

Dover Leisure Centre Cabinet Report 20th September 2016

Annex 2
Equality Impact Assessment

CUSTOMER ACCESS REVIEW

Department Environment and Corporate Assets	Division	Officers involved in the assessment Principal Infrastructure and Delivery Officer
Name of the policy or service provision to be assessed: Provision indoor leisure facilities in Dover	Date of assessment: 11 August 2016	Is this a new, revised or existing policy or service provision? Revision of service provision
<p>1. Describe the item you are assessing and the outcomes you want from it? The proposed project is to replace the existing Dover Leisure Centre with a new facility at a different location. The intended outcomes include increasing levels of physical activity amongst residents of the district by improving the provision of indoor leisure facilities in the Dover urban area.</p>		
<p>2. Who is intended to benefit – who is it aimed at? The project is aimed at everyone who currently uses the leisure centre and anyone who potentially would use it, if the standards and range of activities were improved. Current and potential users include those who participate regularly in formal sport, e.g. as part of a club, and those who use sport and leisure facilities ad hoc on a pay-and-play basis.</p>		
<p>3. Do the anticipated outcomes meet or hinder any other things that the authority is doing? The project was developed in parallel with the Indoor Sports Facility Strategy, which was adopted in July 2016, and if delivered it will achieve several key actions identified within the strategy.</p>		
<p>4. Who defined the policy, function or service provision and who are the main stakeholders? The district's Indoor Sports Facility Strategy was developed with reference to numerous national and local policies and strategies, as described in Chapter 3 of that document. Initially a draft was developed in consultation with key stakeholders such as Sport England, national governing bodies of sport, sporting networks, facility providers and local sports clubs. A draft document was then then subject to full public consultation, which was publicised by various means including direct contact with the key stakeholders already mentioned and as well as the town and parish councils. All comments received were reported to Cabinet and responses provided. The strategy was revised in response to those comments as appropriate, and adopted by the Council.</p>		
<p>5. Who implements it and who is responsible for its delivery? The Director of Environment and Corporate Assets is responsible for delivering the new leisure centre, in collaboration with various departments, including Finance.</p>		
<p>6. What do you already know about people you expect to benefit or people who already benefit? What consultation have you done and how are you going to monitor feedback?</p>		

The project proposal was informed by a range of evidence that supports the case for improved sports facilities in the District, which are reported in detail in the adopted Indoor Sports Facility Strategy. For example the national Active People Survey indicates that the number of people in this district participating in at least one 30 minute session of moderate intensity sport per week is lower than the national average, and non-participation in sport by those aged 14+ compares poorly to the regional and national averages. According to Public Health England (2014) there are c24,000 physically inactive adults in the District. This is defined as adults (16+) doing less than 30 minutes moderate intensity physical activity per week, which at a rate of 26.3% is higher than the South East rate of 25.4. Public Health England figures also indicate that 20.2% of children in year 6 are classed as obese, which is higher than the regional and national rates of 16.0% and 18.9% respectively.

A feasibility study of the proposals for a new leisure centre indicated that it would attract many more visits than the existing centre, and would therefore make a significant contribution to achieving the corporate priority of working towards healthier people and communities.

Sport England has developed a segmentation model of 19 groups, each with a distinct sporting behaviour and attitude. The model was applied to the population of Dover District, which helped to gain an understanding of motivation and perceived barriers to participation relevant to the dominant groups in the district. The needs of smaller segments should not be ignored, but segmentation helps facility providers to make tailored interventions and better understand participation in the context of life stage. For example, one of the largest population groups is retired singles or widowers, predominately female, living in sheltered accommodation (8,200 individuals).

The implications for indoor sports facility arising from this analysis is that the dominant profiles would benefit most from provision of facilities to support keep fit/gym, swimming and football. These findings were taken into account when developing the strategic priorities set out in Chapter 6 of the Indoor Sports Facility Strategy and the delivery proposed new sports centre would meet several of those objectives.

Other sources of information include an audit of the current supply of current indoor sports facilities and an investigation into the level of demand. These data were analysed using Sport England's Facilities Planning Model, use current and future population estimates to identify suitable levels of facility provision to meet local needs both now and in the future. The results obtained were benchmarked against similar authorities using the 'Nearest Neighbour' model, which was developed by the Chartered Institute of Public Finance and Accountancy. Furthermore, Sport England defined catchment areas were taken into account when developing strategic priorities for the adopted Indoor Sports Facility Strategy.

