

Draft Greater Norwich Local Plan

Equality Impact Assessment

Assessing the impact of the Local Plan policies upon different sections of the community.

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Introduction

The Equality Act 2010 requires local authorities to ensure that their plans and policies do not adversely impact upon any group with 'protected characteristics', and furthermore should encourage greater equality between different groups. The following characteristics are protected characteristics under the Public Sector Equality Duty (PSED):

- age;
- disability;
- gender reassignment;
- marriage and civil partnership (section 149 (1) (a) only);
- pregnancy and maternity;
- race;
- religion or belief;
- gender; and
- sexual orientation.

The Draft Greater Norwich Local Plan provides strategic policies to guide development over Greater Norwich until 2038. It also identifies sites for housing or employment development, and incorporates site specific policies in the site allocations. Applying the Public Sector Equality Duty to local plans, it is important to assess whether policies in the Draft Greater Norwich Local Plan (GNLP) have any impact (positive or negative) on any protected group.

Methodology

First, the population of Greater Norwich have been considered as the context for the study. The majority of this data comes from the latest Census.

A scoping exercise has determined that land use policies in any local plan are unlikely to have any potential impact on people in relation to life choices regarding personal identity and relationships, nor on people according to their inherent sexual preferences. The following protected characteristics have therefore been scoped out of this report: gender reassignment; sexual orientation; and marriage/civil partnership.

A screening exercise has then considered the potential of the policies in the draft plan to have a positive or negative impact on people with the following protected characteristics:

- age;
- gender;
- race;
- religion or belief;
- disability;
- pregnancy;

For the purposes of the screening process, the protected groups of race and religion/belief; and pregnancy and health have been considered together.

The tables in the report identify any protected groups which may be impacted (either positively or negatively) by each policy in turn. If a policy would have no impact on a particular group, the result is recorded as 'not applicable'.

Where the screening exercise identifies that any GNLP policy has an impact upon one or more group, this is explained. If any negative impact exists, the policy has been subject to further consideration. The requirement for a full Equality Impact Assessment is considered with the aim of avoiding negative impact upon the identified group or groups, and to take steps to meet the needs of people from protected groups where these are different from the needs of other people.

Following any policy amendment, if a GNLP policy is found to have either a positive or a negative impact on a protected group, the report proposes a method of monitoring the impact.

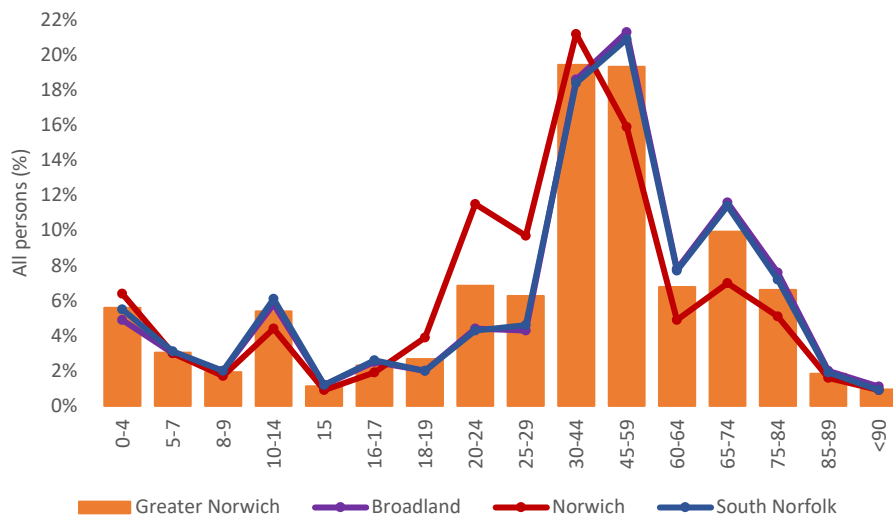
Greater Norwich Context

The information in this section provides a context for the consideration of GNLP policies. It gives an overview of social diversity in Greater Norwich and identifies as many of the different protected groups as possible.

Age

The graphs below show the number of people in various age groups as a percentage of the total population. Graph 1 shows that the authorities' populations are very similar, except a spike in university-aged young people in Norwich and a higher percentage of people of retirement age in Broadland and South Norfolk.

