

Tangmere Strategic Development Location Compulsory Purchase Order Equality Impact Assessment addendum

Project:	Tangmere Strategic Development Location Compulsory Purchase Order: Equality Impact Assessment COVID-19 addendum		
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1 Overview

1.1 Introduction

In February 2020, Mott MacDonald undertook an Equality Impact Assessment (EqIA) for the making of the Chichester District Council (Tangmere) Compulsory Purchase Order 2020 ('the CPO'). The CPO is a key tool in the delivery of housing and other development upon land at Tangmere, referred to within Chichester District Council's ('the Council') Local Plan as the Tangmere Strategic Development Location (TSDL).

Following submission of the EqIA, the Council secured resolution to make use of compulsory purchase powers to enable the TSDL scheme. However, in March 2020, the COVID-19 pandemic resulted in the Council's decision to temporarily suspend work on the CPO. The Council's primary concern was its inability to satisfy legal requirements to have a set of hard copy scheme documents available for public inspection at the Council offices.

In May 2020, in response to the COVID-19 pandemic, the Ministry of Housing, Communities & Local Government (MHCLG) published guidance for acquiring authorities on compulsory purchase matters.¹ The guidance enables Councils to continue with its CPO powers, providing certain protocols are adhered to. As a result, the Council and its development partner (Countryside Properties (UK) Ltd) have determined that it would be appropriate to recommence work on the TSDL CPO.

This report provides a high-level equalities analysis of the recently published government guidance on CPO during the COVID-19 pandemic, acting as an addendum to the previous TSDL EqIA. The report is designed to assist the Council in appropriately considering the guidance, and continue to implement appropriate measures, so that the CPO process remains as accessible and inclusive to all as is possible.

¹ Ministry of Housing, Communities & Local Government (2020): 'Coronavirus (COVID-19): compulsory purchase guidance'. Available at: <https://www.gov.uk/guidance/coronavirus-covid-19-compulsory-purchase-guidance>

1.2 COVID-19 compulsory purchase order guidance

The following table provides an overview of the Government COVID-19 CPO guidance²:

Table 1.1 Government COVID-19 CPO guidance overview

COVID-19 CPO Guidance	Overview
Service of documents	If any documents are required to be 'served' under the Acquisition of Land Act 1981, they must be delivered personally to the designated address, or via post using recorded delivery. In line with current public health guidance, Royal Mail are not capturing customer signatures upon delivery. Instead, the name of the customer in receipt of the document(s) sent using recorded delivery will be logged. This method continues to meet requirements in section 6(1) of the Act.
Time periods for responses	Under the guidance, acquiring authorities are encouraged to consider increasing time periods for people to respond when requesting information about interests in land to be acquired. A longer time frame also ensures there is adequate time to submit objections to CPO, should this be necessary. The extended time frame may be particularly beneficial to those self-isolating as a result of the pandemic and therefore unable to reach a post box.
Making documents available for inspection	<p>Under the Acquisition of Land Act 1981, acquiring authorities must name a place within the locality of the CPO where a copy of the order and map can be inspected. These documents must be available for a CPO after it has been made, and again once it has been confirmed.</p> <p>However, as a result of COVID-19, the Government considers publication of the order and map online by the acquiring authority as sufficiently fulfilling these criteria. To ensure enough notice is provided that a CPO has been made, and to mitigate the risk of prejudicing the interests of those without access to the internet, acquiring authorities should ensure details are provided for individuals to request hard copies of the order and map. Should social distancing restrictions be sufficiently eased, inspection of the order and map should once again be allowed in person via a building or office in the CPO locality.</p> <p>To ensure documents are sufficiently served under the Acquisition of Land Act 1981, the guidance highlights that acquiring authorities may seek alternative addresses (such as email addresses or alternative properties) to serve notices. This is particularly beneficial where qualifying persons might have trouble receiving notices at their primary address, for example where a business is temporarily closed. Acquiring authorities should also consider whether it is appropriate to increase deadlines for CPO objections as a result of the current climate.</p>
Return of documents to acquiring authorities	Where it is necessary for the Planning Casework Unit (PCU) within the MHCLG to return CPO documents to acquiring authorities, and where it is not possible for this to be done electronically, PCU will make contact with the acquiring authority to agree where documents should be sent.
Decisions remitted back to acquiring authorities	Where CPOs are sent back to acquiring authorities, notices should be sent via email and post to the confirming authority. Where possible, decisions will be sent electronically, with hard copies following soon after. However, there may be delays with this process.
Dealing with claimants	<p>Acquiring authorities should act responsibly with both residential and business claimants, particularly with the timing of vesting orders and compensation. In line with the Government's wider guidance on evictions during the COVID-19 pandemic, no undue evictions of residents should take place during this period.</p> <p>The guidance reminds acquiring authorities of section 52 of the Land Compensation Act 1973, and that timely payments are made to claimants. The Act states that an advance payment of compensation must be paid at any time after the compulsory acquisition has been authorised and; must be paid on accordance with the deadlines in section 52(4).</p>

