



Hartley Gardens

EQUALITY IMPACT ASSESSMENT

Supplementary Planning Document



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WSP

8 First Street

Manchester

M15 4RP

Phone: +44 161 200 5000

WSP.com



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1

INTRODUCTION



1 INTRODUCTION

Overview of Equality Impact Assessment

- 1.1.1. An Equality Impact Assessment is a measure that is often undertaken prior to implementing a policy, with a view to ascertaining its potential impact on equality and groups with protected characteristics. An Equality Impact Assessment is an opportunity to consider whether a policy, strategy or project has the potential to impact all groups proportionally, or whether there may be a differential or disproportionate positive, negative or neutral impact on particular groups.

Purpose of this assessment

- 1.1.2. This Equality Impact Assessment has been prepared to accompany the Supplementary Planning Document (SPD) created for the development proposals at Hartley Gardens (the 'Site'), located within the administrative boundary of Tendring District Council (TDC) (the 'Proposed Development').
- 1.1.3. This Equality Impact Assessment has been prepared as an appraisal of the SPD. The assessment considers the development proposals at the Site and articulates the likely effects and impacts on Protected Characteristics, as identified by section 149 of the Equality Act 2010.

Proposed Development at Hartley Gardens

- 1.1.4. The Tendring adopted Local Plan Section 2 (January 2022) (LPS2), aims to deliver Policy SAMU2 (Development at Hartley Gardens, Clacton), as a high-quality urban extension. This allocation will respect the built and landscape character, and context of the local area while promoting sustainable development.
- 1.1.5. LPS2 Policy SAMU2 sets out the requirements for the Site allocation which is the largest proposed area for mixed use development in Tendring.
- 1.1.6. The following is an excerpt from Policy SAMU2 as presented in the Tendring Local Plan¹.

Policy SAMU2

Land north of Bockings Elm and west of A133 shown on the Map SAMU2, is allocated for long term mixed use development for the phased and comprehensive delivery of the following:

- a. approximately 1,700 new homes of mixed sizes and types to meet evidenced local housing need within the Council's most up to date Strategic Housing Market Assessment and to include 30% affordable housing as set out in Policy LP5;
- b. up to 7 hectares of land for employment;
- c. 2.1 hectares of land for a new two-form entry primary school with co-located 56 place early years and childcare facility, 0.13 hectares of land for a second 56 place stand-alone early years and childcare nursery and/or financial contributions towards primary school and secondary school provision as required by the Local Education Authority based on evidenced need;
- d. New facilities and/or financial contributions to support new health provision based on evidenced need;
- e. Green infrastructure which should provide a multi-functional and connected network, including amenity green space, parks, allotments and natural and semi natural green space

¹ TDC (2022), Local Plan, Policy SAMU2

(meeting the standards set out in Policy HP5) and providing for attractive green walking and cycling routes;

- f. To deliver at least 10% biodiversity net gain;
- g. A sustainable movement network, including principal points of highway access, a hierarchy of streets, facilitating public transport and prioritising the connection of walking and cycling routes within the site and beyond; and
- h. The provision of sufficient utility infrastructure working with the relevant infrastructure providers to ensure that such provision is achieved in a timely manner.

The development will follow a comprehensively master-planned approach to be set out in a site-specific Supplementary Planning Document (SPD) or comprehensive masterplan which has been prepared for approval by the Council. The purpose of the SPD or masterplan will be as follows:

- i. provide further detail on the geographical extent and boundary of the allocation, ensuring a defensible and sensitive boundary to the open countryside beyond;
- ii. provide the means to inform, assess and determine planning applications and secure comprehensive, co-ordinated and integrated sustainable development; and
- iii. facilitate and support the co-ordination and timely delivery of the green, social and physical infrastructure necessary to facilitate growth in this location.

Hartley Gardens Supplementary Planning Document

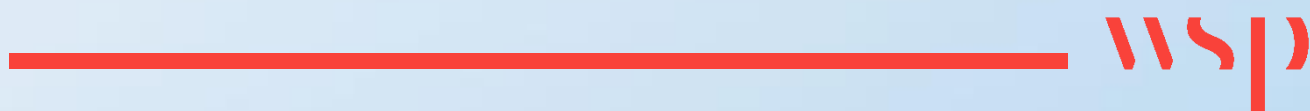
- 1.1.7. The Hartley Gardens SPD has been prepared to guide planning decisions relating to development proposals at the Site.
- 1.1.8. The development of the Site will follow a comprehensively masterplanned approach as promoted in the Local Plan and as set out in the SPD, prepared by TDC in collaboration with Essex County Council (ECC). The policy framework for the Site will also include an agreed Spatial Framework and a site-specific Infrastructure Delivery Plan (IDP) to provide further detail to the SPD².
- 1.1.9. As presented in the SPD, its purpose is to:
- Ensure that the development of the Site supports and delivers the overarching policy objectives set out in Policy SAMU2 (Hartley Gardens) of TDC Local Plan LPS2.
 - Ensure a comprehensively and co-ordinated masterplanned approach to development, incorporating a robust green and blue infrastructure framework that enhances environmental sustainability and biodiversity.
 - Inform the geographical extent and boundary of the allocation, ensuring a defensible and sensitive boundary to the open countryside beyond.
 - Provide the means to inform, assess and determine planning applications and secure comprehensive, co-ordinated, and integrated sustainable development.
 - Facilitate and support the co-ordination and timely delivery of the green, social, and physical infrastructure necessary to facilitate growth in this location³.

² Hartley Gardens Supplementary Planning Document

³ Ibid

2

POLICY CONTEXT



2 POLICY CONTEXT

2.1.1. This chapter presents policy relevant to Equality Impact Assessment.

Equality Act (2010)

2.1.2. Protected Characteristics are identified by section 149 of the Equality Act 2010. This legislation requires public sector organisations and those acting in a public capacity to fulfil their public sector equality duty (PSED) by considering the impact of policies and proposals on people with Protected Characteristics.

2.1.3. The list of Protected Groups identified by the Equality Act 2010 is outlined in Table 2-1 below.

Table 2-1 - Protected Groups identified in the Equality Act 2010

Protected Characteristics
1. Age
2. Disability
3. Gender (sex)
4. Gender reassignment
5. Marriage and civil partnership
6. Pregnancy and maternity
7. Race/ethnicity
8. Religion and belief, including non-belief
9. Sexual orientation

Source: Equality Act (2010), Section 149

2.1.4. The Equality Act 2010 requires all public sector bodies to comply with the Public Sector Equality Duty. Public authorities exercising public functions must have due regard to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

National Planning Policy Framework

2.1.5. This assessment aims to comply with the National Planning Policy Framework (NPPF), specifically in regards to the following paragraphs:

- Paragraph 60: To support the government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- Paragraph 131: The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process⁴.

Tendring Equality Impact Assessment Policy

- 2.1.6. TDC’s Equality Impact Assessment Policy (2022), provides the following detail with regard to TDC’s approach to Equality Impact Assessment:

Equality Impact Assessments (EIA) are a tool to ensure that our plans and activities meet the needs of individuals and groups that use our services and in addition, that a person’s chance of leading a healthy life, free of discrimination, is the same wherever they live and whoever they are. This helps to shape Council activities that are fit for purpose and which meet the needs of Tendring’s communities and workforce. It is recommended to undertake an Equality Impact Assessment (EIA) in order to evidence “due regard” (as required under the PSED) and demonstrate that appropriate analysis of any equality implications has been undertaken.

A robust, rigorous and transparent EIA process provides a consistent method of assessment and ensures that any potential detrimental effects or discrimination is identified, eliminated where possible or mitigated. The EIA also provides the opportunity to highlight and improve on positive impacts. By recording improvements the organisation will be able to record and collect examples of best practice and innovation that may inform its future developments.

The outcome of the EIA can be referred to and recorded within the relevant decision document, therefore ensuring that the decision maker, (for example a Portfolio Holder or authorised Officer), is making an informed decision on all of the facts, considerations and implications, with the reasons for the decision set out. An EIA should be accessible to the decision maker or a third party should they wish to review its contents⁵.

- 2.1.7. With regard to PSED, TDC’s policy states:

“The Public Sector Equality Duty (PSED) came into force on 5 April 2011 and is set out in Section 149 of the Equality Act 2010. It places a duty on public bodies to ensure they play their part in making society fairer.

Public authorities exercising public functions must have “due regard” to eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations between communities.

⁴ MHCLG, (December 2024), NPPF

⁵ TDC (2022), Equality Impact Assessment Policy

Any time the organisation plans a new service, reviews an existing one, or develops a policy it must think about the range of people who might use that service, or be affected by that policy and what barriers to access might be unintentionally created.

The duty cannot be delegated and will always remain the responsibility of the public body subject to the duty, in this instance, Tendring District Council. For example, when contractors are delivering services on the Council's behalf, the onus remains with TDC to ensure that they are delivering accessible, discrimination-free services.

Additionally, there is an obligation of reconsideration. This means that policies, strategies, projects and services must be kept under review as they evolve and when impacts of a decision are being felt. Adequate written records must always be kept of the decision-making processes undertaken.

The Equality and Human Rights Commission is responsible for enforcing compliance with the PSED. If public bodies are not robust when considering the implications of proposals, they can leave themselves open to judicial challenges"⁶.

2.1.8. TDC's policy discusses the benefits of PSED:

"By integrating equality into the core business and thinking of the organisation when carrying out our work we can:

- Avoid discriminatory practices and adverse impacts on equality.
- Ensure our services are more efficient and cost effective, thereby improving public satisfaction.
- Build a supportive working environment resulting in increased productivity, staff satisfaction and retention.
- Using current equality information can lead to better decision-making and policy development"⁷.

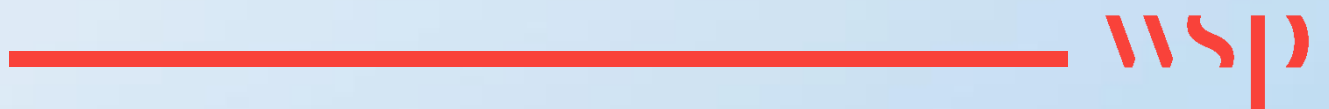
⁶ Ibid

⁷ Ibid



3

BASELINE DATA ANALYSIS



3 BASELINE DATA ANALYSIS

3.1 INTRODUCTION

3.1.1. As outlined in the previous chapter, in order to understand the baseline conditions of groups with Protected Characteristics within the local area, WSP has gathered information from a range of sources to understand the likely presence of populations with Protected Characteristics in the local area.

3.1.2. In undertaking this assessment, WSP has drawn on data from the following sources:

- Office for National Statistics (ONS), 2021 Census;
- ONS, Mid-year population estimates (2022);
- Office for Health Improvement and Disparities, Local Authority Health Profiles; and
- Ministry of Housing, Communities and Local Government, Indices of Multiple Deprivation.

Data limitations

3.1.3. There are limitations in the availability of data that can be used as part of the baseline assessment pertaining to particular Protected Groups. For instance, a number of indicators such as sexual orientation and gender reassignment in particular can be subject to survey bias and may not present an accurate picture of the prevalence of these groups within the local populations. On this basis, information where available has been used to supplement the data provided.

