, with 31.1% of these being one parent households and 58.8% being one person households aged 65 and over.
- In Milton Keynes, 71.7% of workers travel to work by car/van. Of these, 91.1% drive themselves to work (83,392) and 8.9% commute as a car passenger (8,239). In 2008, Milton Keynes residents who also work in Milton Keynes make up 83% of the working age population with around an additional 44,520 workers commuting in from outside the Borough.

### 3.2.7 Disability, Health and Care

- 6.4% of the population of Milton Keynes reported having a disability that significantly affects their day-to-day activities. An additional 7.5% stated that their disability or health issue limited their day-to-day activities a little (Census 2011). Milton Keynes has a higher level of claimants for Disability Living Allowance Higher Mobility Component (HMC) compared with the South East, indicating that the Borough has significant levels of disability which may require a strategic housing response.
- The average life expectancy for people living in Milton Keynes is 80.2 years of age; 78.7 years of age for men and 82.5 years of age for women.
- The life expectancy at birth is increasing in Milton Keynes (but less so for females) and is now 0.5 years shorter for both males and females than national averages. The difference in life expectancy at birth between the most and least deprived 10 percent of the population in Milton Keynes shows a gap of 7.1 years for males and 5.3 years for females. The average number of years a male or female would expect to live in good health in Milton Keynes is 62.5 years for males and 65.4 years for females, these figures are fractionally below the national figures.

### 3.2.8 Deprivation and Disadvantaged Communities

- Milton Keynes is ranked 181 of 326 local authorities in England on the Index of Multiple Deprivation (2015), where 1 is the most deprived. Of the 139 Lower Super Output Areas (LSOAs) in Milton Keynes there are nine which are within the 10% most deprived in England. This is an increase in the number of LSOAs since 2010 when there were seven LSOAs in the 10% most deprived and six in 2007 and five in the 2004 indices.
- Although as a local authority Milton Keynes is less deprived than the England average, 13.9% of its population are living in the 20% most deprived areas of England. Of the 20% most deprived (35,540 people), 9,740 are children aged under 16. Milton Keynes contains some of the poorest areas and worst concentrations of deprivation in the South East outside London, a pattern which continues to deepen, resulting in a pattern of spatial segregation with a band of deprivation running through the middle of MK<sup>13</sup>.
- Nearly half of all social housing is located in the most deprived fifth of neighbourhoods. Low levels of deprivation in Milton Keynes are mainly associated with income, education and living environment domains.
- People in social housing have higher rates of unemployment, poverty and ill health with the main disadvantaged groups being: lone parents, unemployed, children and families living in social housing, people with disabilities and the elderly (without access to a car), and people waiting on the housing register (homeless, in temporary accommodation or in overcrowded dwellings).
- Deprivation is more associated with urban rather than rural living. 57.4% of rural households are not deprived compared to 45.7% of urban households.

<sup>&</sup>lt;sup>13</sup> Milton Keynes Disadvantaged Neighbourhoods, available [online]: <u>https://strategicurbanfutures.com/</u>

# 4. EqIA Screening Methodology

The EqIA screening has reviewed each individual policy and used evidence collated in each of the previous sections to assess whether or not the policy has potential to *differentially* or *disproportionately* impact on each of the groups with protected characteristics. To clarify, the assessment will only identify a positive or negative impact where:

- The impact is expected to be greater for the assessed group than for the population of Milton Keynes as a whole; or
- Where it affects an equality group differently from the rest of the general population because of specific needs or a recognised vulnerability.

The following groups will be assessed in the screening:

- Age (all age groups but particularly children, younger people and older people)
- Disability (all forms of disability recognised under the Equality Act)
- Gender (including male, female and gender reassignment)
- **Pregnancy** and **maternity**
- **Race** (all ethnic groups)
- Religion or belief (all religions and groups)
- Sexual orientation
- Socio-economic status (lower socio-economic groups and deprived areas)

Table 2 outlines the scoring used for the screening assessment and Table 3 contains the outcomes of the EqIA screening assessment for each Plan:MK policy.