² Ministry of Housing, Communities & Local Government (2020): 'Coronavirus (COVID-19): compulsory purchase guidance'. Available at: <https://www.gov.uk/guidance/coronavirus-covid-19-compulsory-purchase-guidance>

Source: Ministry of Housing, Communities & Local Government, 2020

1.3 Potential equality effects associated with COVID-19 CPO guidance

The above guidance highlights a number of changes to compulsory purchase matters that acquiring authorities must adhere to. From an equalities perspective, the following matters may give rise to effects that are more likely to impact those with characteristics protected under the Equality Act, 2010:

- CPO documentation being made available **online** for inspection;
- The potential for CPO documents to be made available **in person**, should social distancing restrictions be sufficiently eased; and
- The potential for acquiring authorities to **increase time periods for people to respond** when requesting information and when submitting objections to CPO.

Literature that identifies how the above matters may impact protected characteristic groups is explored in section two of this report.

2 Evidence and analysis

The following section considers current experiences and challenges that may arise for different protected characteristic and socio-economic groups as a result of Government COVID-19 CPO guidance.

2.1 Digital access

The Government COVID-19 CPO guidance states that publication of the order and map online by the acquiring authority sufficiently fulfils the criteria under the Acquisition of Land Act 1981.³ However, many protected characteristic groups face digital exclusion, and may therefore experience barriers to accessing CPO documents in this format.

Living in a digital age, where technological advances become increasingly important for connecting with others and accessing information and services, digital inequalities tend to replicate and reinforce existing inequalities by sex, age, race, educational background, geography and disability.⁴ Digitally excluded people can also lack a voice and visibility in the modern world, as government services and democracy increasingly move online.⁵

Research carried out by the Office for National Statistics (ONS) showed that in 2018 there were 5.3 million adults in the UK, or 10% of the adult UK population, who have either never used the internet or have not used it in the last three months. With regards to the South East population, 86% (compared to 79% UK average) have the five basic digital skills⁶ and only 5% of the population have zero basic digital skills.⁷

³ Ministry of Housing, Communities & Local Government (2020): 'Coronavirus (COVID-19): compulsory purchase guidance'. Available at: <https://www.gov.uk/guidance/coronavirus-covid-19-compulsory-purchase-guidance>

⁴ ONS (2019) 'Exploring the UK's digital divide' Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheuksdigitaldivide/2019-03-04>

⁵ Good Thinks Foundation, 'Digital Inclusion' (no date). Available at: <https://www.goodthingsfoundation.org/areas-of-work/digital-inclusion>

⁶ 'The Essential Digital Skills Framework' (2018) defines the skills needed to safely benefit from, participate in and contribute to the digital world of today and the future. These are: communicating; handling information and content; transacting; problem solving; and being safe and legal online.

⁷ ONS (2019) 'Exploring the UK's digital divide' Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheuksdigitaldivide/2019-03-04>

2.1.1 Age: Older people

Evidence suggests that **older people** tend to choose familiar formats, such as newspapers, TV or radio, to access information, and are therefore not as likely as younger people to be users of new technology.⁸ Since 2011, adults over the age of 65 have consistently made up the largest proportion of the adult internet non-users, and over half of all adult internet non-users were over the age of 75 years in 2018. In the same year, 76% of those with zero basic digital skills were aged over 65 years. Similarly, 84% of those over the age of 60 years said that nothing could help them get online, illustrating a lack of inclination particularly prevalent among the older age group.⁹