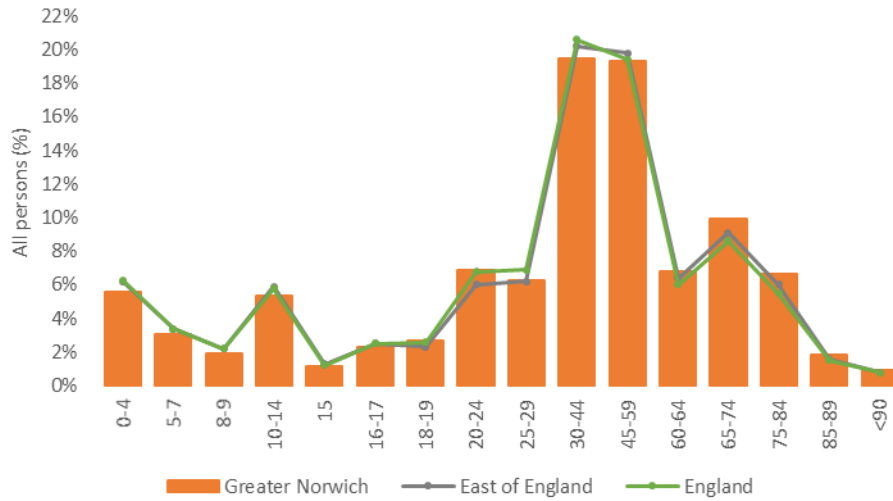
Graph 1: Age Group Comparison (Greater Norwich, Broadland, Norwich, South Norfolk)
 Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]



Graph 2 shows that the Greater Norwich populations are very similar to regional and national percentages, although we do have a slightly higher percentage of elderly residents in Greater Norwich. This has implications for health and social care, and potentially access to services.

Graph 2: Age Group Comparison (Greater Norwich, East of England, England)

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]

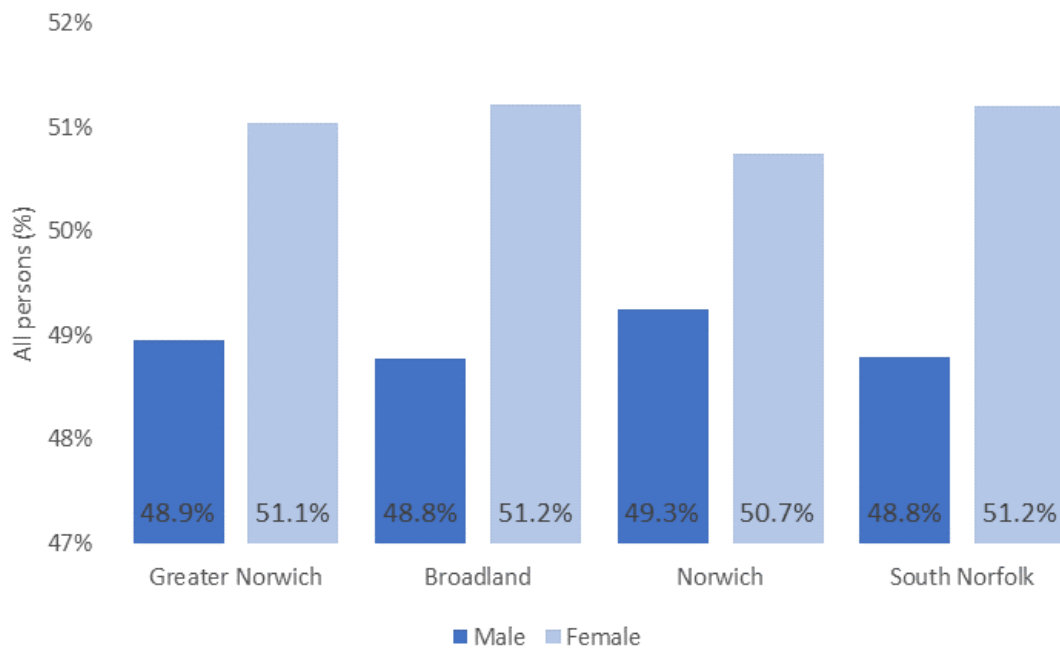


Gender

The population of the Greater Norwich area in the 2011 Census was 381,170. There are slightly more women than men in all districts, although this is slightly less pronounced in Norwich.