#### Table 1 Scoring assessment for EqIA

Potential differential impacts	
Positive	+
Negative	-
Positive and/or negative	+/-
Neutral	0

# 5. Plan:MK EqIA Screening Table

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
Sustainable Development Strategy									
<b>MK1</b> Presumption in favour of sustainable development	0	0	0	0	0	0	0	0	
Development Strategy									
DS1 Settlement hierarchy	0	0	0	0	0	0	0	0	
DS2 Housing strategy	+/-	+/-	+/-	+/-	+/-	0	0	+/-	Regeneration of existing sites can result in positive or negative impacts for existing residents depending on the type of regeneration and area affected. It is recommended that local level EqIA screening should be undertaken for individual regeneration schemes.
DS3 Employment Development Strategy	+	0	0	0	0	0	0	+	New employment sites could provide new location opportunities for existing businesses and attract new ones. The policy states that the Council will encourage training and new skills development so that local residents can benefit from new employment opportunities and as such this policy could particularly benefit young people and low skilled workers.
DS4 Retail and leisure development Strategy	+	0	0	0	+	0	+	0	Potential positive impacts to young people accessing recreation and employment opportunities. Policies associated with improving accessibility could have a potential positive impact on those with mobility issues including some older people, disabled people and parents with pushchairs and/or young children.

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
DS5 Open countryside	0	0	0	0	0	0	0	0	
DS6 Linear parks	0	0	0	0	0	0	0	0	
Strategic Site Allocations									
SD1 Place-Making principles for development	+	+	0	0	+	0	+	+	Place-making principles include creating places and routes that are safe and perceived to be safe; provision of facilities such as shops, health care and opportunities for employment; accessible locations for shops, facilities and public transport and direct safe and pleasant routes for pedestrians and cyclists. This will have potential positive impacts for more vulnerable groups such as younger and older people, people with mobility difficulties, women (as they make more public transport journeys than men) and those who are pregnant or have small children. It will have benefits for those groups who rely on public transport, walking and cycling to get around.
SD2 Central MK - Role and function	+/-	0	+/-	0	0	0	0	+/-	Central MK has pockets with a relatively high proportion of young people (including the YMCA), ethnic groups and people from lower
<b>SD3</b> Central MK - Growth and areas of change	+/-	0	+/-	0	0	0	0	+/-	socio-economic groups (see Figures 3 - 5). Therefore these groups could receive differential positive or negative impacts depending on the type of development and the ways the in which they are affected by development. It is recommended that EqIA screening on individual developments within this area is undertaken to identify potential impacts at the local level.
SD4 Central MK - Connectivity	+	+	0	0	0	0	0	+	Positive impacts for those who rely on walking, cycling or public transport. These groups include younger and older people, women and people from lower socio-economic households.
SD6 Eastern Expansion Area	0	0	0	0	0	0	0	0	
SD7 Western Expansion Area	0	0	+/-	0	0	0	0	0	The Western Expansion Area borders areas with a relatively high level of Asian and other ethnic group residents (See Figure 6). Therefore

