<u>Charnwood Local Plan 2021-2037</u> <u>Equality Impact Assessment of Policies</u>

(June 2021)



Introduction and Methodology

An Equality Impact Assessment has been undertaken to assess the potential discriminatory impacts of draft policies contained within Charnwood Local Plan 2021-2037 and recommends how issues can be mitigated.

The Equalities Act 2010 defines nine protected characteristics and discrimination is recognised when treatment of a person or group is impacted by these:

- **1.** Age
- 2. Disability
- 3. Gender reassignment
- **4.** Marriage and civil partnership
- **5.** Pregnancy and maternity
- 6. Race
- 7. Religion or belief
- 8. Sex (Gender)
- 9. Sexual orientation

The public sector equality duty requires public authorities to have due regard to the following objectives when carrying out their functions:

- **A.** eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- **B.** advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- **C.** foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Council has been mindful of behaviour and decisions that are prohibited under the Equalities Act 2010, including:

- 1. Direct Discrimination
- 2. Indirect Discrimination
- **3.** Harassment
- 4. Victimisation
- **5.** Discrimination by association
- **6.** Discrimination by perception
- 7. Pregnancy and maternity discrimination
- 8. Discrimination arising from disability
- **9.** Failing to make reasonable adjustments

Equalities considerations have informed the Council's overall approach throughout the plan-making process. This document has been informed by Council Officers who have been directly involved with the policy drafting. The Equalities Impact Assessment for each policy is in the following table and makes an assessment will full consideration of the above sets of criteria. All equalities matters have been addressed as set out in the table.

This document demonstrates considerations made, and comments are welcomed through the Regulation 19 'Publication' consultation on the Local Plan.

Policy	Policy Content Summary	Equalities Impact and Recommendation
DS1 Development Strategy	Sets out an overall development strategy of urban concentration under a hierarchy of settlements by size.	The policy establishes high-level strategic principles and would therefore have equal impacts across society. Individual policies in the plan elaborate on the delivery of strategic matters and each are assessed in this table.
	Sets out the borough's requirement for housing, employment and town centre uses. Sets out environmental considerations in relation to flooding and other protective	Neutral impact – no further action.
DS2 Leicester and Leicestershire Unmet Needs	designations. Sets out a commitment to review the Local Plan	This is a Local Plan operational policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic. Neutral impact – no further action.
DS3 Housing Allocations	Sets out housing allocations.	It is possible that individual sites may have site specific impacts on those with protected characteristics, depending on factors such as the existing use of the site or nearby occupiers. It is considered that site specific equalities matters will be raised and addressed most appropriately through the development management process. Recognition of this should be reflected in the plan. Potential Impact – plan should specify that planning decisions are to be mindful of the public sector equalities duty.
		Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. No further action required.

Policy	Policy Content Summary	Equalities Impact and Recommendation
DS4 Employment Allocations	Sets out employment allocations.	It is possible that individual sites may have site specific impacts on those with protected characteristics, depending on factors such as the existing use of the site or nearby occupiers. It is considered that site specific equalities matters will be raised and addressed most appropriately through the development management process. Recognition of this should be reflected in the plan. Potential Impact – plan should specify that planning decisions are to be mindful of the public sector equalities duty. Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. No further action required.
DS5 High Quality Design	Sets out design criteria to ensure development is attractive and functional, including protecting nearby amenity, considering the overall quality of the area in the long-term, and encouraging spaces that promote active lifestyles and social interaction.	Well designed development has a positive impact across society for a multitude of reasons. Well designed environments in terms of promoting functionality, social interaction and active lifestyles could particularly have a positive impact on people who are socially excluded or who want to become more active for mental or physical health reasons (age, disability). Positive impact – no further action. (Note Policy DS5 has been amended to reflect the principles of the public sector equalities duty to address actions required for other policies)
LUA1 Leicester Urban Area	Sets out criteria to support development in the Leicester Urban Area including regeneration priorities.	The policy establishes strategic place-based principles echoing several policies that are assessed separately in this table. The benefits of achieving stated regeneration priorities are wide-ranging for all of society and are therefore unlikely to disproportionately impact people with a protected characteristic. Initiatives supported by this policy may have unintended site-specific impacts on any protected characteristic. It is considered that site specific equalities matters will be raised and addressed most appropriately through the development management process. Recognition of this should be reflected in the plan. Potential Impact – plan should specify that planning decisions are to be mindful of the public sector equalities duty.