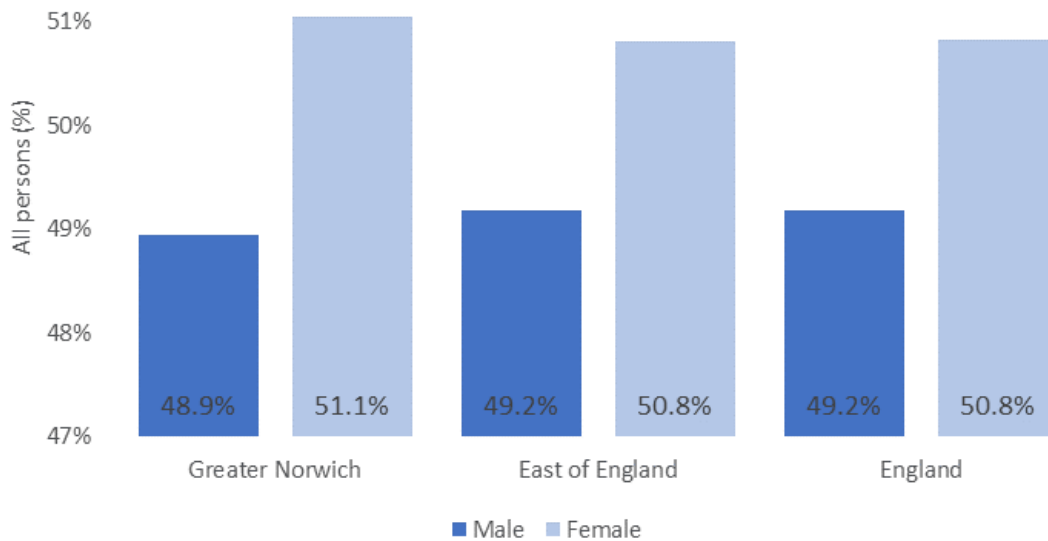
Graph 3: Male and Female Residents (Greater Norwich, Broadland, Norwich, South Norfolk)

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]



The Greater Norwich balance is broadly similar to the regional and national picture.

Graph 4: Male and Female Residents (Greater Norwich, East of England, England)
 Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]



Race

In the 2011 Census 95% of Greater Norwich residents identified themselves as white. This is a higher percentage than regionally or nationally. Within this group, 0.1% identified themselves as a Gypsy or Traveller. Romany Gypsies and Irish Travellers are recognised as having a protected characteristic under the Equality Act 2010. Of the 5% identifying as other than white, there is a wide variety of ethnic backgrounds represented, as can be seen in the table below.

Graph 5: Population by General Ethnic Origin (Greater Norwich, East of England, England)
 Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]

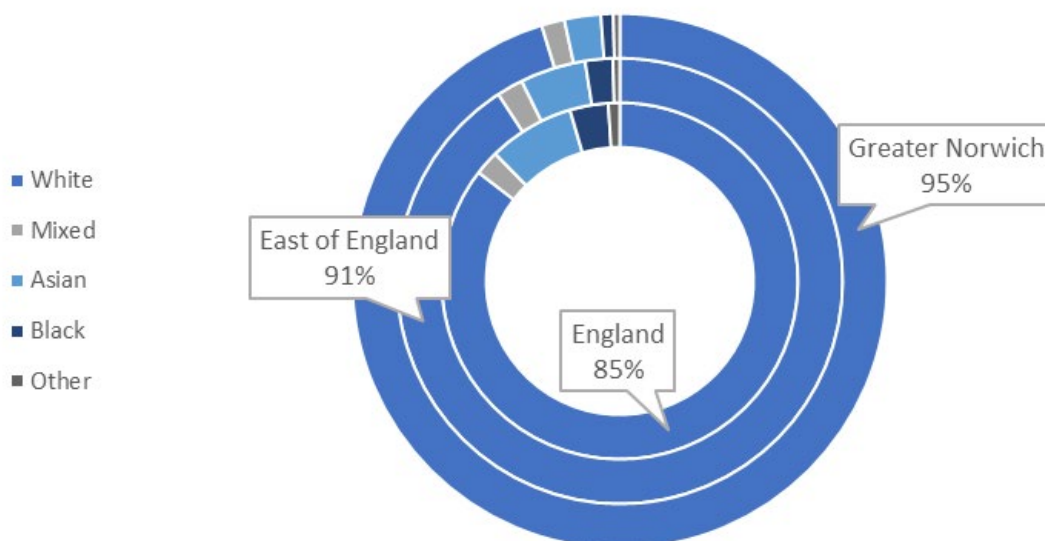


Table 1: Population by Specific Ethnic Origin (Greater Norwich, East of England, England)
 Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]