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
									these groups could receive differential positive or negative impacts depending on the type of development and the ways the in which they are affected by development. It is recommended that an EqIA be undertaken for any development at this site as well as monitoring of impacts on groups with protected characteristics.
SD8 Strategic Land Allocation	0	0	0	0	0	0	0	0	
SD9 Newton Leys	0	0	0	0	0	0	0	0	
<b>SD11</b> General principles for Strategic Urban Extensions	0	0	0	0	0	0	0	0	
SD12 Delivery of Strategic Urban Extensions	0	0	0	0	0	0	0	0	
<b>SD13</b> South East Milton Keynes Strategic Urban Extension (SUE)	+/-	0	0	0	+/-	0	0	0	The South East SUE borders areas (including Woburn Sands) with a relatively high level of older residents and those with long term limiting health issues (See Figures 7 and 8). Therefore these groups could receive differential positive or negative impacts depending on the type of development and the ways the in which they are affected by development. It is recommended that an EqIA be undertaken for any development at this site as well as monitoring of impacts on groups with protected characteristics.
SD14 Milton Keynes East	+/-	0	0	0	+/-	0	0	0	Milton Keynes East borders areas with relatively high levels of older residents and those with long term limiting health issues (see Figure 9, Appendix A). Therefore these groups could receive differential positive or negative impacts depending on the type of development and the ways the in which they are affected by development. It is recommended that an EqIA be undertaken for any development at this site as well as monitoring of impacts on groups with protected characteristics
SD15 Land at Eaton Leys, Little Brickhill	+/-	0	0	0	+/-	0	0	0	Eaton Leys borders areas with relatively high level of older residents and those with long term limiting health issues (See Figures 9 and 10

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
									Appendix A). Therefore these groups could receive differential positive or negative impacts depending on the type of development and the ways the in which they are affected by development. It is recommended that an EqIA be undertaken for any development at this site as well as monitoring of impacts on groups with protected characteristics.
<b>SD16</b> Strategic Employment Allocation, land south of MK, South Caldecotte	+/-	0	+/-	0	0	0	0	0	South Caldecotte neighbours areas with relatively high areas of young people, people from different ethnic minority groups and people aged over 65. These groups could receive differential positive or negative impacts depending on the type of development and the ways in which they could be affected. However, this is a proposed major employment scheme, including warehousing and as such young people will benefit in particular from job creation in their neighbourhood. It is recommended that an EqIA be undertaken for any development at this site as well as monitoring of impacts on groups with protected characteristics.
<b>SD17</b> Place-making principles for sustainable urban extensions in adjacent local authorities	+/-	0	+/-	0	+/-	0	+/-	+/-	The equality impacts of this policy are unknown as they will be dependent on the location and type of development proposed. Therefore it is recommended that an EqIA screening should be undertaken on all developments proposed as urban extensions in adjacent local authority areas.
SD18 Campbell Park	+/-		+/-					+/-	Campbell Park is located within Central MK which has pockets of relatively high proportion of young people (including the YMCA), ethnic groups and people from lower socio-economic groups residing in the area. Therefore these groups could receive differential positive or negative impacts depending on the type of development and the ways the in which they are affected by development. It recommended that EqIA screening on individual developments within this area are undertaken to identify potential impacts at the local level.
<b>SD19</b> Central Bletchley Urban Design Framework Area	+/-	0	+/-	0	+/-	0	+	+/-	Central Bletchley has pockets of relatively high proportion of young people and older people, ethnic groups, people with disability, people from lower socio-economic groups and is a relatively deprived area.

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
									Therefore these groups could receive differential positive or negative impacts depending on the type of development and the ways the in which they are affected by development. Positive benefits are likely to be realised for some groups with protected characteristics due to development principles around improved pedestrian connectivity and access to Bletchley station. It recommended that EqIA screening on individual developments within this area are undertaken to identify potential impacts at the local level.
SD20 Milton Keynes Rugby Club, Greenleys	+/-								The policy for redevelopment Milton Keynes Rugby Club includes a statement for further investigation for S106 funding to provide new play infrastructure to the east of the site which would be a benefit for children living in the area. However the redevelopment will also involve some loss of some existing urban space and as such care should be taken to ensure that positive impacts are realised.
SD21 The Walnuts, Redhouse Park	+/-				+/-				The Walnuts, Redhouse Park borders areas with relatively high level of older residents and those with long term limiting health issues. Therefore these groups could receive differential positive or negative impacts depending on the type of development and the ways the in which they are affected by development. It is recommended that EqIA screening on individual developments at this site are undertaken to identify potential impacts at the local level.
Economy and Retail									
<b>ER1</b> Employment sites within the Borough of Milton Keynes	0	0	0	0	0	0	0	0	
<b>ER2</b> Protection of existing employment land and Premises	0	0	0	0	0	0	0	0	
ER3 Retailing on employment land	0	0	0	0	0	0	0	0	
ER4 Home based business	0	+	0	0	+	0	+	0	The policy could advance equality for groups for which working from