Policy	Policy Content Summary	Equalities Impact and Recommendation
		Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. No further action required.
LUA2 North East of Leicester Sustainable Urban Extension	Sets out the requirement for housing (including gypsy, traveller and travelling showpeople), employment, community facilities, transport, environment to support the	This policy establishes site specific considerations for the delivery of the Sustainable Urban Extension echoing several policies that are assessed separately in this table. The benefits of achieving these considerations will be that it will result in a sustainable site for the benefit of all society and is therefore unlikely to disproportionately impact people with a protected characteristic.
	delivery of the Sustainable Urban Extension.	Neutral impact – the impact of individual policy areas are assessed separately in this table. No further action.
LUA3 North of Birstall Sustainable Urban Extension	Sets out the requirement for housing (including travelling showpeople), employment, community facilities, transport, environment to support the delivery of the Sustainable Urban Extension.	This policy establishes site specific considerations for the delivery of the Sustainable Urban Extension echoing several policies that are assessed separately in this table. The benefits of achieving these considerations will be that it will result in a sustainable site for the benefit of all society and is therefore unlikely to disproportionately impact people with a protected characteristic. Neutral impact – the impact of individual policy areas are assessed separately in this table. No further action.
LUC1 Loughborough Urban Centre	Sets out criteria to support development in Loughborough including regeneration priorities.	The policy establishes strategic place-based principles echoing several policies that are assessed separately in this table. The benefits of achieving stated regeneration priorities are wide-ranging for all of society and are therefore unlikely to disproportionately impact people with a protected characteristic. Initiatives supported by this policy may have unintended site-specific impacts on any protected characteristic. It is considered that site specific equalities matters will be raised and addressed most appropriately through the development management process. Recognition of this should be reflected in the plan. Potential Impact – plan should specify that planning decisions are to be mindful
		of the public sector equalities duty.

Policy	Policy Content Summary	Equalities Impact and Recommendation
		Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. No further action required.
LUC2 West of Loughborough Park Sustainable Urban Extension	Sets out the requirement for housing (including gypsy, traveller and travelling showpeople), employment, community facilities, transport, environment to support the delivery of the Sustainable Urban Extension.	This policy establishes site specific considerations for the delivery of the Sustainable Urban Extension echoing several policies that are assessed separately in this table. The benefits of achieving these considerations will be that it will result in a sustainable site for the benefit of all society and is therefore unlikely to disproportionately impact people with a protected characteristic. Neutral impact – the impact of individual policy areas are assessed separately in this table. No further action.
LUC3 Loughborough Science & Enterprise Park	Sets out the requirement for employment and criteria for the delivery of the Loughborough University Science & Enterprise Park	The policy establishes site specific considerations for the delivery economic growth of the science and enterprise park echoing several policies that are assessed separately in this table. Equal access to employment opportunities created is protected under employment law and therefore falls outside of the planning process. Neutral impact – the impact of individual policy areas are assessed separately in this table. No further action.
SUA1 Shepshed Policy	Sets out criteria to support development in Shepshed including regeneration priorities.	The policy establishes strategic place-based principles echoing several policies that are assessed separately in this table. The benefits of achieving stated regeneration priorities are wide-ranging for all of society and are therefore unlikely to disproportionately impact people with a protected characteristic. Initiatives supported by this policy may have unintended site-specific impacts on any protected characteristic. It is considered that site specific equalities matters will be raised and addressed most appropriately through the development management process. Recognition of this should be reflected in the plan.
		Potential Impact – plan should specify that planning decisions are to be mindful of the public sector equalities duty.
		Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. No further action required.

Policy	Policy Content Summary	Equalities Impact and Recommendation
SC1 Service Centres	Sets out criteria to support development in Service Centres including regeneration priorities.	The policy establishes strategic place-based principles echoing several policies that are assessed separately in this table. The benefits of achieving stated regeneration priorities are wide-ranging for all of society and are therefore unlikely to disproportionately impact people with a protected characteristic. Initiatives supported by this policy may have unintended site-specific impacts on any protected characteristic. It is considered that site specific equalities matters will be raised and addressed most appropriately through the development management process. Recognition of this should be reflected in the plan. Potential Impact – plan should specify that planning decisions are to be mindful of the public sector equalities duty. Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. No further action required.
OS1 Other Settlements	Sets out criteria to support development in Other Settlements including regeneration priorities.	The policy establishes strategic place-based principles echoing several policies that are assessed separately in this table. The benefits of achieving stated regeneration priorities are wide-ranging for all of society and are therefore unlikely to disproportionately impact people with a protected characteristic. Initiatives supported by this policy may have unintended site-specific impacts on any protected characteristic. It is considered that site specific equalities matters will be raised and addressed most appropriately through the development management process. Recognition of this should be reflected in the plan. Potential Impact – plan should specify that planning decisions are to be mindful of the public sector equalities duty. Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. No further action required.