As described in Section 4 above, the Indoor Sports Facility Strategy was informed by consultation with key stakeholders and then subject to public consultation. The proposals for a new leisure centre in Whitfield were developed in parallel with the Indoor Sports Facility Strategy, and an open public consultation was undertaken on these proposals between 4th and 24th July 2016. The format of the consultation was a series of engagement events combined with an on-line questionnaire. Paper copies of the questionnaire were also available at the events. The consultation was widely promoted by means of advertisements in local papers, the Council's website, social media and posters provided to leisure centres, libraries and council offices. Email alerts were distributed through the Council's Keep me Posted initiative and Your Leisure's customer database. In addition, information boards were displayed at Dover and Tides leisure centres throughout the consultation period.

The consultation events were organised at various locations and times of day to maximise contact with a range of user groups. Representatives from 152 key stakeholders were invited to attend a workshop on 7 July, including all consultees listed in Appendix 1 of

Indoor Sports Facility Strategy plus all primary schools in the district, nineteen representatives from protected characteristic groups and three town societies. Public drop-in sessions were held at Dover Leisure Centre on 14, 16 and 19 July, at Whitfield Farmer's Market on 21 July and the Dover Community Regatta on 23 July. Members of the project team were present at all the consultation events to engage with consultees, answering any queries and encouraging members of the public to feedback their views by completing the questionnaire.

Six hundred and seventy three written responses to the questionnaire were received. The consultation responses have been reviewed, a summary of the results is available from

<http://www.dover.gov.uk/Leisure-Culture-Tourism/Leisure-Facilities/New-Leisure-Centre/New-Leisure-Centre-responses.pdf>

Key issues raised by a significant proportion of consultees are discussed within the body of the Cabinet report. Where appropriate further action has been undertaken or is suggested, for example advice has been obtained from the Amateur Swimming Association regarding swimming pool specification and officers are liaising with key sports club and schools to help increase community use of school facilities.

In addition, comments received that are of importance to groups with protected characteristics are discussed in Section 7 below. This includes relevant issues raised verbally during the drop in sessions, particularly with respect to access by people with disabilities.

7. Taking each strand of equality, is there any differential impact for anyone. Does this adversely affect them? Don't forget, you're not looking for direct discrimination you're looking to see how you can help people access your service. Taking into account your answer to question 7, think about the following protected groups;

- a. **Race** No information relevant to this protected character group was obtained through the consultation, therefore no adverse impact identified.
- b. **Disability** Many of the responses received were supportive of the project, for example 'Access, especially disabled access, to the existing site is poor and the main reason my wife and I don't use it. We would almost certainly use the new site.' (A 'Changing Places' facility is proposed within the changing village) 'Be fantastic for schools in area .especially Whitfieldaspen . We run an after school Disability swim Club , doing it voluntary for 8 years for school hope to carry it on'. 'better access for the disabled I am a support worker for a disabled lad who I bring to use your gym and it's hard for him getting into the leisure centre and gym because the gym is upstairs and he is in a wheelchair' (The gym is on the second floor in the proposed designs, but a lift is specified)

Verbal responses from attendees at the key stakeholder workshop highlighted the importance of the proposed 'Changing Places' facility and wheelchair lift into the main pool in meeting the needs of people with disabilities, but questioned the way in which access to the learner pool would be facilitated.

However, others raised concerns, for example 'It is taking people away from the town centre. I live on the other side of Dover, I am severely disabled, and I don't drive. Dover leisure centre should actually be in Dover. The only exercise I can do is swimming. Now it looks like that too will be taken away.'

- c. **Gender** Some respondents were unhappy with the proposed layout of the wet-side changing, for example 'Do not like the wet side changing village. Would prefer to see 'traditional' male and female changing as per the dry side.' 'Mixed changing rooms for swimming. People hate it. Back to male and female changing please. In Canterbury at Kingsmead it's one of the key things people want changed. Really inhibiting. Not necessary. Have family changing but all else shovel be single sex'.

However, others are in favour of the proposed mixed gender changing village. For example 'I have a son with special needs who is too old to go into the ladies changing room, but cannot manage on his own in the men's. The current family changing is woefully inadequate and I only go down with a special needs group now. If I want to take him swimming at any other time I go to Ashford as they have changing rooms like you are proposing and don't have the queues found at Tides.'