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
									home could provide self-employment or widen employment opportunities. This could include women particularly those with children and disabled people.
<b>ER5</b> Protection of small business units	+	0	+	0	0	0	0	0	Ethnic owned businesses are more likely to be small enterprises requiring small units. Young people are more likely to be involved in start-ups and therefore this policy has potential positive impacts for these groups.
ER6 Sites for bad neighbour uses	+	0	0	0	0	0	0	0	Children are more susceptible to health issues from poor air quality. Older people are more likely to be home during the day and be affected from noise and air issues. Policies to restrict bad neighbour uses from residential areas could therefore have a potential positive impact on these groups.
ER8 Places of worship on employment sites	0	0	0	-	0	0	0	0	Planning permission is being based on day of the week of worship. There may be issues with discrimination against certain faith groups if their main day of worship or activities fall during weekdays.
<b>ER9</b> Employment uses and the rural economy	0	0	0	0	0	0	0	0	
<b>ER10</b> Character and function of the shopping hierarchy	0	0	0	0	0	0	0	0	
<b>ER11</b> Assessing edge of centre and out of centre proposals	+	+	0	0	+	0	0	+	Proposals with choice of public and sustainable transport options will provide positive impacts for those who rely on these modes of travel. Accessibility for people with disabilities will provide positive impacts for this group.
<b>ER12</b> Protection of local shops, post offices, banks and public houses	+/-	+/-	+/-	0	+/-	+/-	+/-	+/-	Positive or negative impact on groups with protected characteristics if facilities depending on type of facility and outcome of planning application.
ER13 New Shops in the rural area	+	+	0	0	0	0	0	+	Retail facilities within local villages will provide positive impacts for those without access to a car or who rely on public transport and can include younger and older people, women and people from lower socio-

Policy area and draft policies		Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	
										economic groups.
ER14 Non-retail uses in local centres		0	0	0	0	0	0	0	0	
ER15 New local centres		+	+	0	0	0	0	0	+	Local centre provide facilities for those without access to a car or who rely on public transport. This has potential positive impacts for younger and older people, women and lower socio-economic groups.
ER16 Car-related retail uses		0	0	0	0	0	0	0	0	
ER17 Hotel and visitor accommodation		0	0	0	0	0	0	0	0	
<b>ER18</b> Tourism, visitor and cultural Destinations		0	0	0	0	0	0	0	0	
ER19 Non-retail uses on ground floors in town centres		0	0	0	0	0	0	0	0	
Homes and Neighbourhoods										
HN1 Housing mix and density	0		0	0	0	0	0	0	0	
HN2 Affordable housing	+/	-	0	0	0	0	0	0	+/-	The provision of affordable housing should have positive impacts for younger people and those from lower socio-economic groups. However, it is important that individual EqIAs are undertaken at the development level to ensure that the affordable housing benefits are being realised and that levels of rent are 'affordable'.
HN3 Supported and specialist housing	+	-	0	0	0	+	0	0	0	Benefits for older people and people with disabilities due to provision of supported and specialist housing. However the policy does not state any provision for housing needs of other groups that need support such as young people who may vulnerable and need assistance.
HN4 Amenity, accessibility and adaptability of homes	0		0	0	0	+	0	0	0	Positive impacts for disabled people due to increase in accessible and adaptable homes.