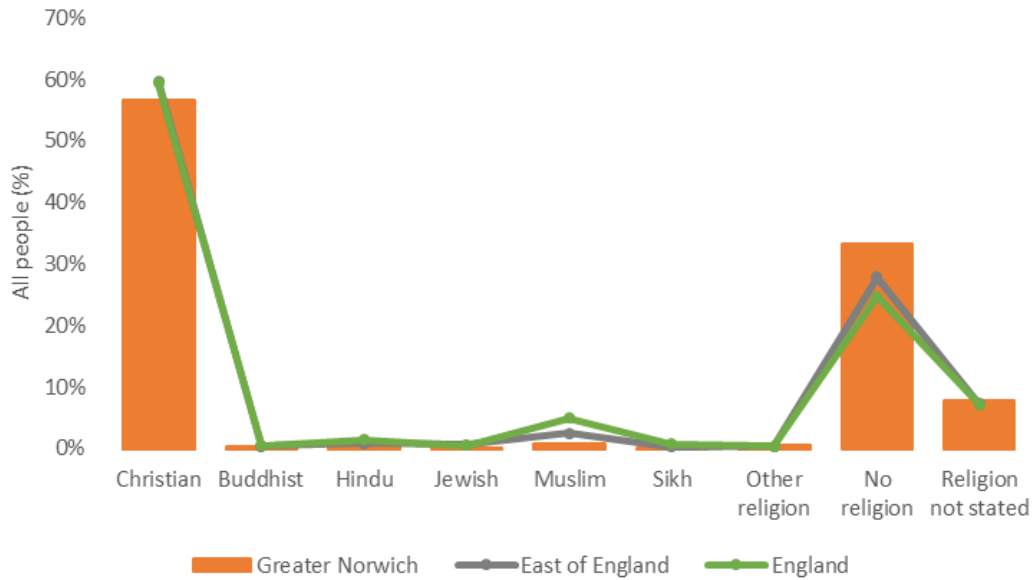
Ethnic Group	Greater Norwich	East of England	England
White	95.3%	90.8%	85.4%
White:	96.3	93.9%	93.4%
English/Welsh/Scottish/Northern Irish/British			
White: Irish	0.5%	1.0%	1.1%
White: Gypsy or Irish Traveller	0.1%	0.2%	0.1%
White: Other White	3.1%	4.9%	5.4%
Mixed	1.4%	1.9%	2.3%
Mixed: White and Black Caribbean	23.8%	33.2%	34.8%
Mixed: White and Black African	18.9%	13.7%	13.5%
Mixed: White and Asian	31.7%	28.7%	27.9%
Mixed: Other Mixed	25.6%	24.3%	23.7%
Asian	2.2%	4.8%	7.8%
Asian/Asian British: Indian	30.1%	31.2%	33.7%
Asian/Asian British: Pakistani	4.3%	23.8%	26.8%
Asian/Asian British: Bangladeshi	8.3%	11.9%	10.5%
Asian/Asian British: Chinese	27.3%	12.0%	9.2%
Asian/Asian British: Other Asian	29.9%	21.1%	19.8%
Black	0.7%	2.0%	3.5%
Black/African/Caribbean/Black British: African	77.5%	59.5%	52.9%
Black/African/Caribbean/Black British: Caribbean	14.1%	28.6%	32.0%
Black/African/Caribbean/Black British: Other Black	8.4%	11.8%	15.0%
Other	0.4%	0.5%	1.0%
Other ethnic group: Arab	54.1%	35.9%	40.3%
Other ethnic group: Any other ethnic group	45.9%	64.1%	59.7%

Religion

In the 2011 Census, 59% of Greater Norwich residents identified themselves as having a religion. The Census did not ask about religious activities or practices, only about respondents' identities. The graph below shows that the most popularly identified religion in Greater Norwich is Christian, although this is slightly lower than the regional or national figure. The proportion of those who were members of other religions was lower when compared to the rest of the region and the country, particularly in the case of respondents identifying themselves as Muslim. A higher percentage of Greater Norwich residents stated that they had 'other' religion compared to respondents in the East of England and England.