The ways in which the internet is accessed also varies with age. In 2018, 77% of adults in Great Britain reported accessing internet “on the go” (referring to accessing the internet away from home or work, for example via a smartphone or tablet). However, this proportion declines with age, with 69% of those aged 55 to 64 years accessing the internet on-the-go, and 39% of those over the age of 65 years.¹⁰

Previous research in the UK has identified that the combination of **higher ages and lower social grades** multiplies the level of digital exclusion. People who are both over 65 and from the DE social class¹¹ account for 28% of all people without internet access, a figure four times higher than any other combination.¹²

Although research suggests that older people are one of the most **willing groups to engage** and be a part of their community, and have some of the highest civic and political participation rates,¹³ they are amongst those who are more likely to experience challenges accessing CPO documents online. This group may therefore be disproportionately affected by the recent COVID-19 Government CPO guidance.

2.1.2 Disabled people

Across all age groups, **disabled** adults make up a large proportion of adults who do not use the internet. Evidence shows that in 2018, 23% of disabled adults did not use the internet, compared to just 6% of non-disabled people.¹⁴

A report published by Ofcom has also revealed that 38% of **disabled people** who are not using the internet find that the internet does not interest them, while 5% of those not using the internet felt that their disability prevented them from doing so. In the same report, it is identified that only 53% of disabled people have access to a smartphone, compared with 81% of non-disabled people. For disabled people with internet access, **visually impaired** people are the most likely to experience difficulty whilst using a mobile phone, tablet or accessing websites on the internet.¹⁵

⁸ Age Concern (no date) 'Introducing another World: older people and digital inclusion' Available at: https://www.ageuk.org.uk/Documents/EN-GB/For-professionals/Computers-and-technology/140_0809_introducing_another_world_older_people_and_digital_inclusion_2009_pro.pdf?dtrk=true

⁹ ONS (2019) 'Exploring the UK's digital divide' Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheuksdigitaldivide/2019-03-04>

¹⁰ ONS (2019) 'Exploring the UK's digital divide' Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheuksdigitaldivide/2019-03-04>

¹¹ Approximated Social Grade with its six categories A, B, C1, C2, D and E is a socio-economic classification produced by the ONS by applying an algorithm developed by members of the MRS Census & Geodemographics Group. DE social grade covers semi-skilled & unskilled manual occupations, unemployed and lowest grade occupations.

¹² Age Concern (no date) 'Introducing another World: older people and digital inclusion' Available at: https://www.ageuk.org.uk/Documents/EN-GB/For-professionals/Computers-and-technology/140_0809_introducing_another_world_older_people_and_digital_inclusion_2009_pro.pdf?dtrk=true

¹³ Age UK (no date). 'Engaging with Older People evidence review'. Available at: https://www.ageuk.org.uk/documents/en-gb/for-professionals/evidence_review_engaging_with_older_people.pdf?dtrk=true

¹⁴ Iriss (2020): 'Digital inclusion, exclusion and participation'. Available at: <https://www.iriss.org.uk/resources/esss-outlines/digital-inclusion-exclusion-and-participation>

¹⁵ Ofcom (2018): 'Access and Inclusion 2018: Consumers' experiences in communications markets' Available at: https://www.ofcom.org.uk/_data/assets/pdf_file/0018/132912/Access-and-Inclusion-report-2018.pdf

The **design of digital devices**, services and content is greatly important for disabled people. Here, visual and hearing impairments may create barriers to usage, as well as physical dexterity that can cause difficulties while using a mouse and keyboard. When online, the complicated presentation of information, use of too many colours and the size and layout of text may also be challenging for some disabled people.¹⁶

2.1.3 Race: People from some BAME communities

In the 2011 census, people from Bangladeshi ethnic backgrounds were the group most likely to not speak English well or at all. Women from BAME backgrounds were also more likely to not be able to speak English well, for example 60% of those who could not speak English well were female (Pakistani and Bangladeshi women were five times more likely than their male counterparts to speak no English at all).¹⁷

Research suggests that English is the most commonly used language on the internet, followed by Chinese, Spanish and Arabic.¹⁸ Not having a high level of English proficiency may therefore act as a barrier as information is predominantly communicated and represented in English online.