Policy area and draft policies		DD ·	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
<b>HN5</b> Self-build and custom housebuilding	+		0	0	0	0	0	0	+	This proposal could have potential positive benefits for younger and older people and those from lower socio-economic groups. However, it is important this policy is combined with additional policies such as DN3 to ensure quality and safety standards.
HN6 Housing for temporary accommodation	+		0	0	0	0	0	0	+	Would provide potential positive impacts for homeless people enabling them to live independently.
HN7 Houses in Multiple Occupation	+/-		0	+/-	0	0	0	0	+/-	This policy recognises the need for more HiMOs, providing they do not result in an imbalance of this type of accommodation. This would provide more affordable accommodation for younger people and those in lower socio-economic groups, as well as providing options for an increasing student population. Over 60% of residents of HiMOs are also from BAME communities and such people from these groups would likely to receive positive or negative impacts depending on the outcome and approval of applications.
HN8 Student accommodation	+		0	0	0	0	0	0	0	
HN9 Loss and conversion of existing residential properties	0		0	0	0	0	0	0	0	
HN10 Rural exception sites	0		0	0	0	0	0	0	0	
HN11 Gypsies and travellers	0	-	+/-	0	0	0	0	0	0	Extensions to existing sites and new traveller site allocations will provide positive impacts for the gypsy and traveller community.
HN12 Travelling Showpeople	0		0	0	0	0	0	0	0	
Transport and Connectivity										

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
CT1 Sustainable transport network	+	+	0	0	0	0	0	+	The provision and promotion of a sustainable transport network will provide particular benefits to those who already rely on sustainable transport and may include younger and older people, women and those from lower socio-economic groups.
CT2 Movement and access	+	+	0	0	+	0	+	+	Promoting sustainability, accessibility and low carbon transport network will have a positive impact on those who rely on walking, cycling and public transport and those who have restricted mobility.
CT3 Walking and cycling	+	+	0	0	+/-	0	+	+	Provides positive impacts for those who rely on sustainable or public transport including younger and older people, women and lower socio- economic groups. It is important that access to walking and cycling routes are considered for people with disabilities and as such it is recommended that Plan: MK mentions accessible facilities for pedestrian and cycling routes.
CT4 Crossover on Redways	0	0	0	0	0	0	0	0	
CT5 Public transport	+	+	0	0	+/-	0	+/-	+	Positive impacts for users of public transport including younger and older people, women and people from lower socio-economic groups. It is recommended that text is included outlining accessibility measures at bus stops for people with disabilities/mobility issues
CT6 Low emission vehicles	+	0	0	0	0	0	0	0	Children are more likely to be negatively affected by emissions from vehicles and as such policies to encourage, promote and provide for low emissions vehicles will have a potential positive impact on this group
CT7 Freight	0	0	0	0	0	0	0	0	
CT8 Grid road network	0	0	0	0	0	0	0	0	
CT9 Digital communications	0	0	0	0	0	0	0	0	
CT10 Parking provision	0	0	0	0	0	0	0	0	

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations		
Education and Health											
<b>EH1</b> Provision of new schools – planning considerations	+	0	0	0	0	0	0	0			
<b>EH2</b> Provision of new schools – site size and location	+	0	0	0	0	0	0	0	Additional schools and expansion of schools provides extra school places and therefore positive impacts for children		
<b>EH3</b> Reserve sites to enable future school expansion	+	0	0	0	0	0	0	0			
EH4 Further and higher education provision	+	0	0	0	0	0	0	0	Provides benefits for young people		
EH5 Health facilities	+	0	0	0	+	0	+	0	Proposals for new health facilities where there is local need and the protection existing facilities should have a particular positive impact on those people who use health facilities more frequently.		
<b>EH6</b> Delivery of health facilities in new development	0	0	0	0	0	0	0	0			
EH7 Promoting healthy communities	+	0	+	0	+	0	+	+	Reducing health inequalities will have particular positive impacts for children, younger and older people and people with disabilities.		
EH8 Hot food takeaways	+	0	0	0	0	0	0	0	The policy will have a potential positive impact on healthy eating for school children.		
Infrastructure Delivery											
INF1 Delivering infrastructure	0	0	0	0	0	0	0	0			
Managing and Reducing Flood Risk											
FR1 Managing flood risk	0	0	0	0	0	0	0	0			
FR2 Sustainable Drainage System (SUDS)	0	0	0	0	0	0	0	0			