Impact areas

3.1.4. For data analysed in this baseline, impact areas are as follows:

- **Neighbourhood impact area** – the Lower-Layer Super Output Areas (LSOAs) encompassing the site, known as Tendring 013A, Tendring 13B and Tendring 13C (hereby known as Tendring 013A-C);
- **Local impact area** – the wards of Cann Hall and Bluehouse (due to the site being located on the border of both of these wards); and
- **Wider impact area** – the broader area of Tendring District.

3.1.5. For comparison purposes, data is also provided for both the regional and national level where possible.

3.2 PROTECTED CHARACTERISTIC 1: AGE

3.2.1. According to the 2021 Census there are approximately 148,900 people living in Tendring district.

3.2.2. The population proportions presented above indicate that the wards of Cann Hall and Bluehouse together have a younger demographic compared to the Tendring as a whole. It should be noted that approximately 30% of the district's population are aged 65 and older compared to the average of 23% across both wards. The proportion of each age group within the impact areas is demonstrated in Table 3-1.

Table 3-1 – Population by age group (Census 2021)⁸

	Cann Hall and Bluehouse wards	Tendring District	East of England	England
0-15 years	19.3%	15.8%	18.7%	18.6%
16-64 years	57.3%	54.6%	61.6%	63.0%
65+ years	23.4%	29.6%	19.6%	18.4%

3.3 PROTECTED CHARACTERISTIC 2: DISABILITY

Self-reported health

- 3.3.1. As part of the 2021 Census, respondents were asked to provide a subjective assessment of their general health. There are five different types of rating, ranging from “very bad health” to “very good health”. The findings provide a useful indicator of self-perceived health and are demonstrated in Table 3-2 below.
- 3.3.2. Overall, the average across the LSOAs of Tendring 013a-c respondents reporting to have ‘good’ or ‘very good’ health was higher compared to all other geographies. The wards of Cann Hall and Bluehouse had the lowest rate of ‘good’ and ‘very good’ health, whilst also having the highest rate of ‘bad’ and ‘very bad’ health across all geographies.

Table 3-2 – Self-assessment of health (2021 Census)⁹

	Tendring 013A-C	Cann Hall and Bluehouse wards	Tendring District	East of England	England
Very Good or Good Health	75.8%	73.6%	75.1%	82.9%	82.2%
Fair Health	16.9%	17.9%	17.2%	12.5%	12.7%
Bad or Very Bad Health	7.2%	8.5%	7.8%	4.6%	5.2%

Prevalence of disability and long-term illness

- 3.3.3. In addition to the self-assessment of health, the numbers of persons with an officially recognised disability or long-term illness were recorded during the 2021 Census.
- 3.3.4. The local authority performance is demonstrated in the following table which shows that 39.6% of households across Tendring 013a-c in 2021 had at least one resident with a long-term health

⁸ ONS (2022) Census 2021 Table TS007 – Age by single year [Online] available from: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2027>

⁹ ONS (2022) Census 2021 Table TS037 – General health [Online] available from: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2055>

problem or disability. This was in line with the district as a whole (39.7%) but significantly greater than regional (30.9%) and national averages (32.0%).

Table 3-3 – Households by number of persons with a long-term health problem or disability (2021 Census)¹⁰

	No people disabled under the Equality Act in household	1 person disabled under the Equality Act in household	2 or more people disabled under the Equality Act in household
Tendring 013A-C	60.4%	29.0%	10.6%
Cann Hall and Bluehouse ward	56.8%	31.7%	11.4%
Tendring District	60.3%	30.6%	9.2%
East of England	69.1%	24.5%	6.4%
England	68.0%	25.4%	6.6%

Comorbidity in Mental and Physical Illness

- 3.3.5. Mental and physical health is linked. Mental health and physical health are both determinants and consequences of each other. People with mental health conditions are more likely to have shorter lives, due to a range of lifestyle factors that impacts their health and increases the likelihood of health conditions.
- 3.3.6. The following Table demonstrates that residents in Tendring face poorer health outcomes in 17 of the 20 health conditions that are included in the NHS Outcomes and Quality Framework, compared to England averages. There are clear correlations between high rates of poor physical health in Tendring, such as asthma, chronic kidney disease, diabetes mellitus and hypertension, and patterns of higher rates of depression, reflecting the intrinsic connections between mental and physical health.

Table 3-4 – NHS Outcomes and Quality Framework (2023), prevalence of health conditions in Tendring and England

Health condition	Recorded relevance of total GP patients with health condition in Tendring	Recorded relevance of total GP patients with health condition in England, mean value	Above England average?
Asthma	8.15%	6.57%	Yes
Atrial Fibrillation	3.24%	2.13%	Yes
Cancer	5.12%	3.48%	Yes
Chronic Kidney Disease	7.04%	4.26%	Yes
Chronic Obstructive Pulmonary Disease	3.01%	1.92%	Yes

¹⁰ ONS (2022) Census 2021 Table RM060 – Household composition by number of people in household with a disability Age [Online] available from: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2160>

Health condition	Recorded relevance of total GP patients with health condition in Tendring	Recorded relevance of total GP patients with health condition in England, mean value	Above England average?
Coronary Heart Disease	4.45%	3.06%	Yes
Dementia	1.27%	0.76%	Yes
Depression	13.91%	13.29%	Yes
Diabetes Mellitus	9.80%	7.82%	Yes
Epilepsy	1.09%	0.82%	Yes
Heart Failure	1.4%	1.0%	Yes
Hypertension	20.47%	14.76%	Yes
Learning Difficulties	0.77%	0.57%	Yes
Non Diabetic Hyperglycaemia	5.66%	7.2%	No
Obesity	15.42%	11.84%	Yes
Osteoporosis	0.46%	0.83%	No
Palliative Care	1.18%	0.5%	Yes
Peripheral Arterial Disease	0.93%	0.59%	Yes
Rheumatoid Arthritis	1.18%	0.78%	Yes
Stroke And Transient Ischaemic Attack	1.66%	1.87%	No

Source: NHS Digital (2023), NHS Outcomes and Quality Framework (QOF) Data for 2022/23

Mental Health

- 3.3.7. Mental health is as important as physical health to our overall wellbeing. The World Health Organization (2004) defines mental health as: “a state of well-being in which every individual realises his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to her or his community.”¹¹
- 3.3.8. This definition is relevant when considering the potential influence and impact that Hartley Gardens could have on supporting the mental health of existing and new residents, because it reflects components of how individuals interact with their wider community in an area.
- 3.3.9. Aligning with the Equality Act definition for the Protected Group as those living with disabilities, mental health conditions are relevant as they can have “a ‘substantial’ and ‘long-term’ negative effect on your ability to do normal daily activities”¹².

¹¹ WHO (2004), Promoting Mental Health: Concepts, Emerging Evidence, Practice

¹² Equality Act (2010)

- 3.3.10. The Essex Joint Health and Wellbeing Strategy (2022-2026) states that “mental health and emotional wellbeing remain high on the agenda of all partners in Essex, perhaps more-so now due to the covid-19 pandemic”¹³.
- 3.3.11. The Livewell Essex model supports holistic planning and delivery of services to the whole population, aligned to the following pillars, the NHS Suffolk and North East Essex Integrated Care Board (ICB) echoes the Livewell domains, highlighting the ‘start well’ and ‘feel well’ domain as particularly relevant to mental health¹⁴.
- Start Well: giving children the best start in life
 - Feel Well: supporting mental well being
 - Be Well: empowering adults to make healthy lifestyle choices
 - Age Well: supporting people to live safely and independently as they grow
 - Stay Well: supporting adults with health and / or care concerns to access support to maintain healthy and fulfilling lives
 - Die Well: giving people nearing the end of life choice around their care.
- 3.3.12. The ICB has also launched a specific ‘Adult Mental Health, Learning Disability and Autism Inpatient Services Quality Transformation Strategy 2024 – 2027’. The strategy recognises the intersectionality of health and socio-economic trends within the ICB area, noting in particular the following themes:
- Poverty - Some people have more health inequalities than others. For example, when people live in poverty this can increase health problems including mental health difficulties.
 - Deprivation - Tendring is highlighted as one of the most deprived areas in Essex, and this is correlated with poorer health outcomes among the local population, both mental and physical.
 - Ageing – Tendring has a significantly larger proportion of residents aged 65 and above than Essex and England averages. Often, as people become older, they develop more than one health problem including mental ill-health.
- 3.3.13. Some examples are of mental health conditions are:
- Anxiety disorders
 - Depression
 - Obsessive-compulsive disorder
 - Bipolar disorder
 - Post-traumatic stress disorder; and
 - Schizophrenia.

Prevalence of mental health conditions

- 3.3.14. According to the latest (2019) indices of multiple deprivation dataset, Clacton-on-Sea has high levels of mental health needs. The sub-component of deprivation relating to health regarding ‘mood and anxiety disorders indicator’, is a broad measure of mental ill health in the local population.

¹³ ECC (2022), Essex Joint Health and Wellbeing Strategy (2022-2026), page 11

¹⁴ NHS Suffolk and North East Essex ICB (2024), Joint Forward Plan, 2024-2029

- 3.3.15. Clacton-on-Sea had the second highest score in the country, indicating that Clacton-on-Sea has the second highest mental health need in England¹⁵.
- 3.3.16. ECC's 'Essex Joint Health and Wellbeing Strategy (2022-2026)' finds that 16% of the population aged 16-74 across Essex has a common mental health disorder, and Tendring is one of four districts in Essex, including Essex, Harlow, Basildon, that have the highest prevalence rates of common mental disorders in those aged over 16¹⁶.

Suicide

- 3.3.17. Suicide rates in Essex are higher than national and regional averages and have been increasing over the past two decades. Essex has a suicide rate of 10.7 per 100,000 of population. The highest rates are in the more deprived areas of the county and the suicide rate in Tendring correlates with indicators of deprivation. Tendring, along with three other districts in Essex - Colchester, Harlow and Brentwood – are all among the top twenty local authorities in the country for high suicide rates¹⁷.

ESA Claimants and Mental Health

- 3.3.18. Employment and support allowance (ESA) is a type of benefit available for people if they have a disability that affects how much they can work. The number of ESA claimants for mental and behaviour disorders as a rate per 1,000 working age population is significantly higher in Tendring (40.0) compared to Essex (21.2) and England (27.3)¹⁸.

Health in Children

- 3.3.19. In terms of mental health, ECC's 'Essex Joint Health and Wellbeing Strategy (2022-2026)' highlights that the mental health of children and young people has been particularly impacted by the covid-19 pandemic. A national survey reports that 80% of young people with pre-existing mental health needs experienced an exacerbation and the development of new issues because of the crisis. Certain groups who experienced more negative impacts due to covid-19 were children with disabilities, including health conditions and special educational needs and disabilities (SEND)¹⁹. In Essex, 8.7% or 17,390 children and young people aged between 5-16 years have a mental health disorder.
- 3.3.20. ECC's Essex Joint Health and Wellbeing Strategy presents data on childhood obesity. In Essex, 63.8% of the adult population is overweight or obese, 22.3% of children aged 4-5 years old being overweight or obese and 33.1% of our 10–11-year-olds being overweight or obese. Tendring has the highest rate of children aged 4-5 year olds being overweight or obese (30%)²⁰.

