

Inner Moray Firth Local Development Plan Equalities Screening

Plana Leasachaidh Ionadail Linne Mhoireibh A-Staigh Sgrionadh Co-ionannachd

March 2022

Equalities Screening for:

Inner Moray Firth Local Development Plan 2:

Proposed Plan

Service	Person Responsible
Planning, Environment & Low Carbon Transport	Tim Stott
Created	Last Review
14 February 2022	31st July 2020
Status	Next Review
Screened	14 February 2023

Screening Data

1. Please give the title/description of the policy. The word "policy" will be used throughout as shorthand for policy, service, function or proposal.

Inner Moray Firth Proposed Local Development Plan 2 (IMFpLDP2, referred to hereinafter as “the Plan”)

The Inner Moray Firth LDP will be the first Highland local development plan to be renewed. Along with the Highland-wide Local Development Plan and Supplementary Guidance, it will form the Highland Council’s approved development plan which will shape all future development in the Inner Moray Firth area. Following on from the initial awareness raising and ‘Call for Sites and Ideas’ stage and the Main Issues Report public consultation in 2021, this Plan is the second and last statutory public consultation stage in the plan preparation process. The consultation timing and method is part prescribed in primary and secondary legislation. We have already taken account of feedback received on the Main Issues Report in shaping the Plan.

The Plan will be published online in a navigable webpages format but will also be available as a “fixed” PDF file, and on request, as a hard copy paper (an extract will be sent to the enquirer). The Plan and associated documentation will be publicised, through both digital and print media and by direct digital and paper mailing of directly affected parties (neighbours of potential development sites) and those that have asked to be kept informed and are on the Council’s planning policy documents database. The Highland Council’s Service Centre staff will be briefed on how best to direct general telephone queries about the Plan. Following publication there may be public consultation events (Covid-19 pandemic restrictions permitting) to explain the Plan’s content, to prompt verbal debate and then to seek written representations. The process of consultation will encourage the majority of respondents to complete online comments via an externally hosted website and software known as the ‘Objective Consultation Portal’. There will be a video guide for filling in the form online and there will also be guidance for other formats of submission available. Additionally, a press release that explains the process to the public will be issued to media.

2. Name of the person carrying out the screening

Tim Stott

3. Date of screening

14 February 2022

4. What are the aims and objectives of the policy?

Every council in Scotland must prepare at least one local development for its area. Its purpose is to provide a policy framework for deciding on individual planning applications but also to give more certainty to developers, infrastructure providers and local communities as to where future growth will be so that more informed public and private investment decisions can be made whether that's new school investment, someone moving house or a company wishing to relocate. For the bigger development sites in the bigger settlements the Plan makes an in-principle decision on what type of development should happen where. Given this importance a very wide range of individuals and groups could have an interest in and wish to express an opinion on what the Plan should include. The Proposed Plan stage is the key statutory stage for any party who disagrees with the Council's choice of planning policies and future development sites to object and then have that objection referred to an independent Scottish Government appointed Reporter for decision. The Plan documentation, the publicity and consultation arrangements and online representation form will allow a variety of contributions from a wide range of the population local to the region as well as those further afield who have an interest in the area. To make sure that all equality groups are encouraged to take part we will be where possible contacting these groups directly to actively encourage them to become involved in the process.

5. Which parts of the public sector duty is the policy relevant to?

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

6. Is the policy relevant to equality groups? Is there potential for this policy to affect any of these groups differently? The effect could be positive or negative.

Equality Issue/Group	Potential Effect?
Gender	Y
Age	Y
Disability	Y
Race	Y
Religion or Belief	Y
Sexual Orientation	Y
Gender reassignment	Y
Pregnancy/maternity	Y
Shielded	Y

7. If you ticked any group in Question 6, is there any evidence of, or potential for, negative impact?

YES

All Groups:

The IMFLDP2 is an important statutory planning policy document that will impact directly or more commonly, indirectly on the lives of all Highland residents. It will help determine the type and location of most significant future development across the Inner Moray Firth. Therefore, it may affect how and where each resident can access education, recreation, healthcare, other public services, leisure, shopping and employment.