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations				
and integrated flood risk management													
FR3 Protecting and enhancing watercourses	0	0	0	0	0	0	0	0					
invironment, Biodiversity and Geodiversity													
NE1 Protection of sites	0	0	0	0	0	0	0	0					
<b>NE2</b> Protected species and priority species and habitats	0	0	0	0	0	0	0	0					
<b>NE3</b> Biodiversity and geological enhancement	0	0	0	0	0	0	0	0					
<b>NE4</b> Green infrastructure	0	0	0	0	0	0	0	0					
<b>NE5</b> Conserving and enhancing landscape Character	0	0	0	0	0	0	0	0					
<b>NE6</b> Environmental pollution	+	0	0	0	0	0	0	0	Children are most susceptible to negative impacts of pollution and therefore policies to reduce pollution are likely to have positive impacts on this group.				
Heritage													
<b>HE1</b> Strategy for the conservation and enjoyment of the historic environment	0	0	0	0	0	0	0	0					
HE2 Heritage and development	0	0	+/-	+/-	0	0	0	0	Policies may have positive or negative impacts for religious groups or certain ethnic groups who have connections to heritage assets depending on the proposals for such assets.				
Public Open Space, Leisure and Recreation													
L1 Facilities acceptable in the parks	0	0	0	0	0	0	0	0					

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations
L2 Protection of open space and existing facilities	0	0	0	0	0	0	0	0	
L3 Change of use amenity open space	0	0	0	0	0	0	0	0	
L4 Public open space provision in new estates	0	0	0	0	0	0	0	0	
L5 Horse related development	0	0	0	0	0	0	0	0	
L6 Criteria for the location of water sports	0	0	0	0	0	0	0	0	
L7 Criteria for the location of noisy sports and recreational facilities	0	0	0	0	0	0	0	0	
L8 Milton Keynes Bowl	0	0	0	0	0	0	0	0	
Design									
<b>D1</b> Designing a high quality place	0	0	0	0	0	0	0	0	
D2 Creating a positive character	0	0	0	0	0	0	0	0	
D3 Design of Buildings	0	0	0	0	0	0	0	-	Recent issues around cladding have highlighted the potential safety issues with low cost materials. Those in lower social income groups and ethnic groups are more likely to receive negative impacts as a consequence of poor building design and materials.
D4 Amenity and street scene	0	0	0	0	0	0	0	0	
D5 Granny annexes	+	0	0	0	0	0	0	0	Granny annexes will provide additional accommodation predominantly for older people and therefore potential positive impacts for this group.
D5 Canalside development	0	0	0	0	0	0	0	0	

Policy area and draft policies	Age	Gender	Ethnicity	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Socio-economic Status	Justifications/ Recommendations			
D6 Mains and Telecommunications Services	0	0	0	0	0	0	0	0				
D7 Temporary Buildings	0	0	0	0	0	0	0	0				
Culture and Community												
CC1 Percent for Art	0	0	0	0	0	0	0	0				
CC2 Location of community facilities	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	Impacts will depend on the type of community facilities and nature of			
CC3 Protection of community facilities	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	the development. It is recommended that individual developments are required to have specific equality impact assessments.			
CC4 Childcare facilities	+	0	0	0	0	0	+	0	Policies for childcare facilities should provide a positive impact on children and their parents.			
CC5 New community facilities	+	+	+	+	+	+	+	+	New community facilities can have positive impacts for all groups depending on the type of facility and services provided.			
CC6 Burial and memorial grounds	0	0	0	+/-	0	0	0	0	Need to recognise different faiths and religions have different needs in terms of burial and memorial sites			
Sustainable Construction and Renewable Er	nergy											
SC1 Sustainable Construction	0	0	0	0	0	0	0	0				
<b>SC3</b> Community Energy Networks and Large Scale Renewable Energy Schemes	0	0	0	0	0	0	0	0				
<b>SC4</b> Low Carbon and Renewable Energy Generation	0	0	0	0	0	0	0	0				