2.1.4 Sex: Women

Although the number of internet non-users has been continuously declining, in 2018, 58% (3.1 million) of these were **women**. A disparity between men and women in digital skills also exists, with 61% of people who had zero basic digital skills in 2018 being women.¹⁹

2.1.5 Deprivation: Low-income groups

Research published by ONS has illustrated that among working age adults, a higher proportion of **economically inactive** (22.3%) people are internet non-users when compared to those with other economic activities.²⁰ The cost of devices and connectivity is an important factor preventing many people from accessing the internet. Customers without the means to buy data are finding themselves facing social isolation with no means of communicating with the outside world if they need to isolate themselves during a pandemic.

As the government increasingly moves its services to self-serve channels, significant numbers of people who are unable to move online, or who are not computer-literate, may miss out on government services. People who are digitally excluded are likely to be disproportionately heavy users of government services, as nearly half of those seeking help on tax and tax credit issues do not have access to a computer.²¹

¹⁶ Iriss (2020): 'Digital inclusion, exclusion and participation'. Available at: <https://www.iriss.org.uk/resources/esss-outlines/digital-inclusion-exclusion-and-participation>

¹⁷ Office for National Statistics (2018) 'English language skills'. Available at: <https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/demographics/english-language-skills/latest>

¹⁸ Young, H. (no date): 'The digital language divide: how does the language you speak shape your experience on the internet?'. Available at: <http://labs.theguardian.com/digital-language-divide/>

¹⁹ ONS (2019) 'Exploring the UK's digital divide' Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheuksdigitaldivide/2019-03-04>

²⁰ ONS (2019) 'Exploring the UK's digital divide' Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/articles/exploringtheuksdigitaldivide/2019-03-04>

²¹ Poverty and social exclusion (no date), 'Growing problem of digital exclusion'. Available at: <https://www.poverty.ac.uk/report-social-exclusion-disability-older-people/growing-problem-digital-exclusion/>

2.2 Social distancing

The Government COVID-19 CPO guidance highlights the potential for CPO documents to be made available in person, should social distancing restrictions be sufficiently eased. However, social distancing measures are likely to be required for a prolonged period, even once pandemic lockdown requirements have been substantially eased. Research suggests that the act of social distancing can create challenges for some protected characteristic groups.

2.2.1 Age: children

Families with children may experience challenges with social distancing measures due to the requirement to stay a set distance away from those from other households. Those with young children and larger families may find social distancing particularly challenging. Evidence shows that, due to cultural and economic differences, some **ethnic groups** tend to have larger families than others. On average, Pakistani, Bangladeshi and Black African households include more children when compared to other ethnicities.²²

2.2.2 Disabled people

The charity Fight for Sight conducted a survey to explore the impact that COVID-19 is having on those with **visual impairments**. Two in five respondents with significant sight loss reported that they experienced difficulties following social distancing guidelines.²³ The charity has also highlighted concerns around maintaining social distancing and individuals with a **guide dog**. Such individuals can experience challenges as guide dogs have not been trained to socially distance, and individuals often cannot see others well enough to move away. Those with visual impairments are also less likely to notice measures that have been implemented, such as one-way systems, and therefore rely on staff presence for assistance. As lockdown restrictions have eased, public spaces have become busier and social distancing has become increasingly difficult. As a result, those who have a guide dog have started to feel more vulnerable, at risk and uncomfortable in public spaces.²⁴

Social distancing can also be challenging for those with **reduced mobility**, particularly **wheelchair users**. In public spaces, the width of areas (such as pavements, waiting areas and supermarket aisles) are often not wide enough for two people to pass at the required two metre distance. This becomes increasingly challenging when one of the individuals is a wheelchair user. Cluttering, such as street furniture, and tables and chairs, also make spaces narrower and less accessible to those in a wheelchair. The queues that are generated outside premises as a result of social distancing can also be a challenge for those with reduced mobility. For sanitation and hygiene reasons, chairs are often not provided at intervals throughout the queue meaning people do not have a place to rest. Consequently, those with reduced mobility may end up standing for prolonged periods of time.²⁵ As the predominant form of disability in older age is a problem with levels of mobility,²⁶ the above barriers are likely to be disproportionately experienced by **older people**.