Graph 6: Religious Identity (Greater Norwich, East of England, England)

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]

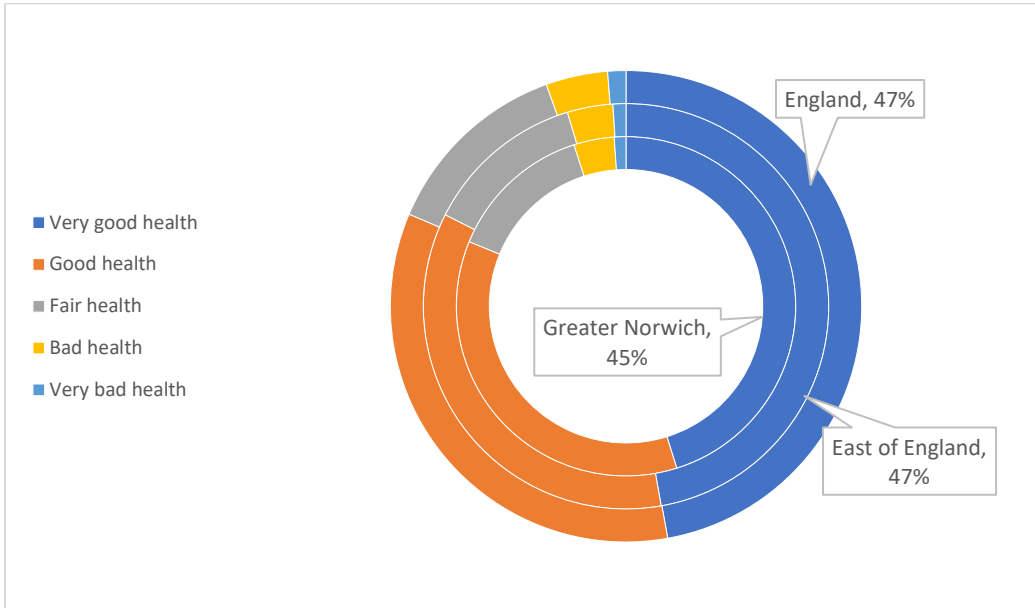


Health & Disability

Census respondents were asked to assess whether their health was very good, good, fair, bad or very bad. The results in Graph 7 show that Greater Norwich is broadly consistent with the national and regional results, although a slightly lower proportion of residents of Greater Norwich believe they are in ‘very good health’. Another Census question asked whether residents had a long-term (12 months +) health problem or disability which limited their day-to-day activities. The results, as shown in Graph 8, show that 8% of Greater Norwich residents have a severely limiting health condition. This equates to the national average, but is slightly higher than the regional average.

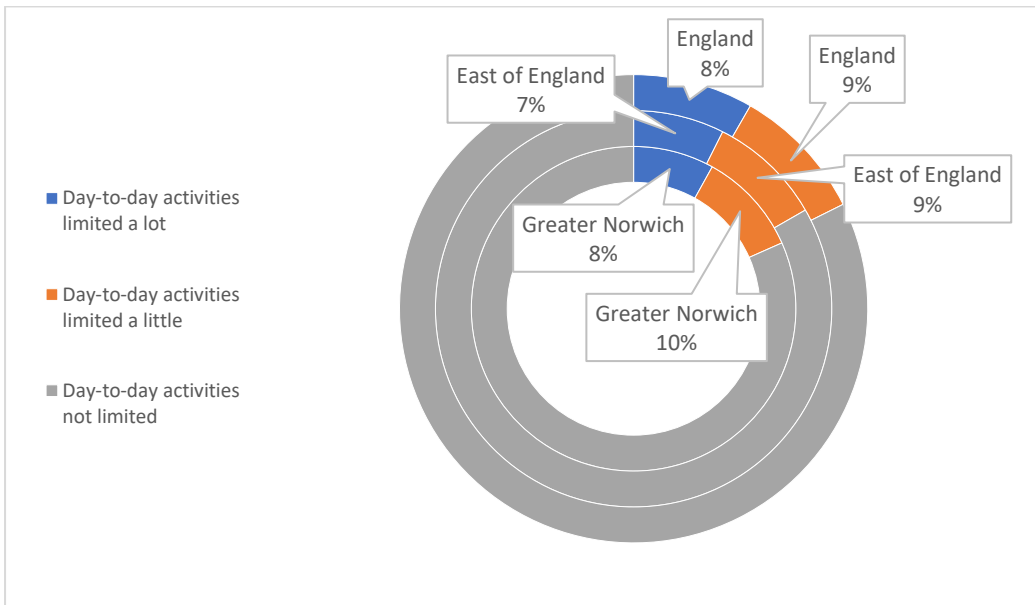
Graph 7: Quality of Health (Greater Norwich, East of England, England)