# 6. Findings and Recommendations

# 6.1 Screening results

This report has outlined the approach, evidence and findings for the EqIA screening for the draft Plan:MK (October 2017). The screening has considered equality legislation and MKC's duty under the Equality Act 2010 and PSED as well as evidence from national demographic datasets and feedback from stakeholder consultation.

The screening assessment has been undertaken by examining each of the individual policies set out in Plan:MK and identifying any potential differential or disproportionate negative or positive impacts on groups with protected characteristics. Recommendations for mitigation against negative impacts have been made in order that MKC meets its duty under the Equality Act 2010, eliminating potential discrimination and advancing equality of opportunity.

### 6.1.1 Positive impacts

There are a number of Plan:MK policies that could provide differential positive impacts to groups with protected characteristics across Milton Keynes. The majority of these impacts are related to policies that promote accessibility and connectivity to housing, employment, education and leisure facilities and opportunities, protect community facilities, encourage healthy lifestyles and encourage accessibility in design.

It is recommended that ongoing monitoring of these policies takes place throughout the development and adoption of Plan:MK to ensure that the positive impacts are realised and equality of opportunity is advanced.

### 6.1.2 Positive and negative impacts

Many policies within Plan:MK have been identified as having both potential differential negative and positive impacts on groups with protected characteristics. This assessment has been made for policies where:

- The impact could be could be negative or positive on the same group. For example, where a new
  housing development might result in the temporary or permanent relocation of residents this may
  have a particularly negative impact on lower income groups. However, such a development could
  also provide affordable housing resulting in potential benefits for people from this group; or
- There is insufficient evidence to understand the direction or level of impact. For example, protection or change of use of community facilities may result in either negative or positive impacts depending on the type of facility and the intended use.

Some specific recommendations have been included within the screening table for mitigation against potential negative impacts. However, it is clear that for some policies the potential impacts would be better assessed at a development level. Therefore it is recommended that specific EqIA should be undertaken for planning applications relating to policies where the screening assessment has been ambiguous.

### 6.1.3 Negative impacts

Three policies have been identified as having potential negative impacts on at least one of the groups with protected characteristics. These are as follows:

**ER8 Places of worship on employment sites** - this has been negatively assessed due to the wording in the text of Plan:MK which implies that planning permission could be approved if worship or religious activities do not take place on a weekday. Milton Keynes currently has 15% of the population who follow a non-Christian religion. Many of these religions worship on days outside of the weekend and as such the Council could be directly discriminating on the grounds of religion should they approve planning permission for one place of worship and not for another based on customs of a religion.

**Recommendation:** This policy should be revised to remove references to weekday worship or any criteria that may put any religious group at a disadvantage over others in terms of obtaining planning permission.

**D3 Design of buildings** – Over recent months some local authorities have identified poor quality materials used for cladding in low cost and social housing refurbishments. The effects of using these materials have had devastating negative impacts on communities particularly affecting groups with protected characteristics. Although this policy refers to the use of high quality and durable materials it does not explicitly mention safety.

**Recommendation**: This policy should clearly mention safety when referring to building materials and a statement should be included stating that high quality materials should be used regardless of the type or cost of residential development.

**Policy HN3 Supported and specialist housing** – this policy identifies older people as requiring supported and specialist housing but does not identify a need for this type of housing for younger people who may be vulnerable and require support.