Neurodiversity

- 3.3.21. There are many forms of neurodiversity, with some more commonly recognised than others. It is important to note intersectionality, as an individual can be neurodivergent in multiple ways and may also experience additional impacts to their physical or mental wellbeing that are connected to their condition.

¹⁵ MHCLG (2019), Indices of Multiple Deprivation

¹⁶ ECC (2022), Essex Joint Health and Wellbeing Strategy (2022-2026)

¹⁷ Ibid

¹⁸ Essex County Council (2022), Joint Strategic Needs Assessment. Note that this data point is from 2018, and therefore trends may have changed over recent years.

¹⁹ ECC (2022), Essex Joint Health and Wellbeing Strategy (2022-2026)

²⁰ Ibid

3.3.22. Commonly recognised types of neurodivergence include, but are not limited to:

- ADHD (Attention Deficit Hyperactivity Disorder)
- Autism (Autism Spectrum Disorder, ASD)
- Asperger Syndrome (Asperger's Syndrome, Asperger's Disorder)
- Bipolar Disorder
- Dementia
- Developmental Language Disorder
- Epilepsy
- OCD (Obsessive Compulsive Disorder)
- Tourette Syndrome; and
- Learning difficulties such as Dyslexia, Dyscalculia and Dyspraxia.

3.3.23. Data is not readily available for all types of neurodiversity at the local authority level, therefore the following section focuses on the following:

- Autism
- Dementia
- Epilepsy; and
- Learning difficulties.

Autism

3.3.24. The British Medical Association (BMA) states that one in 100 children in the UK have a diagnosis of autism spectrum disorder²¹, though it is noted that many go undiagnosed for a variety of reasons, for example, the way that ASD can present, and therefore it has been suggested the true scale may be much larger. The National Autistic Society report that as much as five times as many boys as girls have a diagnosed condition.

3.3.25. The National Autistic Society also report that there are at least 700,000 autistic adults in UK, of which only 15% are in employment²².

3.3.26. The Adult Psychiatric Morbidity Survey is the primary data source for monitoring trends in England's mental health. In 2007 it included autism for the first time, and found 1% of the population studied were autistic.

3.3.27. Demand for autism assessments has risen rapidly over the past 20 years.

3.3.28. The autism act 2009 set a statutory duty on NHS organisations and local authorities to provide appropriate services to assess autism in adults and to support autistic adults post-diagnosis. In 2019, the NHS 'long term plan' committed to reducing autism assessment waiting times and delivering packages of post-assessment support for children. In 2021, the NHS 'national strategy for autistic children, young people and adults' expanded upon this ambition, by committing to timely

²¹ BMA (2024), Autism Spectrum Disorder

²² National Autistic Society (2022)

access to diagnosis and demonstrably improved autism assessment pathways for people of all ages by 2026.

- 3.3.29. Data on the prevalence of autism at the local authority level is limited, however NHS data shows that the number of people who have been in contact with NHS funded secondary services for mental health, learning difficulties and autism services over the year 2022-2023 in the NHS Suffolk and south Essex Integrated Care Board (ICB) was 55,150 people, equivalent to 1.5% of the national total of 3,582,864 over the same timeframe. This is comparatively low compared to other ICBs in England, where rates are higher, particular in Greater Manchester and Cumbria²³.

Dementia

- 3.3.30. In Essex, the prevalence of patients with dementia is 0.81%, this is higher than England (0.71%) and the East of England (0.75%) averages²⁴.
- 3.3.31. Of all districts in Essex, Tendring has the highest prevalence of patients with dementia at 1.23%. Tendring faces significant challenges with dementia, in part, reflecting the high proportion of residents aged 65 and above, at approximately 30% of the population compared to the national average of 17%²⁵.
- 3.3.32. Previous data published by Alzheimer's research UK in 2019 found that coastal constituencies in the south of England have the highest number of people living with dementia per head of population. Christchurch, in Dorset, was ranked as the area with the highest prevalence of dementia in the UK, at 28 per 1,000 people, and Clacton was ranked as 5th in the country, with 2,244 people living with dementia, equivalent to a rate of 2.29% compared to the national average of 1.36%²⁶.

Epilepsy

- 3.3.33. Epilepsy affects almost one in every 100 people in the UK. Across Essex, the prevalence of patients with epilepsy was 0.79%, this is higher than the average for East of England (0.77%) but lower than the average for England (0.80%). Of all districts in Essex, Tendring has the highest prevalence of patients with epilepsy with 1.09%.

Learning difficulties

- 3.3.34. According to the latest NHS data on the Outcomes and Quality Framework (2023), the prevalence of patients registered as having a learning difficulty, such as Dyslexia, Dyscalculia and Dyspraxia, in Tendring, at 0.77% is higher than the comparator for England, at 0.57%²⁷.

²³ NHS Digital (2023), People who have been in contact with NHS funded secondary services for mental health, learning difficulties and autism.

²⁴ Essex County Council (2022), Joint Strategic Needs Assessment

²⁵ NHS Digital (2023), NHS Outcomes and Quality Framework (QOF) Data for 2022/23

²⁶ Alzheimer's Research UK (2023), Dementia Statistics Hub

²⁷ NHS Digital (2023), NHS Outcomes and Quality Framework (QOF) Data for 2022/23

Table 3-5 NHS Outcomes and Quality Framework, Prevalence of learning disabilities, Tendring and England, 2023

Health condition	Recorded relevance of total GP patients with health condition in Tendring	Recorded relevance of total GP patients with health condition in England, mean value	Above England average?
Learning Difficulties	0.77%	0.57%	Yes

- 3.3.35. The proportion of school pupils who require Special Education Needs (SEN) support is increasing nationally. Data is not available for the local authority of Tendring, data is only available at the local education authority level, for Essex, which shows proportion of pupils in who receive SEN support has increased by over 9.2% of since 2015/16²⁸.

Table 3-6 DfE Data on relevance on school age pupils receiving SEN support, 2015/16-2023/24

Year	Number of pupils in Essex who receive SEN support
2015/16	215,224
2016/17	218,222
2017/18	220,196
2018/19	222,969
2019/20	226,073
2020/21	228,123
2021/22	230,730
2022/23	233,395
2023/24	235,125

3.4 PROTECTED CHARACTERISTIC 3: GENDER (SEX)

- 3.4.1. Census 2021 provides data on males and females within each of the impact area geographies. It should be noted that the specific question that informed the Census 2021 dataset did not provide any options for persons who do not identify with male or female genders. Therefore, the figures may not be a true representation of the broader range of genders evident within the community.
- 3.4.2. The data in Table 3-7 demonstrates that the split between males and females is largely the same with the females accounting for over half the population across all geographies.

²⁸ DfE (2024), Pupils in all schools, by type of SEN provision - including independent schools and general hospital schools, 2016 to 2024, Essex

Table 3-7 – Gender split (2021 Census)²⁹

Gender	Tendring 013A-C	Cann Hall and Bluehouse wards	Tendring District	East of England	England
Male	47%	48%	48%	49%	49%
Female	53%	52%	52%	51%	51%

3.5 PROTECTED CHARACTERISTIC 4: GENDER REASSIGNMENT

- 3.5.1. Census 2021 provides an indication of the number of people in Tendring district who identified as the same sex registered at birth at the time of the Census. The data shows that 0.3% of residents in Tendring district do not identify as the same sex registered at birth. It should be noted that 5.9% of residents chose not to answer the question. These findings are presented in the following Table.

Table 3-8 – proportion of individuals who identify as the same sex registered at birth (2021 Census)³⁰

	Gender identity the same as sex registered at birth	Gender identity different from sex registered at birth but no specific identity given	Trans woman	Trans man	Non-binary	All other gender identities	Not answered
Tendring District	93.8%	0.1%	0.1%	0.1%	0.0%	0.0%	5.9%

3.6 PROTECTED CHARACTERISTIC 5: MARRIAGE AND CIVIL PARTNERSHIP

- 3.6.1. Following guidance on the PSED³¹, section 149(7) of the Equality Act 2010 sets out the list of 'relevant Protected Characteristics' which includes all Protected Characteristics listed in Table 1-1 of this report with the exception of 'marriage and civil partnership'. In relation to the Protected Characteristic of marriage and civil partnership, a body subject to the duty only needs to comply with the first aim of the duty (to eliminate discrimination) and only in relation to work (part 5 of the act). This is because the parts of the act covering services and public functions, premises, and education do not apply to that Protected Characteristic, as is relevant to this development³².
- 3.6.2. For completeness however, the proportions of marriage and civil partnerships within Tendring district and comparator areas, have been outlined in Table 3-9 below and will be included within our assessment.

²⁹ ONS (2022) Census 2021 Table TS008 – Sex [Online] available from: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2027>

³⁰ ONS (2022) Census 2021 Gender Identity [Online] available from: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/genderidentity/bulletins/genderidentityEnglandandwales/Census2021>

³¹ Equality and Human Rights Commission (2021) Technical Guidance on the Public Sector Equality Duty: England [Online] Available from: <https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-England>

³² The Equality Act. 2010. See s.28(1)(a), 32(1)(b), 84(1)(b), 90.

- 3.6.3. As shown in Table 3-9, married or in a registered civil partnership persons make up the largest proportion of Tendring district residents, followed by those who have never married nor had a civil partnership.

Table 3-9 - Marital and Civil Partnerships (2021 Census)³³

	Never married and never registered a civil partnership	Married or in a registered civil partnership	Separated, but still legally married or still legally in a civil partnership	Divorced or civil partnership dissolved	Widowed or surviving civil partnership partner
Tendring District	30.8%	46.2%	2.4%	11.4%	9.2%
East of England	34.8%	47.2%	2.2%	9.5%	6.3%
England	37.9%	44.7%	2.2%	9.1%	6.1%

3.7 PROTECTED CHARACTERISTIC 6: PREGNANCY AND MATERNITY

- 3.7.1. The ONS does not currently collect comprehensive, LSOA or ward-level data on the total number of people who are pregnant and are unlikely to in the future, due to the difficulty of assuring up-to-date data.
- 3.7.2. This assessment has proceeded under the assumption that these groups are likely to be represented across the neighbourhood impact area.
- 3.7.3. The ECC Joint Strategic Needs Assessment (2022) stated that Tendring had the second highest rate of teen pregnancy in Essex³⁴.
- 3.7.4. The latest data from the NHS finds that the rate of conception of those aged under 18 per 1000 population is 20.7 in Tendring, compared to 11.0 in the East of England and 13.1 across England³⁵.

3.8 PROTECTED CHARACTERISTIC 7: RACE AND ETHNICITY

- 3.8.1. The overall proportion of Black, Asian and Minority Ethnic (BAME) persons residing within the Tendring 013a-c LSOAs was 3.8%. While in line with the average of the Cann Hall and Bluehouse wards (3.7%) and Tendring district overall (3.8%), these proportions are significantly below the regional (6.4%) and national (9.6%) averages.
- 3.8.2. The majority of residents across the LSOAs are white, comprising 96.2% of the local population. This proportion is in line with the more local comparator areas but differs substantially to averages across the East of England and England as a whole.