Policy	Policy Content Summary	Equalities Impact and Recommendation
C1 Countryside	Sets out criteria to restrict the development of isolated homes in the countryside.	It is possible that people may seek to build a home at an isolated location to respond to their circumstance, for example locational requirements to assist with limited mobility (disability) or lifestyle requirements (religion and belief).
		Potential Impact – plan should specify that planning decisions are to be mindful of the public sector equalities duty. Policy could specify that locational requirements can also be justified by equalities reasons.
		Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. Supporting text to policy amended to state that exceptions to the policy will be considered under the public sector equalities duty. No further action required.
H1 Housing Mix	Sets out a requirement for a mix of house types, tenures and sizes.	An increased range of housing mix availability in the borough will ensure that the housing market meets a range of characteristic specific requirements. This would enable people with mobility problems to downsize (age, disability) and enable growing households to upsize (age, pregnancy and maternity). A range of tenures would enable people to access the housing market depending on their economic circumstance which may be related to any protected characteristic.
		Positive impact – no further action.
H2 Housing for Older People and People with	Sets out requirements for a proportion of new dwellings to meet optional Building Regulations standards that	An increased range of specialist and specifically adapted homes would ensure that the housing market meets the needs of those with mobility problems or other specialist health needs (age, disability).
Disabilities	provide for wheelchair users and lifetime homes, and support for the provision of bungalows and specialist accommodation.	Positive impact – no further action.
H3 Internal Space Standards	Sets out the requirement that new dwellings have regard to the Nationally Described Space Standards	Minimum space standards will provide a baseline standard for all new dwellings, which will ensure that the typical space requirements of occupiers across society of new homes are met. This would ensure that the market is providing basic space standards for younger first-time buyers (age).

Policy	Policy Content Summary	Equalities Impact and Recommendation
		Positive impact – no further action.
H4 Affordable Housing	Sets out a requirement for affordable housing to be delivered based on the borough's identified need.	Provision of affordable housing to meet the borough's demand would enable people to access the housing market depending on their economic circumstance which may be related to any protected characteristic. Positive impact – no further action.
H5 Rural Exception Sites	Sets out criteria for small scale rural housing sites.	The policy establishes strategic principles in relation to the delivery of certain affordable housing sites and likely to have equal impacts across society and, therefore, is unlikely to disproportionately impact people with a protected characteristic. Where rural exception sites deliver affordable housing, the equalities impact of this is set out in the assessment for Policy H4. Positive impact – no further action.
H6 Self-build and Custom Housebuilding	Sets out general support for proposals for self build and custom housebuilding.	The policy would make it easier for individuals to build their own home, which could possibly include features for a specific equalities reason such as specific rooms, design requirements, etc. These could be related to most protected characteristics. Potential Impact – plan should specify that planning decisions are to be mindful of the public sector equalities duty. Action taken - amend Policy DS5, which relates to all proposals, to reflect principles of the public sector equalities duty. No further action required.
H7 Houses in Multiple Occupation	Sets out restrictive measures to reduce the proportion of houses in multiple occupation within any area.	Houses in Multiple Occupation form a significant proportion of student housing stock in the borough. There has been a general continuous growth in the student population for many years. Students are generally younger and this policy, if too restrictive, could potentially result in an under supply for the student market which would be a discriminatory impact of the policy (age). However, the Council considers that the aim of this policy is to disperse Houses in Multiple Occupation which would result in more

Policy	Policy Content Summary	Equalities Impact and Recommendation
		balanced communities which would have wider sustainability benefit for the occupiers. In addition policy LP10 seeks to support purpose built student accommodation.
		Neutral Impact – no further action
H8 Campus and Purpose Built Student	Sets out support for the development of purpose-built student accommodation.	The student population of the borough has had general continuous growth for many years. This policy would ensure that the market is providing purpose built student accommodation for students who are a generally younger demographic (age).
Accommodation		Positive impact – no further action.
H9 Gypsies, Travellers and Travelling Show people	Sets out support and design and sustainability criteria for gypsy, traveller and travelling show people sites. (Policy to be read alongside specific allocations made in the Sustainable Urban Extension policies)	Establishing a positive policy for the provision of gypsy, traveller and travelling show people sites will ensure that the market delivers for safe, healthy, attractive and sustainable sited for these communities (race, religion and belief). In addition, the Sustainable Urban Extension policies make specific allocations to meet the identified requirement for gypsy, traveller and travelling show people communities. The methodology for the study used research methods that widened stakeholder engagement in order to take appropriate account of these hard to reach communities. Positive impact – no further action.
		Positive impact – no further action.
E1 Meeting Employment Needs	Sets out criteria to support a range of employment sectors.	The policy establishes strategic principles in relation to delivering economic growth and would therefore have equal impacts across society. Equal access to employment opportunities created is protected under employment law and therefore falls outside of the planning process.
		Neutral impact – no further action.
E2 Protecting Existing Employment Sites	Sets out protective criteria to retain existing employment sites.	The policy establishes strategic principles in relation to protecting employment sites and would therefore have equal impacts across society. Equal access to employment opportunities created is protected under employment law and therefore falls outside of the planning process.
		Neutral impact – no further action.