It is vital that all groups have equal access to the Plan's consultation process to have an equal opportunity to influence the IMFLDP2's content. Potentially, there could be different degrees of accessibility for different groups.

The Council's choice of Plan; documentation (mainly online and in English language only) publicity (mainly online), consultation event (if permissible under Covid-19 regulations) venues (mainly public buildings), consultation event locations (mainly in the largest settlements), event timings (weekday afternoons and evenings) and comment options (strongly encouraged as online and in English language only) may inhibit accessibility for certain groups.

Our standard consultation methods may disadvantage those without computer or English language literacy and/or those unable to attend or express themselves at the consultation venues/events.

The Covid-19 pandemic and its implications for the safety of face-to-face consultation events particularly for shielded groups needs to be addressed.

8. Is there evidence that the policy contributes positively to the promotion of equality on any particular group?

YES

Age: Our increased use of social media has already had a positive effect in making the Main Issues Report more accessible to young people and the continued use of printed press adverts and article coverage should reach an older audience. These media will both be used to advertise the Plan of how to find out more and also explain how to lodge formal comment. On request we can also produce the Plan in different formats (e.g. large print).

Disability: Use of social media, public events (if permissible under Covid-19 regulations) (with an emphasis on drop-in one-to-one discussions, round-table workshops rather than formal public meetings), local press to widely publicise the process in an attempt to involve people of all abilities. There is the option of submitting the online form in different formats and the opportunity to get assistance with filling in the form. On request we can also produce the Plan in different formats (e.g. large print).

Race: Colour, nationality, ethnic or national origins. This would include Gypsies and Travellers. For those whose first language is not English, further assistance with filling in the online form and access to the translation service may be required. On request we can also produce the Plan in different formats or translated if necessary.

Religion or Belief: Our social media campaign reaches out to a wide range of services/organisations that represent these groups/interests to encourage participation in the process.

All Groups: The publication of the Plan will be publicised locally, will be available online and electronically in local libraries. The form for comments is an online form and means that it can be

filled in at any time and any location with internet access. In addition, our social media campaign reaches out to a wide range of services/organisations that represent these groups/interests to encourage participation in the process.

9. If there is evidence of, or the possibility of, negative impact, can immediate remedial or mitigating action be taken without the need for a full EQIA?

YES

The Plan will be made available electronically for viewing at local libraries in addition to online. Different formats of the Plan are available on request. In addition to the online representation form there is also the option to get in touch with the Council via email, telephone or post to request alternative formats of the form (e.g. large print) and alternative arrangements for making a representation (e.g. on a postal form). This means that those that do not have internet access or are not computer or English language literate are able to take part. Assistance with filling in the form as well as assistance from the translation service will also be available. This is designed to assist people with physical or learning disabilities as well as those who do not have English as a first language. Groups will also be alerted by our social media campaign to make them aware of the Plan and consultation process. We will use a variety of means to publicise the consultation arrangements and to disseminate information about the issues being consulted upon in the Plan, in order to enable people to be involved.

In general terms the IMFLDP itself will not differentiate between equality groups. Furthermore it may be noted that the IMFLDP will be used alongside general policies already existing within the Highland-wide Local Development Plan plus Supplementary Guidance which have all be subject to their own EqIA.

With respect to Data Protection, respondents complete and maintain their own entry in the online consultation Portal called Objective. Those responding to the consultation will be made aware that the Plan process is a public process and their names may appear in some public documents. However, the addresses and other personal details of all respondents don't appear in any public domain. This is in line with Highland Council's data protection policy and should also help protect against any harassment of protected groups or indeed any individual.

In terms of mitigation for the Covid-19 pandemic, although there may be few, direct, different implications for the potentially adversely affected groups relative to the rest of the population, we will consider a range of contact options for the shielded and other listed groups with a preference for one-to-one phone and online discussions if requested and should they prove necessary.