³³ ONS (2022) Census 2021 Table RM074 – Legal partnership status by sex by age [Online] available from: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2174>

³⁴ Essex County Council (2022), Joint Strategic Needs Assessment

³⁵ Department of Health and Social Care (2024), Tendring Local Authority Profile

Table 3-10 - Population by Self-Described Ethnic Group (2021 Census)³⁶

	Tendring 013A-C	Cann Hall and Bluehouse wards	Tendring District	East of England	England
Asian, Asian British or Asian Welsh	1.3%	1.1%	1.2%	6.4%	9.6%
Black, Black British, Black Welsh, Caribbean or African	0.8%	0.7%	0.6%	2.9%	4.2%
Mixed or Multiple ethnic groups	1.6%	1.6%	1.6%	2.8%	3.0%
White	96.2%	96.3%	96.2%	86.5%	81.0%
Other ethnic group	0.1%	0.3%	0.4%	1.4%	2.2%

- 3.8.3. The 2021 Census found that the rates of economic activity in Tendring district differed when analysed on the basis of race. Table 3-11 below shows the proportion of economically active populations in Tendring district and the relative percentages of that population who were unemployed at the time of the 2021 Census.
- 3.8.4. As demonstrated in the Table below, of those who are economically active, the proportion in employment ranges from 46% in those categorised as 'white', compared to 61% in those categorised as 'Black, Black British, Black Welsh, Caribbean or African'.
- 3.8.5. When assessing the proportion who are economically active but unemployed, the data shows that the rate of unemployment is significantly higher among non-white ethnicities. Residents who are mixed race are at least twice as likely that an economically active person would be unemployed, compared to a white resident.
- 3.8.6. The rates of economic inactivity also vary substantially according to ethnicity, with the highest rate of inactivity among those categorised as 'white' at 51%, compared to the lowest rate of inactivity among those categorised as 'Black, Black British, Black Welsh, Caribbean or African' at 34%.
- 3.8.7. This demonstrates that unemployment and resultant deprivation arising from this low socio-economic status is more likely to be evident in the non-white population throughout the Tendring local authority area.

Table 3-11 – Economic Activity of residents aged over 16 years (2021 Census)³⁷

Ethnicity	Economically active: in employment	Economically active: unemployed	Economically inactive
All categories	47%	3%	50%
Asian, Asian British or Asian Welsh	59%	4%	37%
Black, Black British, Black Welsh, Caribbean or African	61%	5%	34%

³⁶ ONS (2022) Census 2021 Table TS021 – Ethnic Group [Online] available from:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2041>

³⁷ ONS (2022) Census 2021 Table RM018 – Economic activity status by ethnic group [Online] available from:

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2118>

Ethnicity	Economically active: in employment	Economically active: unemployed	Economically inactive
Mixed or Multiple ethnic groups	55%	8%	37%
White	46%	3%	51%
Other ethnic group	58%	3%	39%

3.9 PROTECTED CHARACTERISTIC 8: RELIGION

3.9.1. Table 3-12 highlights that there are a broad range of religions evident within the local area. For Tendring as a whole, the largest proportion were Christian, making up 49.3% of the population. This compares to 46.6% and 46.3% at the regional and national levels. However, across the Tendring 013a-c LSOAs and the wards of Cann Hall and Bluehouse, the largest proportion of residents did not identify as any religion.

Table 3-12 – Population proportion per religion type (2021 Census)³⁸

	Tendring 013A-C	Cann Hall and Bluehouse wards	Tendring District	East of England	England
Total: All usual residents	100.0%	100.0%	100.0%	100.0%	100.0%
No religion	47.3%	48.7%	43.2%	40.2%	36.7%
Christian	45.0%	43.5%	49.3%	46.6%	46.3%
Buddhist	0.3%	0.2%	0.3%	0.4%	0.5%
Hindu	0.2%	0.2%	0.2%	1.4%	1.8%
Jewish	0.2%	0.2%	0.2%	0.7%	0.5%
Muslim	0.5%	0.4%	0.4%	3.7%	6.7%
Sikh	0.0%	0.0%	0.0%	0.4%	0.9%
Other religion	0.4%	0.6%	0.5%	0.6%	0.6%
Not answered	6.2%	6.3%	5.9%	6.1%	6.0%

3.10 PROTECTED CHARACTERISTIC 9: SEXUAL ORIENTATION

3.10.1. Census 2021 provides local authority level data on sexual identity. The data indicates that 90.4% of residents in the district identify as straight or heterosexual compared to 91.3% and 89.4% at the regional and national levels. As indicated by Table 3-13 below, approximately 2.1% of residents in Tendring district identify as non-heterosexual, while the remaining 7.5% of the local population chose not to answer the question.

³⁸ ONS (2022) Census 2021 Table RM030 – Religion [Online] available from: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2130>

- 3.10.2. It is noted that many persons who identify as not being heterosexual may not state this in official surveys, such as those conducted by the ONS. Despite this however, there are no other nationally recognised statistics that can be relied upon.

Table 3-13 – Sexual orientation of Tendring District, East England region and England (2021)³⁹

Sexual orientation	% of Tendring population	% of East of England population	% of England population
Heterosexual or straight	90.4	90.2	89.4
Gay or lesbian	1.1	1.2	1.5
Bisexual	0.8	1.1	1.3
Other	0.2	0.3	0.3
Do not know or refuse	7.5	7.2	7.5

Deprivation

- 3.10.3. The English Indices of Multiple Deprivation (2019) enable comparisons to be made for a range of deprivation indicators at the small area level. Each deprivation domain is weighted, as follows:
- Income deprivation – with a weighting of 22.5%;
 - Employment deprivation – with a weighting of 22.5%;
 - Education, skills and training deprivation – with a weighting of 13.5%;
 - Health deprivation and disability – with a weighting of 13.5%;
 - Crime – with a weighting of 9.3%;
 - Barriers to housing and services – with a weighting of 9.3%; and
 - Living environment deprivation – with a weighting of 9.3%.
- 3.10.4. For this subsection, each LSOA of Tendring 013a-c is considered individually:
- Tendring 013a and Tendring 013c ranked 5,736 and 6,633 out of 32,844 neighbourhoods in England, placing them within the top 17.6% and 20.2% most deprived neighbourhoods in the country. These neighbourhoods experience significant deprivation with respect to the education, skills & training, employment, income and health domains ranking within the top 20% most deprived neighbourhoods in the country, as indicated by Table 3-14.
 - Tendring 013b appears to be relatively less deprived, ranking within the top 44.1% most deprived neighbourhoods in the country. That said, it performs relatively poorly with respect to the education, skills & training and health domains.
- 3.10.5. The IMD finds that Clacton-on-Sea has high levels of mental health needs. The sub-component of deprivation relating to health regarding ‘mood and anxiety disorders indicator’, is a broad measure of mental ill health in the local population.

³⁹ ONS (2022) Census 2021 Table TS077 – Sexual orientation [Online] available from: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2060>

- 3.10.6. Clacton-on-Sea had the second highest score in the country, indicating that Clacton-on-Sea has the second highest mental health need in England⁴⁰.

Table 3-14 – English Indices of Deprivation by LSOA (2019)⁴¹

	Tendring 013A (% most deprived)	Tendring 013B (% most deprived)	Tendring 013C (% most deprived)
Indices of Multiple Deprivation Decile	17.6	44.1	20.2
Income	17.5	36.5	17.6
Employment	15.4	38.7	16.8
Education, Skills & Training	9.6	26.9	14.3
Health	10.8	25.6	18.6
Crime	57.6	66.4	33.9
Barriers to Housing and Services	39.5	85.2	48.4
Living Environment	75.7	73.7	66.4

Children and Deprivation

- 3.10.7. Early childhood development is a key driver of health, educational and social outcomes across lifetimes.
- 3.10.8. On average, 16.4% of children in Essex live in low-income families. While this is below the England average, this ranges from 7.9% of children in Uttlesford to the highest proportion of 24% in Tendring⁴².
- 3.10.9. Areas in Tendring south, in which the Site is located have some of the highest prevalence of low income families in tendering and therefore there are high rates of children (aged under 17) experiencing higher rates of deprivation, for example:
- 19.0 % of children in Tendring are in non-working households, the highest proportion in Essex
 - 26.2% of children in Tendring are in low income families, the highest proportion in Essex
 - 48.7% of young people in Tendring have 5 A*-C at GCSE, the lowest in Essex.

Life Expectancy

- 3.10.10. Life expectancy in Tendring is relatively low for both males and females and infant mortality rates are comparatively high. There are major health inequalities across the district, for example those living in Alresford live on average 13 years longer than those living in pier ward, Clacton-on-Sea.
- 3.10.11. The NHS Suffolk and North East Essex ICB (2024), Joint Forward Plan, 2024-2029 finds that life expectancy in Essex has fallen in recent years. The latest data published in 2022 finds that life expectancy in Essex is 80.1 years for males and 83.4 years for females, a decrease from 80.2 years and 85.4 years, respectively, in 2018.

⁴⁰ MHCLG (2019), Indices of Multiple Deprivation

⁴¹ ONS (2019) English Indices of Deprivation [Online] available from <https://www.gov.uk/government/collections/English-indices-of-deprivation>

⁴² Essex County Council (2022), Joint Strategic Needs Assessment

- 3.10.12. Tendring has the lowest life expectancy at birth for both males (78.2 years), and females (82.0 years)⁴³.
- 3.10.13. Within Tendring, Tendring west has the highest life expectancy whereas Tendring south has the most residents with the lowest level of life expectancy. Life expectancy in the most deprived areas of Tendring is 10.6 years lower for men and 7.8 years lower for women in than in the least deprived areas. In the most deprived areas of Tendring, residents live shorter lives than the average for Essex and England, and, in addition, experience overall worse health⁴⁴.
- 3.10.14. There are four main causes of death which contribute to over two thirds of the life expectancy gap between the most and least deprived communities in Essex; circulatory disease, cancer, respiratory conditions, and digestive disorders are the main areas driving the differential life expectancy gap between communities in Essex. Combined, these four broad causes of death account for approximately 70% of the gap between those living in the least and most deprived areas of the county⁴⁵.
- 3.10.15. Data specific to Clacton-on-Sea identifies the following trends that contribute to lower life expectancy:
- Death rates under the age of 75 from all causes, cancer and circulatory diseases are higher in Clacton than in Tendring, the county of Essex and England
 - Clacton has the second highest mental health need in England
 - Hospital stays for self-harm are twice as high as in Essex as a whole
 - Emergency admissions to hospitals are higher in Clacton-on-Seas than other Tendring and Essex as whole for coronary health diseases, common obstructive pulmonary disorder, and hip fractures⁴⁶.

Languages Spoken

- 3.10.16. Census 2021 indicates the local area is marginally less linguistically diverse than Tendring district. The majority of households in Tendring indicated that their main language was English, equal to 98.3%. Whilst this was consistent across the geographies, the LSOAs had a marginally higher proportion of households that spoke east Asian languages compared to the district as a whole. This is demonstrated in Table 3-13.