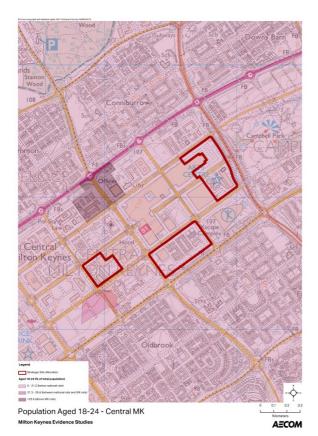
**Recommendation**: This policy should also consider the inclusion of supported housing for young people.

## 6.2 Next Steps

This report outlines the findings of the initial EqIA Screening report (v1) for Plan:MK. It is suggested that MKC take into consideration the recommendations put forward for mitigation against any negative impacts. Additionally this screening should be continuously updated during the development and adoption of Plan:MK to ensure that any new equality issues are identified.

This screening should be used to guide Plan finalisation during the Examination stage. However, more in depth assessments might be needed where relevant issues have been identified and as policies are adopted and implemented.

# Appendix A - Socio-demographic maps



### Figure 3 Central MK: Population Aged 18-24 years



Figure 4 Central MK: Asian/British Asian Population

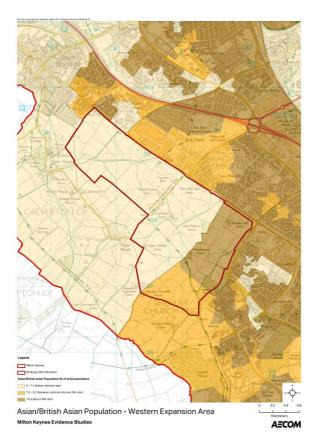


Figure 5 Western Expansion Area: Asian/British Asian Population

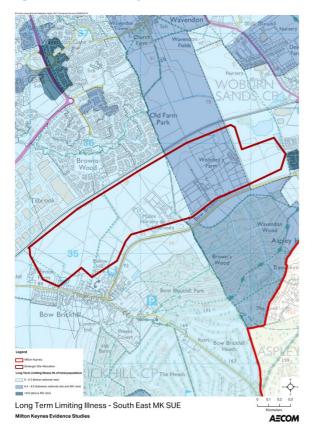


Figure 6 South East Milton Keynes SUE: Population with Long Term Limiting Illness



## Figure 7 South East MK SUE: Population aged over 65

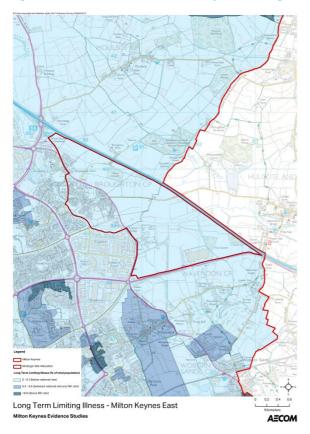
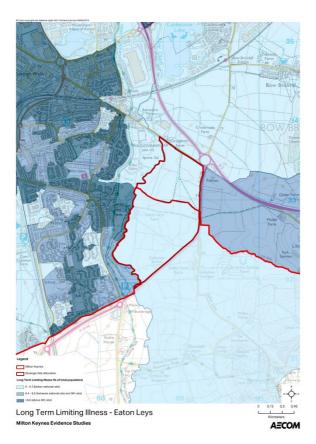


Figure 5 Milton Keynes East: Population with a long term limiting illness



### Figure 6 Eaton Leys: Population with Long Term Limiting Illness

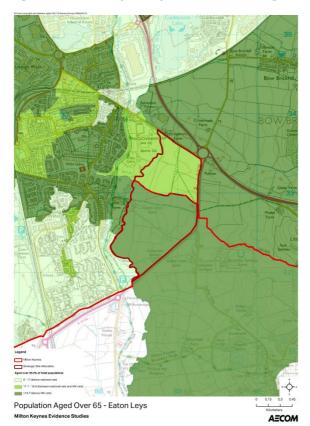


Figure 7 Eaton Leys: Population aged over 65

Equality Impact Assessment

Equality Impact Assessment

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