For **autistic** people and those with a **learning disability**, the pandemic is more likely to cause confusion, fear and additional challenges. There may be the need for detailed planning before a journey or activity is carried out as people who belong to these groups are often used to specific routines and can be unsettled by

²² Resolution Foundation (2017): 'Diverse outcomes: Living standards by ethnicity'. Available at: <https://www.resolutionfoundation.org/app/uploads/2017/08/Diverse-outcomes.pdf>

²³ Fight for Sight (2020): 'Survey shows serious impact of lockdown on people with sight loss'. Available at: <https://www.fightforsight.org.uk/news-and-articles/articles/news/cancelled-eye-surgeries-during-lockdown-putting-partially-sighted-people-at-risk-of-permanent-sight-loss/>

²⁴ Fight for Sight (2020): 'London guide dog user highlights issues social distancing is causing people with sight loss'. Available at: <https://www.fightforsight.org.uk/news-and-articles/articles/supporter-stories/london-guide-dog-user-highlights-issues-social-distancing-is-causing-people-with-sight-loss/>

²⁵ Disability Action Yorkshire (2020): '6 top tips for accessible social distancing'. Available at: <https://www.disabilityactionyorkshire.org.uk/news/articles/6-top-tips-for-accessible-social-distancing/>

²⁶ Age UK (2016): 'Diversity in older age – Disability'. Available at: https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/equality-and-human-rights/rb_may16_cpa_rapid_review_diversity_in_older_age_disability.pdf

change. Individuals may have difficulty understanding rules around social distancing and infection control measures, further heightening anxieties and confusion. Explaining the guidelines in simple terms can be helpful, but the constant revising of social distancing measures creates a further challenge for this group.²⁷

For people with **anxiety** and **depression** or diagnosed with dementia, social distancing could have a severe impact in exacerbating such conditions. There is also a real danger that social distancing may turn into 'social isolation' for those without a strong network of family and friends and a way to connect to others outside the home, such as digital technology.²⁸

Social distancing has resulted in many locations allowing just one person per household or group to enter at once. However, some disabled people require a **companion with them for assistance**. Disability charities have urged organisations to be considerate of the needs of disabled users, and to act with discretion when allowing them to enter and exit buildings and public spaces.²⁹

2.3 Leaving the home

Throughout the pandemic, the Government has advised clinically vulnerable individuals to shield.³⁰ Although shielding guidance is gradually being relaxed, with individuals now able to leave their home with precaution, many will still feel at risk. As a result, even if social distancing measures are sufficiently eased and CPO documents are made available for inspection in person, some groups may still feel uncomfortable leaving the home to do so.

2.3.1 Age: older people

In the UK, almost nine million people over the age of 70 were advised by the Government to 'strictly adhere' to social distancing rules, only leaving their home for essential purposes. Despite major efforts across the public and voluntary sectors and local communities, many **older people** have struggled to get the support they need throughout the pandemic. Age UK have reported an increase in calls from older people who are very worried about the virus, with some too fearful to leave the house for essential supplies. Some older people have highlighted that they are confused by Government guidance, and that their usual support networks are unable to operate because of the virus, meaning they are unable to leave the house.³¹ This may impact the likelihood of older people leaving their home to visit copies of CPO order and map in a public space, should this option be made available at some point.

2.3.2 Disabled people

Results of the Opinions and Lifestyle Survey carried out by ONS showed the social impact of COVID-19 on disabled people in Great Britain. In May 2020, around one in ten disabled people felt very unsafe outside of their home because of the pandemic, compared to around one in 25 for non-disabled people.³² Disabled people are therefore more likely to feel **vulnerable outside of their home**. As with older people, this may

²⁷ Social Care Institute for Excellence (2020): 'COVID-19 guide for care staff supporting adults with disabilities or autistic adults'. Available at: <https://www.scie.org.uk/care-providers/coronavirus-covid-19/learning-disabilities-autism/care-staff>

²⁸ Centre for Ageing Better (April 2020) 'COVID-19: How social distancing will deepen inequalities among older people' Available at: <https://www.ageing-better.org.uk/blogs/covid-19-how-social-distancing-will-deepen-inequalities-among-older-people>

²⁹ Disability Action Yorkshire (2020): '6 top tips for accessible social distancing'. Available at: <https://www.disabilityactionyorkshire.org.uk/news/articles/6-top-tips-for-accessible-social-distancing/>