⁴³ ECC (2022), Essex Joint Health and Wellbeing Strategy (2022-2026)

⁴⁴ Ibid

⁴⁵ NHS Suffolk and North East Essex ICB (2024), Joint Forward Plan, 2024-2029

⁴⁶ Chief Medical Officer's Annual Report (2021), Health in Coastal Communities

Table 3-13 – Languages spoken at home (2021 Census)⁴⁷

	Tendring 013A-C	Cann Hall and Bluehouse wards	Tendring District
English (English or Welsh if in Wales)	98.5%	98.3%	98.3%
Any other UK languages	0.0%	0.0%	0.0%
French	0.0%	0.0%	0.0%
Portuguese	0.1%	0.0%	0.0%
Spanish	0.1%	0.1%	0.1%
Other European language (EU)	0.6%	0.8%	0.8%
Other European languages (non-EU)	0.0%	0.1%	0.0%
Russian	0.0%	0.0%	0.0%
Turkish	0.0%	0.1%	0.1%
Arabic	0.0%	0.0%	0.0%
West or Central Asian languages	0.0%	0.0%	0.0%
South Asian language	0.2%	0.2%	0.2%
East Asian language	0.4%	0.3%	0.3%
African languages	0.0%	0.0%	0.0%

3.11 SUMMARY OF BASELINE ASSESSMENT

- 3.11.1. There is a broad mix of persons across a range of Protected Characteristics within the neighbourhood, ward and local authority impact areas, reflecting the diversity of the persons who live there and whom would likely move to the area and the Proposed Development in the future.
- 3.11.2. The baseline assessment is summarised below. While many of the findings show that trends are consistent with comparators areas, the main Protected Characteristic which stands out as being inconsistent is 'Protected Characteristic 2: disability', whereby a far higher proportion of local residents have a disability or a long-term illness. The additional baseline assessment on deprivation correlates with this, finding that there are pockets of the local community with higher levels of deprivation than regional or national average, which is often associated with poorer health outcomes.
- 3.11.3. There is a high potential that all Protected Groups will be represented in some shape or form within the surrounding and future population of the Proposed Development.

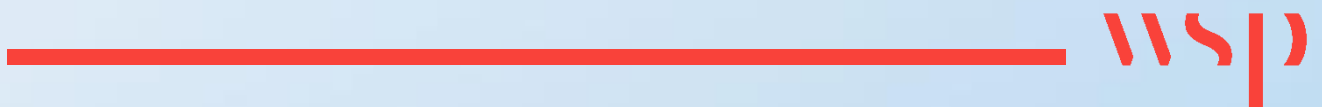
⁴⁷ ONS (2022) Census 2021 Table RM053 – Highest level of qualification by main language [Online] available from: <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=2153>

- **Protected Characteristic 1: Age** - The wards of Cann Hall and Bluehouse together have a younger population than Tendring as a whole, with 57% of the population being age 16-64 compared to 55% at the district level.
- **Protected Characteristic 2: Disability** - 39.6% of households across Tendring 013A-C in 2021 had at least one resident with a long-term health problem or disability. This was in line with the District as a whole (39.7%) but significantly greater than the national average (32.0%). Residents the local area in Tendring have very high rates of long-term illness (27%) compared to the East region (17%), with evidence suggesting poor mental health. However, the LSOAs of Tendring 013A-C had a higher proportion of residents who considered themselves to have 'very good' or 'good' health when compared with all other geographies. The LSOAs also performed better than the district average for having a lower proportion of their residents who deemed themselves to have 'bad' or 'very bad' health. NHS data demonstrates the intersectionality of mental and physical health, and finds that Tendring performs worse than the Essex average in 17 of the 20 health conditions listed in the NHS Outcomes and Quality Framework. Data on neurodiversity is limited at the local level, but data from Alzheimer's UK highlights a notable trend in Clacton as a 'hot spot' for dementia, ranked as 5th in the country.
- **Protected Characteristic 3: Gender (Sex)** - The split between male and female populations is relatively even, with the local authority having slightly more women (52%) compared to men (48%).
- **Protected Characteristic 4: Gender (Sex) Reassignment** - According to Census 2021, 0.3% of residents in Tendring District do not identify as the same sex registered at birth. It should be noted that 5.9% of residents chose not to answer the question and therefore, the figure may not be a complete representation of the broader range of genders evident in the community.
- **Protected Characteristic 5: Marriage and Civil Partnership** - With regards to marriage and civil partnership, the largest proportion of residents (46.2% of the Tendring District population) were either married or in a registered civil partnership. 30.8% were single and a further 11.4% were divorced or their civil partnership dissolved.
- **Protected Characteristic 6: Pregnancy and maternity:** The ONS does not currently collect comprehensive, LSOA or ward-level data on the total number of people who are pregnant and are unlikely to in the future, due to the difficulty of assuring up-to-date data. The assessment has proceeded under the assumption that these groups are likely to be represented across the neighbourhood impact area.
- **Protected Characteristic 7: Race and Ethnicity** - 96.2% of the population across the LSOAs of Tendring 013A-C identify as being White, with the next largest ethnic group being Mixed or Multiple Ethnic Groups (1.6%). These proportions were in line with the averages for the Cann Hall and Bluehouse wards and the District as a whole. There are evident links between race and socio-economic status across the district, with residents who identify as Mixed or Multiple Ethnic groups, were twice as likely to be unemployed than those who identify as being White.
- **Protected Characteristic 8: Religion** - Approximately 47.3% of residents in the LSOAs of Tendring 013A-C follow no religion. This compares to 43.2% at the ward level. Across all geographies, the religion with the highest proportion of residents was Christianity.

- **Protected Characteristic 9: Sexual Orientation** - The majority of the District's population identify as being heterosexual, equal to 90.4%. However, this relies upon data which is likely to be skewed by answer-bias on sensitive topics such as sexual orientation.
- **Deprivation:** The LSOAs of Tendring 013A and Tendring 013B are ranked in the 25% most deprived neighbourhoods in England, with significant levels of education, employment, income and health deprivation.
- **Life Expectancy:** This deprivation is linked to inequalities in life expectancy with a gap in HLE of 9.3 years for males and 7.7 years for females across the District of Tendring. For both males and females, this is below the national average of 9.7 and 7.9 years respectively.
- **Languages Spoken:** The majority of residents (at least 98%) across all geographic scales use the English language at home.

4

COMMUNITY ENGAGEMENT AND SPATIAL FRAMEWORK PROCESS



4 COMMUNITY ENGAGEMENT AND SPATIAL FRAMEWORK PROCESS

- 4.1.1. This chapter presents detail on the process of community engagement and approach to the development of the Spatial Framework. This provides detail as to how vulnerable groups, including those with Protected Characteristics have been considered throughout the development process.

Approach to community engagement

- 4.1.2. With regard to community engagement, this section provides a summary of the approach to engagement and then reports on engagement findings.
- 4.1.3. The approach to community engagement for Hartley Gardens is based on the following guiding principles:
- Inclusive, diverse, clear and transparent;
 - Early collaboration and co-design; empower to inform proposals;
 - Actively listening, respectful and build trust;
 - Set within wider placemaking context; and
 - Creative, bold and ambitious.
- 4.1.4. The above principles have informed the engagement strategy in several ways, such as:
- Local stakeholder mapping sought to identify local organisations and groups that represent a range of diverse needs and Protected Characteristics. The engagement activity has been structured across several engagement stages, with an early commitment to collaboration and bringing the community into the process before detailed design commences.
 - The engagement activity has included using Place-based Indicators (PBI's), developing an understanding of the local population, local needs and opportunities in relation to key themes.
- 4.1.5. TDC's Statement of Community Involvement (SCI) outlines how it engages the community when preparing plans, policy documents, and planning application decisions.
- 4.1.6. TDC will carry out a formal public consultation on the SPD to involve the community and stakeholders in its development. Residents and stakeholders will be invited to submit comments on the draft SPD. All feedback will be reviewed and taken into account in finalising the document before its adoption. A summary report of the consultation responses will be published on TDC's website alongside the adopted SPD, ensuring transparency and showing how the input has shaped the final version.
- 4.1.7. The SPD development process includes three stages of engagement:
- Stage 1: Evidence Gathering and setting priorities for the Vision and Spatial Framework
 - Stage 2: Public Participation on Draft SPD
 - Stage 3: Monitoring and Review following Adoption of SPD

Understanding Clacton-on-Sea

- 4.1.8. Ahead of engagement taking place, a desk-top review sourced from the HACT Community Insights Report, provided analysis of data and information so as to gain a preliminary understanding of Clacton-on-Sea and its community, to help prepare and inform the approach for community engagement activity.
- 4.1.9. It is noted that the findings of the Community Insights Report align with the data analysis presented in Chapter 3 of this Equality Impact Assessment report, noting several trends particularly relevant to groups with Protected Characteristics relating to age and disability, including long term health conditions. In addition, other trends relate to non-protected characteristics including deprivation, skills and employment.
- 4.1.10. Key findings of the Community Insights Report are shown below:
- There are 53,208 people living in Clacton-on-Sea
 - Elderly population (29.8% aged 65+ compared to the East of England Average of 19.6%)
 - 67.7% own their home, 22.8% private renters, 9.5% social tenants
 - 21% of children aged 0-19 are in relative low-income families in Clacton-on-Sea compared with 14% across East of England
 - 27% of people have a limiting long-term illness in Clacton-on-Sea compared with 17% across East of England
 - 31% of people are physically inactive in Clacton-on-Sea compared with 23% across East of England
 - 30% of people have no qualifications in Clacton-on-Sea compared with 18% across East of England
 - 23% people aged 16-74 are in full-time employment in Clacton-on-Sea compared with 35% across East of England
 - 25% of households have no car in Clacton-on-Sea compared with 17% across East of England; and
 - The % of people 'satisfied with their neighbourhood' (78.7%) is lower than the average across East of England (83.1%)⁴⁸.

Accessibility and inclusion

- 4.1.11. In order to better understand the community of Clacton-on-Sea, the stakeholder mapping incorporated an extensive review of local community groups.
- 4.1.12. This exercise was undertaken in an effort to ensure that the engagement was able to reach a broad range of representative audiences, including groups with Protected Characteristics:
- Varied age groups including children and young people
 - Varied circumstances including students, workers and commuters

⁴⁸ HACT (2023), Community Insights Report, Clacton-on-Sea

- Carers and single parents
- Ethnic groups
- Religious groups
- Digital and physical access
- Deaf and hard of hearing
- Visual impairments
- Wheelchair users
- Cane users and other equipment and adaptation requirements
- Language
- Neurodivergent audiences including dyslexia, dyscalculia, autism, ADHD and others; and
- LGBTQ+ identities.