Policy	Policy Content Summary	Equalities Impact and Recommendation
E3 Rural Economic Development	Sets out support for rural economic sectors including rural diversification, tourism, equestrian related business, and rural broadband provision.	The policy establishes strategic principles in relation to delivering economic growth in rural communities and would therefore have equal impacts across society. Equal access to employment opportunities created is protected under employment law and therefore falls outside of the planning process. Neutral impact – no further action.
T1 Town Centres and Retail	Sets out a hierarchy of designated retail/ main town centre use centres and criteria to protect their viability including widening the range of uses, ensuring centres are well designed and restricting clusters of hot food takeaways.	Supporting the viability of designated centres will protect the role of these as social and economic focal points for communities. General support for the widening of uses within centres would make it easier for businesses catering for specific equalities purposes to establish which may be related to any protected characteristic. Positive impact – no further action.
T2 Protection of Community Facilities	Sets out criteria for the protection of community facilities which are defined in the policy.	The availability of community facilities support the quality of life everybody therefore the policy is unlikely to disproportionately impact people with a protected characteristic. Community facilities provide different functions for different people (such as community centre support groups or access to sport, culture, religion and health facilities) which may provide for any protected characteristic. Positive impact – no further action.
T3 Car Parking Standards	Sets out requirements for car parking provision for residential and non-residential developments.	Adequate car parking in all settings is vital to ensure that those who need to use private vehicles can access facilities. People with mobility issues and childcare responsibilities can benefit from specialist parking infrastructure (disability, pregnancy and maternity). The policy could be improved by making specific reference to such facilities. Neutral/ Positive impact – Policy could give specific support to parking infrastructure that meets specialist space requirements for people with mobility issues or children. This includes ensuring that residential parking spaces meet minimum dimensions and ensuring that non-residential provision provides adequate specialist spaces. If this if covered within the latest published guidance,

Policy	Policy Content Summary	Equalities Impact and Recommendation
		it could still be beneficial to highlight this in the plan. Action taken - amend policy T3 or relevant design appendix to highlight specialist
		parking space requirements. No further action required.
CC1 Flood Risk Management	Sets out criteria to manage flood risk	This is a protective environmental policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.
		Neutral impact – no further action.
CC2 Sustainable Drainage	Sets out criteria for Sustainable Urban Drainage Systems.	This is a protective environmental policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.
Systems (SuDS)		Neutral impact – no further action.
CC3 Renewable and Low Carbon	Sets out criteria for renewable and low carbon energy installations.	This is a carbon agenda policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.
Energy Installations		Neutral impact – no further action.
CC4 Sustainable Construction	Sets out criteria to achieve carbon neutral construction methods.	This is a policy which seeks to achieve lower carbon emissions arising from new construction and is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.
		Neutral impact – no further action.
CC5 Sustainable Transport	Sets out criteria to promote a modal shift in the use of sustainable transport modes.	Enhanced sustainable transport provision will improve the range of access to different modes of transport which will have a positive impact for all of society. The policy could be improved by giving support to sustainable transport improvements that also advance opportunities for those with mobility issues (disabilities).
		Neutral/ Positive impact – Policy could give specific support to provision

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		accessibility also taking account of those with mobility issues.
		Action taken – Policy CC5 amended to consider those with mobility issues. No further action required.
CC6 Electric Vehicle Charging Points	Sets out requirements for electronic vehicle charging infrastructure for residential and non-residential developments.	This is a policy supporting the agenda to reduce carbon emissions and is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic. Neutral impact – no further action.
EV1 Landscape	Sets out criteria to protect valued landscape features.	This is a protective environmental policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.
		Neutral impact – no further action.
EV2 Green Wedges	Sets out criteria to retain and enhance designated green wedges	This is a protective environmental policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.
		Neutral impact – no further action.
EV3 Areas of Local Separation	Sets out criteria to protect designated Areas of Local Separation	This is a protective environmental policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.
		Neutral impact – no further action.
EV4 Charnwood Forest and the National Forest	Sets out criteria to protect and enhance the forests by supporting small scale economic opportunities and enhancing biodiversity and public access.	This policy will support the improvement of and access to the forests which will have a positive impact for all of society. The policy could be improved by giving support to network improvements that also advance opportunities for those with mobility issues to access the forest (disabilities).