³⁰ Public Health England (2020): 'Guidance on shielding and protecting people who are clinically extremely vulnerable from COVID-19'. Available at: <https://www.gov.uk/government/publications/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19/guidance-on-shielding-and-protecting-extremely-vulnerable-persons-from-covid-19>

³¹ Age UK (2020): 'Sounding the alarm about the rising risk of malnutrition among older people during lockdown'. Available at: <https://www.ageuk.org.uk/latest-press/articles/2020/05/sounding-the-alarm-about-the-rising-risk-of-malnutrition-among-older-people-during-lock-down/>

³² ONS (2020): 'Coronavirus and the social impacts on disabled people in Great Britain: May 2020'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/coronavirusandthesocialimpactsondisabledpeopleingreatbritain/may2020>

impact the likelihood of disabled people leaving their home to visit copies of CPO documentations, should these become available.

2.4 Staff assistance

As per the Government COVID-19 CPO guidance, publication of the order and map online by the acquiring authority sufficiently fulfils the criteria under the Acquisition of Land Act 1981.³³ However, should information solely be made available in an online format, the presence of staff and face-to-face interaction is unlikely to be apparent. Some protected characteristic groups are more likely to disbenefit from the lack of interaction with TSDL scheme staff.

2.4.1 Age: Older people

Older people, in general, value the **interpersonal aspects of communication**, which can often be overlooked in a digitalised world. Oral communication has the added benefit of making the person in question feel valued. The more informal, conversational aspects of information delivery can be preferred by older people, whilst helping them to achieve a sense of community involvement.³⁴ Although the internet can be a useful tool during public consultation and engagement, it is most beneficial when used as a supplement to face-to-face interaction, not a substitute.³⁵ The presence of staff to discuss CPO documents is therefore likely to be particularly important to older people.

2.4.2 Disabled people

By law, disabled people have the right to be treated equally and to have **information made accessible** to them, as stated in The Equality Act, 2010. This means that disabled service users must receive information in formats that they are able to understand, and that appropriate support is provided to help them to communicate. Failure to do so may constitute disability discrimination. There is a duty on service providers to make reasonable adjustments to improve accessibility of services for disabled people, such as providing extra staff assistance.³⁶ Many disabled people prefer face to face and one to one communication, with the ability to ask open questions without distraction or the presence of a large group.³⁷

Data published by ONS has demonstrated that in 2018, disabled people were more likely to have been involved in civic participation than non-disabled people (46% compared to 38%, respectively).³⁸ Service providers should therefore consider these preferences when there is the need to display information to the public to ensure high levels of participation continue.

2.5 Response timeframes

Under the Government COVID-19 CPO guidance, there is potential for acquiring authorities to increase time periods for people to respond when requesting information and when submitting objections to CPO. An increase in CPO response timeframes may benefit disabled people.

³³ Ministry of Housing, Communities & Local Government (2020): 'Coronavirus (COVID-19): compulsory purchase guidance'. Available at: <https://www.gov.uk/guidance/coronavirus-covid-19-compulsory-purchase-guidance>

³⁴ Age-UK, 'Age Friendly London'. Available at: <https://www.ageuk.org.uk/london/projects-campaigns/age-friendly-london/communication-information/>

³⁵ Age UK (no date). 'Engaging with Older People evidence review'. Available at: https://www.ageuk.org.uk/documents/en-gb/for-professionals/evidence_review_engaging_with_older_people.pdf?dtrk=true

³⁶ Citizen Advice (no date): <https://www.citizensadvice.org.uk/law-and-courts/discrimination/what-are-the-different-types-of-discrimination/duty-to-make-reasonable-adjustments-for-disabled-people/>

³⁷ Mencap (no date): 'Making communication work'. Available at: <https://www.mencap.org.uk/learning-disability-explained/communicating-people-learning-disability>

³⁸ ONS (2019): 'Disability and social participation, England: 2018'. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandsocialparticipationengland/2018>

2.5.1 Disabled people

Autistic people and people with a **learning disability** might require extra time to interpret complex information, no matter how accessible it is.³⁹ Evidence from the NHS suggests that people with a learning disability may have a 'significantly reduced ability to understand new or complex information' and are often unable to cope independently.⁴⁰ Such individuals will still need support to access easy read documents, while others may need information in a completely different format.⁴¹ As a result, a longer response timeframe may be beneficial to this group to help interpret CPO documents, and ask the Council any questions that may arise.