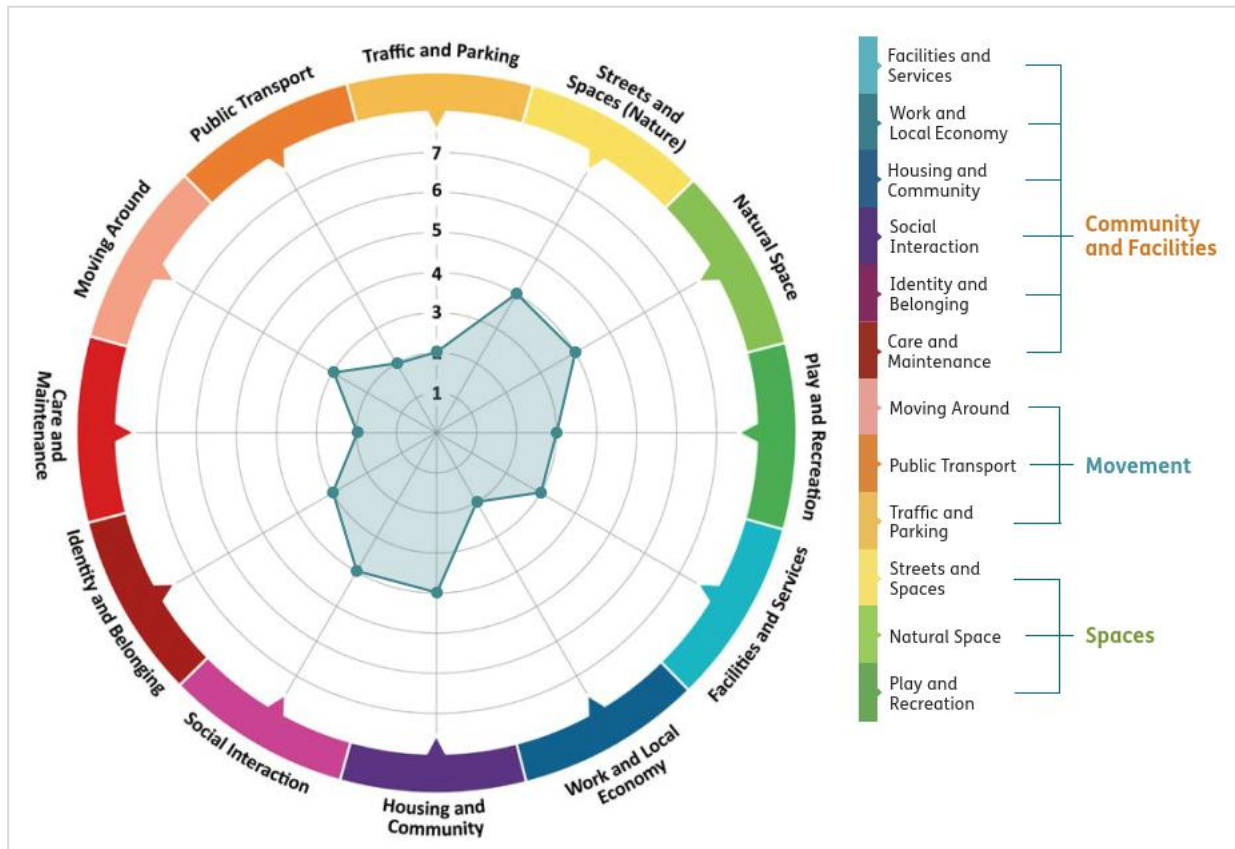
4.1.13. Engagement was planned in a way so as to help ensure successful engagement with a wide audience. Several types of engagement activities were organised, including in-person events, a project website, using accessible language and incorporated planning for inclusive events and inclusive writing.

Place-Based Indicators

- 4.1.14. The approach to community engagement has incorporated guidance on creating locally relevant 'Place-Based Indicators' (PBI).
- 4.1.15. PBIs are informed by community engagement and are locally agreed, defined issues and opportunities that impact on a place over time. The creation and measurement of the PBIs is informed by a combination of statistical data and subjective opinions and feeling. PBI's are a pathway into understanding and defining local needs and opportunities for the wider area, some of which the Hartley Gardens proposal can begin to make a positive contribution towards.
- 4.1.16. The PBI process is integral to identifying locally relevant social value measures.
- 4.1.17. During Stage 1, feedback was gathered from the community so as to understand local needs and opportunities. The Place Standard Tool⁴⁹ was used to ask participants questions to rate each of 14 themes, on a scale from 1 to 7, in which a score of 7 denotes a high priority.
- 4.1.18. The following figure presents the findings from community feedback, depicting the priority themes among Clacton-on-Sea residents are focused on the themes Streets and Spaces; Natural Space; Housing and Community and Social Interaction.

⁴⁹ Scottish Government, Our Place, Place Standard Tool, accessed at: [Place Standard tool | Our Place](#)

Figure 4-1 - Outputs of Place Standard Tool, Hartley Gardens



Community engagement findings

- 4.1.19. During Stage 1: Evidence Gathering, public engagement events were held to ensure that the development process captured feedback from a broad perspective, including groups with Protected Characteristics.
- 4.1.20. Feedback was gathered through a range of activities including online workshops, public exhibition and an online survey. The community engagement activity has focused on establishing relationships with the local community and stakeholders, listening to local perspectives, gathering feedback on the identified constraints and opportunities, and gaining a better understanding of the local needs and aspirations.
- 4.1.21. The following priorities were identified during the Stage 1 community engagement activity:

Community and Facilities

- New facilities delivered onsite must provide for the wider community and be delivered in the early phases of the development.
- Health facilities were a top priority for residents, followed by schools.
- Employment and training opportunities should be maximised both through the development process and land uses.
- The Neighbourhood Centre should not compete with the Town Centre, and efforts should be made to improve town centre offerings.
- House size should be large enough for families.

Movement

- Congestion within the local area should be fully considered, including the existing highway network and key junctions. Public transport within the area should be made more frequent and reliable.
- The active travel network should be improved, particularly across the A133 and routes to the town centre, with an emphasis on improving commuter traffic.
- Adequate parking should be provided, including parking for personal and commercial vehicles, and be conveniently located.

Spaces

- There should be flexible, multi-use open spaces prioritising children's play space, along with space for wildlife.
- Pickers Ditch should be an open space focal point connecting other green spaces, and possibly a nature reserve.
- There should be more street trees and a gap maintained between Little Clacton and the development.
- Provide adequate and enjoyable rest stops in spaces and routes.

Other Design Priorities

- Retain existing landscape features throughout the development and integrate the seaside character of the town into the identity of the development.

Spatial Framework development

- 4.1.22. This section provides a summary of the masterplanning process and how this has incorporated feedback from community engagement.

Hartley Gardens vision

- 4.1.23. Crucial to the development of the Spatial Framework is the underpinning vision. The SPD states the vision for Hartley Gardens includes emphasis on a 'healthy' and 'inclusive' sustainable urban development, therefore embedding a broad appreciation for different societal groups, including those with Protected Characteristics. The vision statement is as follows:⁵⁰

Hartley Gardens will be a healthy, inclusive, and thriving sustainable urban extension for Clacton-on-Sea. It will epitomise the seaside character of the town with the landscape qualities of the hinterland, while having its own strong and distinctive character, form and identity. This sustainable urban extension will be well connected and integrated into the wider town, offering a dynamic and thriving place where new and existing residents can enjoy easy access to Clacton-on-Sea's picturesque coastline and vibrant community.

Hartley Gardens will be a neighbourhood with high-quality new homes in well-designed places, embedding principles of healthy living. It will feature sustainable homes and places, maximising their positive contribution to the natural environment and minimising their environmental impact. Those who live there will enjoy affordable, attractive and energy efficient homes within a leafy and walkable setting that is closely integrated with extensive green spaces including new parks, play

⁵⁰ Hartley Gardens Supplementary Planning Document

areas and landscaped spaces. By embracing and enhancing the local water network and ecological habitats, Hartley Gardens will foster a connection between residents and the natural environment, inspiring and enriching daily life. This will be supported by a range of community facilities including a school, local shopping facilities and employment opportunities.

Hartley Gardens will be a vibrant place that people can be proud of.

Spatial Framework development

- 4.1.24. As set out in further detail in Chapter 3, Clacton-on-Sea is one of the most disadvantaged areas in England. The local area faces challenges with high rates of disability and long-term health problems, both physical and mental health. The approach to masterplanning recognised the opportunity for the Hartley Gardens development to be designed and delivered in a way to consider how the impact and influence of the development will provide benefits for all local communities, vulnerable groups and those with protected characteristics.
- 4.1.25. The Spatial Framework for the Hartley Gardens has been designed to respond to the needs and aspirations of the local context and local community.
- 4.1.26. The below provides a summary of key aspects of the scheme design and provides analysis, findings from community engagement and considerations of ways in which groups with Protected Characteristics may be impacted. Chapter 5 provides a full Equality Impact Assessment in line with TDC's guidance.

New homes

Relevant Protected Characteristics:

- Protected Characteristic 1: Age
- Protected Characteristic 2: Disability

- 4.1.27. The Hartley Gardens site has the potential to deliver approximately 1,870 homes. At this stage the details of unit mix, or affordable housing has not been agreed. The aim is to be policy compliant and explore opportunities for non-standard housing, such as that for key workers or retirement homes, based on local demand.
- 4.1.28. During the Stage 1 engagement, the community highlighted the importance of affordable homes for local people and a mix of tenures.
- 4.1.29. The increase in affordable housing will advance equality of opportunity for groups with a Protected Characteristic and benefit people with priority for affordable housing, both social and intermediate, that are more likely to have protected characteristics, particularly for social housing.
- 4.1.30. During the Stage 1 engagement, the community reflected on the population of Clacton-on-Sea, noting that Hartley Gardens can provide age-appropriate design, therefore supporting accessibility and adaptability. The population aged 65+ accounts for 29.8% of the local population, a far proportion than the East of England average, at 19.6%. There is an opportunity, therefore, for the Hartley Gardens scheme to provide retirement homes that would support the needs of older people.
- 4.1.31. Hartley Gardens will deliver new homes, and presents an ambition for energy efficient homes. New homes typically require less energy to heat and therefore are expected to reduce residents' heating bills. 17.7% of households in Clacton-on-Sea are living in Fuel Poverty- a higher rate than the East

of England, at 12.5%⁵¹. Energy efficient homes could benefit multiple groups including those in lower income or single households as well as those more vulnerable to heating charges such as older people.

- 4.1.32. The emerging proposals for Hartley Gardens do not yet indicate if a proportion of new homes will be fully wheelchair accessible. This would be of particular benefit for people with disabilities and health issues, which affects local people in Tendring at a higher rate than regional trends, as well as provide a benefit for older people, which comprise a higher proportion of the age profile of local residents.

Open spaces

- 4.1.33. Relevant Protected Characteristics:

- Protected Characteristic 1: Age
- Protected Characteristic 2: Disability
- Protected Characteristic 3: Gender (sex)
- Protected Characteristic 4: Gender reassignment
- Protected Characteristic 5: Marriage and civil partnership
- Protected Characteristic 6: Pregnancy and maternity
- Protected Characteristic 7: Race/ethnicity
- Protected Characteristic 8: Religion and belief, including non-belief
- Protected Characteristic 9: Sexual orientation

- 4.1.34. The emerging Spatial Framework includes new Public Open Space, including sport pitches and playing fields. During the Stage 1 engagement, the community provided feedback highlighting the potential for early delivery of green spaces to serve the existing residents.

- 4.1.35. Well-designed open spaces create opportunities for recreation and support the formation of social networks, which in turn can help to improve health, wellbeing, and community cohesion. Safe and accessible spaces should cater to the needs of all people, and provide places where people of different ages, sexes, ethnicities, and abilities can enjoy together.