- d. **Age** Some comments raised concerns about the impact of the proposals on certain age groups, for example 'I formerly played badminton and now table tennis. It is very important that these 2 sports are adequately catered for

and available simultaneously because they can both be played by older people. Retired people are more likely to use the leisure centre during the day and their exercise needs are as important as those of other age groups. It is not clear from the plans how much space and available time will be allotted to badminton and table tennis.’ Also ‘We hope senior citizens will be considered a bit in the various programmes.’

A respondent who gave their age as 65+ said ‘I cannot get to Whitfield on foot totally inaccessible for the elderly’. However others in this age group support the proposed site, for example ‘I think the proposed site is perfect and I will look forward to using the pool and café.’ As shown by the results of the survey, although the level of support is very high amongst those aged 65+, it is slightly lower than the overall level of support across all age groups (80% compared to 89% overall).

Twenty-five responses were received from people giving their age as 0-14 years, of which 23 supported the proposals. One of the people who did not support the proposals stated that they would find it more difficult to access, but 10 of the respondents said they would visit more frequently.

- e. **Religion** No information relevant to this protected character group was obtained through the consultation, therefore no adverse impact identified
- f. **Sexual orientation.** No information relevant to this protected character group was obtained through the consultation, therefore no adverse impact identified
- g. **Gender re-assignment** No information relevant to this protected character group was obtained through the consultation, therefore no adverse impact identified
- h. **Pregnancy and Maternity** No information relevant to this protected character group was obtained through the consultation, therefore no adverse impact identified
- i. **Marriage and Civil Partnership** No information relevant to this protected character group was obtained through the consultation, therefore no adverse impact identified

8. If there is nothing you can do about any adverse impact highlighted in question 7, can the reasons be justified?

Should the project proposals be approved, further engagement will be undertaken regarding detailed designs prior to any planning application. The planning consultation will be publicised to groups and individuals who have expressed an interest in the leisure centre project. These actions will help to ensure that, where appropriate, the final design addresses detailed comments already received that are relevant to groups with protected characteristics, for example regarding access to the pool by people with disabilities.

It is unlikely that the designs will move away from the 'changing village' model, even though some respondents are unhappy with this approach because others find it beneficial and all the recently constructed leisure centres visited during the preparation of this proposal use the 'changing village model'. So long as sufficient cubicles are provided privacy can be protected.

A number of consultees were concerned that an out of town centre leisure centre would be less accessible. This may be particularly important to users aged 65+ although the evidence is not clear cut, and there is no evidence to show a differential effect on other user groups with protected characteristics.

Issues of access from the town centre will be addressed through the travel plan that will be prepared to accompany any planning application; this will be reported to Cabinet prior to submission of the planning application. If Cabinet provide authority for a planning application to be submitted, the travel plan will then be subject to consultation as part of the planning process, as described in the Council's adopted Statement of Community Involvement. The National Planning Policy Framework sets out the requirement of a travel plan, including the need to consider the 'existing intensity of transport use and the availability of public transport'. National Planning Policy Guidance states that the purposes of a travel plan include creating accessible connected and inclusive communities and improving health outcomes and quality of life, therefore the needs of all groups with protected characteristics will be considered. The project budget includes provision for possible development contributions towards enhancing public transport links to the new leisure centre, should that be deemed necessary at the time any application is decided.

9. If you've had to make changes because of adverse impact found in Q7, have you made sure these don't have a further adverse effect on any other group?

This has not occurred so far, but it will be important to consider this point when engagement on the detail of the leisure centre design is undertaken.

10. What lessons have been learnt from completing the assessment?

The drop in consultation events were very helpful in encouraging people to participate in the questionnaire.

11. Who will be the owner of the action plan?

The Director of Environment and Corporate Assets

Action Plan to Remedy Areas of Concern

You need to complete this plan with actions that will correct the shortfalls in the review.

Description of Concern	Action Required	Date Due	Responsible Officer (Job Title Only)
Will the learner pool be accessible to those with disabilities?	Engagement with relevant user groups regarding detailed design proposals	Prior to planning application	The Director of Environment and Corporate Assets
Will the changing village have an adverse impact on some protected groups?	Engagement with relevant user groups regarding detailed design proposals	Prior to planning application	The Director of Environment and Corporate Assets
Will the proposed location have an adverse impact on participation by older people (or any other group with protected characteristics)?	Preparation of a travel plan, which will be subject to consultation through the planning process	Prior to planning application	The Director of Environment and Corporate Assets