3 Action plan and recommendations

The following seeks to act as a continuation of the action plan presented in the previous TSDL EqIA. The action plan establishes activities and responsibilities to continue ensure equality issues are appropriately mitigated should they arise.

Table 3.1 Action plan

Action	Responsibility	Implementation and timing
<p>Ensure that the CPO documentation is presented to the public in plain English both online and in person (should presenting the information in a public space become a viable option).</p> <p>Information should be clear, concise and accessible to all, with the option for people to request information in other formats (such as different languages, audio and easy read versions) should this be necessary.</p>	Chichester District Council	All information should be shared in an accessible and transparent manner throughout the entirety of the CPO process. A responsible party should be assigned to the task, ensuring any member of the public who enquires about the format of CPO documentation is responded to in a timely manner.
<p>Consider the use of digital information provision, such as imagery and videos to make CPO documents available online more engaging. These techniques can quickly and simply demonstrate what a scheme will look like upon completion, and be easier to interpret than 2D technical maps and drawings. This action may help to compensate for the lack of staff presence, with staff often helping members of the public interpret scheme drawings and designs.</p>	Countryside Properties Chichester District Council	Prior to CPO documents being made available online, a meeting should be held between Countryside Properties and the Council to discuss the potential benefits of illustrative drawings and imagery to help present material.
<p>Details of staff members that are part of the TSDL project team should be provided alongside the CPO documents made available online. Details should also be provided with documents sent out in the post, should this be requested by a member of public. Telephone numbers and email</p>	Chichester District Council	Prior to CPO documents being made available online, a meeting should be held to discuss which members of the TSDL project team at the Council should be contactable by members of the public with any questions or concerns that may arise.

³⁹ Change People (no date): 'How to make info accessible guide'. Available at: <https://www.changepeople.org/getmedia/923a6399-c13f-418c-bb29-051413f7e3a3/How-to-make-info-accessible-guide-2016-Fin>

⁴⁰ NHS (2015): 'Supporting people with a learning disability and/or autism who display behaviour that challenges, including those with mental health conditions'. Available at: <https://www.england.nhs.uk/wp-content/uploads/2015/10/service-model-291015.pdf>

⁴¹ Change People (no date): 'How to make info accessible guide'. Available at: <https://www.changepeople.org/getmedia/923a6399-c13f-418c-bb29-051413f7e3a3/How-to-make-info-accessible-guide-2016-Fin>

Action	Responsibility	Implementation and timing
addresses should be provided so that individuals are able to contact staff remotely should they have questions about the scheme or require assistance with interpreting any aspect of the CPO documents. Virtual meetings and conference calls may also be set up using the contact details provided.	Countryside Properties Chichester District Council	Prior to CPO documents being made available online, the Council and Countryside Properties should hold a meeting to discuss appropriate timescales for CPO responses and objections. The impact of COVID-19 on delays to the postal system and peoples' ability to leave the home should be discussed. Consideration should be given to extending the response period by 50% of the original period that fell within lockdown. For example, if one month of the original response period has been impacted by COVID-19, the response timeframe would be extended by two weeks. ⁴²
Should Government guidelines change meaning copies of the CPO order and map can be displayed in a public space, the necessary social distancing and hygiene measures should be adhered to at all times. This will ensure individuals feel safe when visiting the documents in person, increasing the likelihood of vulnerable groups visiting.	Chichester District Council	The Council should monitor social distancing restrictions throughout the entirety of the CPO process. Should social distancing restrictions be eased sufficiently enough for the inspection of documents to take place in person, this should be adhered to in a timely manner.
Should Government guidelines change meaning copies of the CPO order and map can be easily displayed in a public space, the Council should ensure vulnerable groups (particularly older people and disabled people) are considered. Rest points should be provided if a queue and / or one-way system is implemented, and priority entry should be provided to these groups where queues accumulate.	Chichester District Council	The Council should hold a meeting to discuss the accessibility of the space in which CPO documents are to be inspected, ensuring these are implemented by all members of staff present.

⁴² Suggested timeframes have been based on professional judgement. The Government COVID-19 CPO guidance does not provide details on the extent to which CPO response periods should be extended.