- 4.1.36. Several vulnerable groups, including older people; those with disabilities, physical and mental health and neurodiverse groups; young children; pregnancy and maternity groups; and those from low-income communities, may rely on various public and open spaces to be able to have social interactions and exercise and therefore the provision of open space can support feelings of safety, actual safety and security and inclusive access.

- 4.1.37. A well-designed public realm can help to promote walking and healthier active transport modes and improve air quality. Disabled and elderly people are likely to particularly benefit from inclusive access improvements, enabling them to share the benefits (such as physical and mental health benefits) of the Hartley Gardens development. Other groups may also particularly benefit from access, safety and security improvements, in relation to needs /priorities associated with their protected characteristics.

- 4.1.38. The Clacton-on-Sea area has higher levels of crime rates, with 'All Crime' rates higher at 116.1 per 1,000 population compared to the East of England average of 89.6 per 1,000 population; and anti-social behaviour incidents slightly higher in Clacton-on-Sea at 15.7 per 1,000 population compared

⁵¹ Households living in 'Fuel Poverty' Department for Business, Energy and Industrial Strategy (2021)

to the East of England average of 13.9 per 1,000 population⁵². Levels of crime can be in part been attributed to the urban environment. The opportunity for some forms of crime can be reduced through well thought-out approaches to ‘designing out crime’.

- 4.1.39. A well-designed open space and public realm, for instance using street lighting, well connected public realm, designing in viewpoints, can support groups with protected characteristics that are more vulnerable to safety and security issues including children, women (including pregnant women), older people, people with disabilities, young people, ethnic minority groups and people from the LGBTQ+ community.

A focus on inclusive spaces and places for girls and young people

- 4.1.40. Relevant Protected Characteristics:

- Protected Characteristic 1: Age
- Protected Characteristic 3: Gender (sex)

- 4.1.41. Particularly relevant to Protected Characteristics relating to sex (gender) and age, open spaces will be designed to be safe, inclusive and will create Spaces for Girls. ‘*Inclusive spaces and places for girls and young people*’ (June 2023) will inform the design of open spaces and play areas to integrate activities and facilities which are tailored to the needs of young and teenage-age girls and could include:

- Social seating
- Walking loops which are visually open and are safe
- Play equipment which motivate teenage girls to be active
- Gym equipment arranged more socially; and
- Public toilets.

Community facilities and social infrastructure

- 4.1.42. Relevant Protected Characteristics:

- Protected Characteristic 1: Age
- Protected Characteristic 2: Disability
- Protected Characteristic 6: Pregnancy and maternity

- 4.1.43. The mix of community amenities including a Neighbourhood Centre, with primary and early years education provision create opportunities for the new community to meet and form social networks between diverse groups. The Spatial Framework strategy is for the primary school provision to be located next to the pedestrian realm which links with footways/cycle rather than a conventional car dominated street.
- 4.1.44. The school will have visual and physical connections to the local centre, public square, and neighbourhood park, early years play areas, soft play and MUGA.
- 4.1.45. During the Stage 1 engagement, the community highlighted community facilities and social infrastructure as a priority, particularly early years and primary education provision, as well as healthcare. The engagement findings also noted the community’s overall preference for the

⁵² Police (March 2022- March 2023), Recorded crime offences

Neighbourhood Centre to overlook a larger green space, though some preferred a more compact centre set around a village square.

Active travel and movement

4.1.46. Relevant Protected Characteristics:

- Protected Characteristic 1: Age
- Protected Characteristic 2: Disability
- Protected Characteristic 6: Pregnancy and maternity

4.1.47. During Stage 1 engagement, the community provided feedback that indicated the priority for streets to be multi-functional, supporting walking and cycling and public transport, alongside cars. The emerging Spatial Framework for the Hartley Gardens scheme is to support the improvement of the active travel network, and the consultation activity so far has shown that there is significant support from the votes online and in person, for good walking and cycling connections and the movement concept.

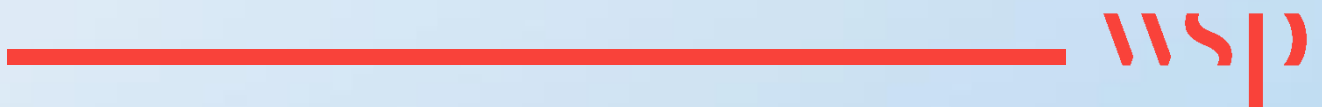
4.1.48. Promoting active travel through walking and cycling, and scootering can create benefits that can be shared by groups with protected characteristics through an improved environment, better air quality, increased safety and more natural surveillance resulting in improved security. However, increased cycling could be dangerous for older and disabled people living in the area within shared pedestrian/cycle paths and crossing facilities. It can be considered that some forms of active travel, such as e-scooters and bikes, could be prohibited in the areas of high footfall such as the Neighbourhood Centre, so that older people and those who are more vulnerable can enjoy open space safely.

4.1.49. There is a well evidenced link between the influence that car-based developments have on health outcomes, which are particularly relevant to children and young people and older people, and those with disabilities and long-term health problems. Dependencies on cars can reduce the preponderance of active lifestyles (physical health); as well as reduce opportunities for social interaction and sense of community (mental health).

4.1.50. The Hartley Gardens development, therefore, is to include cycle and car parking which will be well integrated and flexible, to accommodate potential changes in travel patterns, car ownership and lifestyle changes. The intention is to support the future residents to reduce car-dependency and to support active forms of movement. The high rates of disability in Clacton-on-Sea area, however, may result in the design of the Spatial Framework taking into account that a higher-than-average proportion of future residents may require disabled parking access, to support those with mobility impairments. During Stage 1 engagement, the community provided feedback noting the importance of adequate car parking, for both residents and commercial vehicles.

5

EQUALITY IMPACT ASSESSMENT OF HARTLEY GARDENS SPD



5 EQUALITY IMPACT ASSESSMENT OF HARTLEY GARDENS SPD

- 5.1.1. This structure of this chapter incorporates TDC's Equality Impact Assessment template, which was provided to WSP for the purposes of this assessment⁵³.

5.2 EQUALITY IMPACT ASSESSMENT AND APPRAISAL OF HARTLEY GARDENS SPD

Approach to assessment criteria

- 5.2.1. The structure of the Equality Impact Assessment is based on the SPD site-wide Development Principles, based on the National Design Guide⁵⁴.
- 5.2.2. The Development Principles have been informed by a process which has included the assessment of the Site's constraints and opportunities and engagement with the community and key stakeholders. As set out in the SPD, the Development Principles will underpin the delivery of the Vision and Objectives for the Site, to ensure comprehensive development and create a new neighbourhood with a coherent identity.
- 5.2.3. The Development Principles defined as:
- **Context and Identity:** Context is the location of the development and the attributes of its immediate, local and regional surroundings. The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them.
 - **Built Form:** Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics. Together they create the built environment and contribute to its character and sense of place.
 - **Movement:** Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy.
 - **Nature:** Nature contributes to the quality of a place, and to people's quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.
 - **Public Spaces:** The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements. These include

⁵³ Provided by TDC to WSP, April 2025

⁵⁴ National Design Guide, 2011

areas allocated to different users – cars, cyclists and pedestrians –for different purposes such as movement or parking, hard and soft surfaces, street furniture, lighting, signage and public art.

- **Uses:** Sustainable places include a mix of uses that support everyday activities, including to live, work and play. Well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities.
- **Homes and Buildings:** Well-designed homes and buildings are functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them.
- **Resources and Lifespan:** Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change. It identifies measures to achieve mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.

Approach to assessment of impacts

5.2.4. Based on TDC's Equality Impact Assessment policy⁵⁵, this assessment incorporates the following definitions of potential impacts:

- **Positive** - An impact that will benefit an equality target group is a positive impact. This could improve equal opportunities or community cohesion. There may also be a differential impact, where the positive impact on one particular group is likely to be greater than on another. For example, a health programme targeting Chinese residents would have a positive differential impact on Chinese people compared to other ethnic groups but it would not have a negative impact on other groups or individuals with any of the protected characteristics.
- **Neutral** - A neutral impact where there is no likely change and therefore no potential impact on any groups or individuals with any of the protected characteristics
- **Negative** - A negative or adverse impact is when the impact of an activity could disadvantage individuals or one or more of the groups with protected characteristics. This could be differential, where the negative impact on one group is likely to be bigger than on another. For example, if an event is held in a building with no access for people with mobility difficulties, this could have a negative or adverse impact on attendees who have mobility difficulties, (such as wheelchair users, people with pushchairs or people with mobility aids)⁵⁶.

⁵⁵ TDC (2022), Public Sector Equality Duty and Equality Impact Assessment (EIA) Policy, accessed at: <https://legacy.tendringdc.gov.uk/sites/default/files/documents/TED/Documents/TDC%20Equality%20Impact%20Assessment%20Policy%20and%20Guidance%20May%202022%20-%20FINAL.pdf>

⁵⁶ Ibid

Assessment of potential impacts

- 5.2.5. The potential impacts on groups with Protected Characteristics incorporate both differential and disproportionate effects:
- **Differential effects:** Differential effects occur where people with protected characteristics are likely to be affected in a different way to other members of the general population. This may be because groups have specific needs or are more susceptible to the effect due to their protected characteristics, compared to the rest of the general population. Differential effects are identified irrespective of the number of people affected.
 - **Disproportionate effects:** Disproportionate effects occur where there is likely to be a comparatively greater effect on a group than on other sections of the general population. A disproportionate equality impact may arise when the impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location.

Protected Characteristics Assessment Matrix

- 5.2.6. The following table (Table 5-2) presents the Equality Impact Assessment of the SPD.