Policy	Policy Content Summary	Equalities Impact and Recommendation
		Neutral/ Positive impact – Policy could give specific support to mobility access enhancements, i.e. path improvements and disability parking, which can be a barrier to access.
		Action taken – Policy CC5 amended to consider those with mobility issues. No further action required.
EV5 River Soar and Grand Union Canal Corridor	Sets out criteria to enhance the River Soar and Grand Union Canal Corridor by enhancing pubic access, tourism and biodiversity.	This policy will support the improvement of and access to the River Soar and Grand Union Canal Corridor which will have a positive impact for all of society. The policy could be improved by giving support to network improvements that also advance opportunities for those with mobility issues to access the forest (disabilities). Neutral/ Positive impact – Policy could give specific support to mobility access enhancements, i.e. path improvements and disability parking, which can be a barrier to access.
		Action taken – Policy EV5 amended to consider those with mobility issues. No further action required.
EV6 Conserving and Enhancing Biodiversity and Geodiversity	Sets out criteria to protect and enhance ecological and geological assets.	This is a protective environmental policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic. Neutral impact – no further action.
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EV7 Tree Planting	Sets out support and thresholds for the planting of trees.	This is an environmental policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.
		Neutral impact – no further action.
EV8 Heritage	Sets out criteria to conserve and enhance heritage assets.	This is a protective environmental policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic. The policy will give protection to buildings of significant historic or cultural

Policy	Policy Content Summary	Equalities Impact and Recommendation
		significance which could potentially have a positive impact on those with certain religion of beliefs.
		Neutral impact – no further action.
EV9 Open Space, Sport and Recreation	Sets out criteria to protect open space assets and for the provision of new open space to support development.	Open space provision has a positive impact across society for a multitude of reasons, including promoting social interaction and active lifestyles. This could particularly have a positive impact on people who are socially excluded or who want to become more active for mental or physical health reasons (age, disability). The policy specifies different categories of open space, including provision for children's play equipment, burial sites and allotments, all of which will disproportionately provide for different demographics (age). Positive impact – no further action.
EV10 Indoor Sports Facilities	Sets out criteria for the provision of indoor sports facilities.	Sport facility provision has a positive impact across society for a multitude of reasons, including promoting social interaction and active lifestyles. This could particularly have a positive impact on people who are socially excluded or who want to become more active for mental or physical health reasons (age, disability).
		Positive impact – no further action.
EV11 Air Quality	Sets out criteria to improve air quality through the reduction of air pollutants.	The improvement of air quality will reduce the number of new chronic lung conditions and have a positive impact on the ability for those suffering from such conditions to manage their health (disabilities). Air pollution can also have adverse side effects on unborn babies therefore reductions in pollutants would have benefit (pregnancy and maternity).
		Positive impact – no further action.
EV12 Burial space	Sets out an allocation for burial space.	The policy allocates burial space provision in the borough which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic.

Policy	Policy Content Summary	Equalities Impact and Recommendation
		Neutral impact – no further action.
INF1 Infrastructure and Developer Contributions	Sets out how developer contributions for new or improved infrastructure to support development will be sought.	This is an infrastructure provision related policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic. Neutral impact – no further action.
INF2 Local and Strategic Road Network	Sets out criteria to manage the impact of proposals on the road network.	This is an infrastructure provision related policy which is likely to have equal impacts across society and is therefore unlikely to disproportionately impact people with a protected characteristic. Neutral impact – no further action.

Action Plan

Identified concerns/actions/issues in this action plan:							
Reference Number	Action	Responsible Officer	Target Date				
1	Actions arising from individual policies have been identified in the recommendation section of the assessment table. These have been considered and resolved as set out in the table.	Seb Wilkins (Senior Planning Officer)	Completed				

Service Head Review

Please delete as appropriate	
I agree / disagree with this assessment / action plan	
If disagree, state action/s required, reasons and details of who is to carry them out with timescales:	
Signed (Service Head):	
Date: June 2021	