Table 5-1 – Equality Impact Assessment Matrix

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
Context and Identity	<p>Context is the location of the development and the attributes of its immediate, local and regional surroundings.</p> <p>The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them.</p>	SPL 3 (Sustainable Design), HP 3 (Green Infrastructure), LP 3 (Housing Density and Standards), LP 4 (Housing Layout)	<p>This Development Principle reflects the Spatial Framework, with four distinct character areas:</p> <ul style="list-style-type: none"> Northern Character Area Central Character Area Eastern Gateway Character Area Southern Character Area <p>Each Character Area will be distinct and therefore the demographic and socio-economic profile of each residential community will likely to differ, however there are common features. All character areas include residential uses and open space provision. Community facilities are primarily located in the Northern Character Area and Central Character Area.</p> <p>Planning applications must be supported by a site-analysis and character assessment setting out how development proposals respond to the existing site character and context to create a place of character with a strong sense of identity. The SPD states that all uses must be accessible for all, with walking and wheeling prioritised.</p>	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
Built Form	Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive place to live, work and visit, rather than their individual characteristics. Together they create the built environment and contribute to its character and sense of place.	SPL 3 (Sustainable Design), LP 4 (Housing Layout), Essex Design Guide (2018)	<p>The SPD places emphasis on density, character areas and frontages. Of particular relevance is reference to safety.</p> <p>The SPD states that proposals must consider Secure by Design principles to address community concerns around safety and anti-social behaviour and this should feed into pre-application planning discussions.</p> <p>Secured by Design can support appropriate lighting, natural surveillance, safe walking and wheeling routes, clearly defined private and public spaces, spaces that encourage positive community activities and spaces that are easy to maintain informing the design process. This is applicable to, and can positively impact, all groups with Protected Characteristics.</p> <p>Fear of crime, as well as crime itself, can deter people from using good-quality public spaces. Children and young people, for example, are often prevented from using parks, squares, and streets because of their parents' fears about crime, whilst other groups including older people, those with disabilities, and other groups of different race, religion or belief, sex, gender and sexual orientation can also face particular concerns. Fear of violence and crime in outdoor</p>	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
			areas can also deter adult people from engaging in physical activity in public spaces. The benefits of ensuring security is considered in the design and operation of the public realm are therefore considered to benefit all groups.									
Movement	Patterns of movement for people are integral to well-designed places. They include walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport. They contribute to making high quality places for people to enjoy.	SPL 3 (Sustainable Design) CP 1 (Sustainable Transport and Accessibility) CP 2 (Improving the Transport Network)	<p>Active travel, including walking and wheeling is placed at the top of the travel hierarchy. Development layouts should consider the needs of pedestrians first.</p> <p>The development of the proposals for Hartley Gardens has incorporated the specific needs and opportunities for women and girls, based on the 'Inclusive spaces and places for girls and young people' guidance. The purpose is to aim to support a positive impact in terms of providing safe, well-lit routes to encourage use by women and girls.</p> <p>The SPD references car parking standards including Blue Badge parking.</p> <p>There is a well evidenced link between the influence that car-based developments have on health outcomes, which are particularly relevant to children and young people and older people, and those with disabilities and long-term health problems. Dependencies on cars can reduce the</p>	Positive	Positive	Positive	Neutral	Neutral	Positive	Neutral	Neutral	Neutral

Criteria	Criteria Description, as presented in SPD	Relevant Tendring Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
			<p>preponderance of active lifestyles (physical health); as well as reduce opportunities for social interaction and sense of community (mental health).</p> <p>The SPD places emphasis on access between homes and new schools on-site at Hartley Gardens with the focus on promoting safe walking routes and active travel for school age pupils.</p> <p>Residents in Clacton-on-Sea have higher rates of disability and long-term health conditions, therefore design principles that seek to support and promote accessible movement could support residents of older age groups and those with health conditions.</p> <p>The Hartley Gardens development, therefore, is to include cycle and car parking which will be well integrated and flexible, to accommodate potential changes in travel patterns, car ownership and lifestyle changes.</p> <p>Promoting active travel through walking and cycling, and scootering can create benefits that can be shared by groups with protected characteristics through an improved environment, better air quality, increased safety and more</p>									

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
			natural surveillance resulting in improved security.									
Nature	Nature contributes to the quality of a place, and to people's quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.	<p>PPL 4 (Biodiversity and Geodiversity)</p> <p>PPL 6 (Strategic Green Gaps), Natural England Green Infrastructure Framework (2023)</p> <p>Building with Nature Green Infrastructure Standards</p> <p>ECC Green Infrastructure Strategy</p> <p>ECC Local Nature Recovery Strategy</p>	<p>Hartley Gardens will deliver public open space including Pickers Park; landscaped SuDS which can include equipped play and play areas; Western Park, which will include playing pitches and sports pavilion; and a Neighbourhood Park which will include destination play spaces.</p> <p>Well-designed open spaces create opportunities for recreation and support the formation of social networks, which in turn can help to improve health, wellbeing, and community cohesion. Safe and accessible spaces can provide places where people of different ages, sexes, ethnicities, and abilities can enjoy together.</p> <p>Several vulnerable groups, including younger and older people; those with disabilities and health conditions; pregnancy and maternity groups; and those from low-income communities, may be positively impacted, as public and open spaces support social interactions and offer opportunity for exercise. The approach for the Spatial Framework for Hartley Gardens has incorporated thinking on supporting safety for women and girls,</p>	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
			<p>based on the guidance 'Inclusive spaces and places for girls and young people'.</p> <p>The provision of open space can support feelings of safety, actual safety and security and inclusive access.</p>									
Public Spaces	<p>The quality of the spaces between buildings is as important as the buildings themselves. Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various</p>	<p>SPL 3 (Sustainable Design)</p> <p>Essex Design Guide (2018)</p>	<p>This SPD Development Principle sets out detail with regard to play areas, with a range of play areas targeted for specific age groups.</p> <p>The SPD states that public spaces will be designed to be safe, inclusive and should integrate activities and facilities which meet the requirements of those with specific needs.</p> <p>A well-designed public realm can help to promote walking and healthier active transport modes and improve air quality. Disabled and elderly people are likely to particularly benefit from inclusive access improvements, enabling them to share the benefits (such as physical and mental health benefits) of the Hartley Gardens development. Other groups may also particularly benefit from access, safety and security improvements, in relation to needs /priorities associated with their protected characteristics.</p>	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
	elements. These include areas allocated to different users – cars, cyclists and pedestrians –for different purposes such as movement or parking, hard and soft surfaces, street furniture, lighting, signage and public art.		<p>The Clacton-on-Sea area has higher levels of crime rates, with ‘All Crime’ rates higher at 116,1 per 1,000 population compared to the East of England average of 89.6 per 1,000 population; and anti-social behaviour incidents slightly higher in Clacton-on-Sea at 15.7 per 1,000 population compared to the East of England average of 13.9 per 1,000 population. Levels of crime can be in part been attributed to the urban environment. The opportunity for some forms of crime can be reduced through well thought-out approaches to ‘designing out crime’.</p> <p>A well designed open space and public realm, for instance using street lighting, well connected public realm, designing in viewpoints, can support groups with protected characteristics that are more vulnerable to safety and security issues including younger people, women (including pregnant women), older people, people with disabilities, young people, ethnic minority groups and people from the LGBTQ+ community. The approach for the Spatial Framework for Hartley Gardens has incorporated thinking on supporting safety for women and girls, based on the guidance ‘Inclusive spaces and places for girls and young people’.</p>									

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
Uses	Sustainable places include a mix of uses that support everyday activities, including to live, work and play. Well-designed neighbourhoods need to include an integrated mix of tenures and housing types that reflect local housing need and market demand. They are designed to be inclusive and to meet the changing needs of people of different ages and abilities.	LP 1 (Housing Supply), LP 2 (Housing Choice), LP 5 (Affordable Housing), HP 2 (Community Facilities), PP 1 (New Retail Development), PP 3 (Village and Neighbourhood Centres), PP 6 (Employment Sites), PP 12 (Improving Education and Skills)	<p><u>Residential uses</u></p> <p>The Hartley Gardens site has the capacity to deliver approximately 1,870 homes. The quantum, tenure and mix of housing will provide choice and meet current and future need in line with Policies LPS2 2, LPS2 5 and SAMU2. The detailed mix of housing types for each planning application will be determined on a case-by-case basis, informed by prevailing need, including that identified in TDC's latest Strategic Housing Market Assessment. All housing will be designed 'tenure blind' and affordable housing will be secured as part of an appropriate legal agreement.</p> <p>The provision of affordable housing will advance equality of opportunity for groups with a protected characteristic and benefit people with priority for affordable housing.</p> <p>Specific groups with high needs for access to housing and high representation amongst the local population include young adults and older people. The population aged 65+ accounts for 29.8% of the local population, a higher proportion than the East of England average, at 19.6%. There is an opportunity, therefore, for the Hartley</p>	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
			Gardens scheme to provide homes that would support the needs of older people.									
			<p><u>Social infrastructure</u></p> <p>The Neighbourhood Centre is proposed to be the focal point of the development. The Neighbourhood Centre will locate community facilities including a sports pavilion, retail amenities, primary school and early years provision.</p> <p>The baseline assessment has found that there are significant health and disability disadvantages, and health-related deprivation in Clacton-on-Sea. 27% of people have a limiting long-term illness in Clacton-on-Sea compared with 17% across East of England.</p> <p>The provision of new on-site social infrastructure can provide important places of social connection and promote better health and wellbeing for many groups with protected characteristics; supporting social cohesion.</p>	Positive	Positive	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral
Homes and Buildings	Well-designed homes and buildings are	SPL 3 (Sustainable Design), LP 3	The SPD sets out that Design Codes must follow the principles of the SPD and will set out specific requirements including adherence to Nationally	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
	functional, accessible and sustainable. They provide internal environments and associated external spaces that support the health and well-being of their users and all who experience them.	(Housing Density and Standards), PPL 10 (Renewable Energy Generation and Energy Efficient Measures), Essex Design Guide (2018)	<p>Described Space Standards, design of frontages and streetscapes, guidance on incorporating passive design features, guidance on storage and waste collection.</p> <p>The SPD supports accessibility of new homes, which could include wheelchair accessibility and flexibility to adapt homes, such as addition of ramps. This is particularly relevant for residents with disabilities and health conditions as well as older people. A larger proportion of local residents in Tending have long-term health conditions, compared to regional trends, and older people comprise a higher proportion of the age profile of local residents.</p>									
Resources and Lifespan	Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change. It	PPL 10 (Renewable Energy Generation and Energy Efficient Measures), Essex Design Guide (2018)	<p>The SPD focuses on resource efficiency, stating that the orientation and passive design principles, minimise carbon release and incorporate low and zero carbon technologies.</p> <p>New homes that meet better thermal comfort ratings and energy efficiency standards will reduce monthly bills for energy and will further assist in concerns relating to financial pressures upon elderly people who are no longer working. The improved thermal comfort of the homes will</p>	Positive	Positive	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral

Criteria	Criteria Description, as presented in SPD	Relevant Tending Local Plan policies	Potential Impact	Age	Disability	Gender (sex)	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race and ethnicity	Religion or belief	Sexual orientation
	<p>identifies measures to achieve:</p> <p>Mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and</p> <p>Adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.</p>		<p>also have beneficial health impacts to people across all ages, including children.</p> <p>New homes typically require less energy to heat and therefore are expected to reduce residents' heating bills. 17.7% of households in Clacton-on-Sea are living in Fuel Poverty - a higher rate than the East of England, at 12.5%⁵⁷. Energy efficient homes could benefit multiple groups including those in lower income or single households as well as those more vulnerable to heating charges such as older people.</p>									

⁵⁷ Households living in 'Fuel Poverty' Department for Business, Energy and Industrial Strategy (2021)

5.3 CONCLUSION

- 5.3.1. The Equality Impact Assessment has assessed the potential for the Hartley Gardens SPD to disproportionately impact groups of Protected Characteristics, as identified within Section 149 of the Equality Act 2010.
- 5.3.2. The Equality Impact Assessment shows that the SPD effects range from no effect to significant positive effects on groups with Protected Characteristics.
- 5.3.3. The SPD for Hartley Gardens aims to deliver a new community, including new homes, public open space, community infrastructure and employment land, incorporating design principles that promote placemaking, safety, energy efficiency and accessibility.
- 5.3.4. The EIA has demonstrated that persons with Protected Characteristics have been considered in the development of the proposals and the delivery of the consultation and wider planning process. This information is presented to TDC for consideration in their discharge of the PSED in the determination of the SPD.



8 First Street
Manchester
M15 4RP

wsp.com

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