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]



Graph 8: Long Term Health Problem or Disability (Greater Norwich, East of England, England)

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]



Policy Assessment

The following table illustrates the screening process for all policies in the Regulation 18 Draft Greater Norwich Local Plan. Any negative impact identified on a protected group will result in further consideration of the policy, and depending on the outcome the policy may be subject to full Equalities Impact Assessment.

The table below identifies with a tick (✓) any protected groups which may be impacted positively, and with a cross (✗) any protected groups which may be impacted negatively by each policy in turn. Potential impacts identified are described in the next section, and any actions needed are explored in the conclusion.

GNLP Policy	Age	Gender	Disability/ pregnancy	Race/ religion
1. Sustainable Growth Strategy	✓	N/A	✓	N/A
2. Sustainable Communities	✓	N/A	✓	N/A
3. Environmental Protection and Enhancement	N/A	N/A	N/A	N/A
4. Strategic Infrastructure	✓	N/A	✓	N/A
5. Homes	✓	N/A	✓	✓
6. The Economy	✓	N/A	✓	N/A
7.1 Norwich Urban Area	N/A	N/A	N/A	N/A
7.2 The Main Towns	N/A	N/A	N/A	N/A
7.3 Key Service Centres	N/A	N/A	N/A	N/A
7.4 Village Clusters	N/A	N/A	N/A	N/A
7.5 Small Scale Windfall Housing Development	N/A	N/A	N/A	N/A
Site specific policies - Norwich	Age	Gender	Disability	Race/ religion
Norwich sites GNLP0068, GNLP0133-B, GNLP0133-C, GNLP0133-D & GNLP0133-E, GNLP0282, GNLP0360	N/A	N/A	N/A	N/A
Norwich sites GNLP0401, GNLP0409R, GNLP0451, GNLP0506, GNLP2114	N/A	N/A	N/A	N/A
Norwich sites GNLP2159, GNLP2163, GNLP2164, GNLP3053, GNLP3054	N/A	N/A	N/A	N/A
Norwich sites CC2, CC3, CC4a and CC4b, CC7, CC8, CC10, CC11	N/A	N/A	N/A	N/A
Norwich sites CC16, CC18, CC24, CC30	N/A	N/A	N/A	N/A
Norwich sites R1, R2, R7, R10, R13, R14 and R15, R17, R18, R19, R20, R29	N/A	N/A	N/A	N/A

Site specific policies - Norwich	Age	Gender	Disability/ pregnancy	Race/ religion
Norwich sites R30, R31, R33, R35, R36	N/A	N/A	N/A	N/A
Norwich R37	✓	N/A	✓	N/A
Norwich R38	✓	N/A	N/A	N/A
Norwich R42	✓	N/A	N/A	N/A
Site specific policies – urban fringe	Age	Gender	Disability/ pregnancy	Race/ religion
Colney GNLP0331R-B, GNLP0331R-C, COL1, COL2, COL3	N/A	N/A	N/A	N/A
Costessey COS3, COS4, COS5,	N/A	N/A	N/A	N/A
Cringleford GNLP0307, GNLP0327, KES2	✓	N/A	N/A	N/A
Drayton DRA1	N/A	N/A	N/A	N/A
Easton & Honingham EAS1	✓	N/A	N/A	N/A
Hellesdon HEL1, HEL2, HEL3, HEL4	✓	N/A	N/A	N/A
Rackheath GNLP0351	N/A	N/A	N/A	N/A
Sprowston GNLP0132	N/A	N/A	N/A	N/A
Taverham GNLP0337	✓	N/A	✓	N/A
Trowse TROW1	✓	N/A	N/A	N/A
Site specific policies – towns	Age	Gender	Disability/ pregnancy	Race/ religion
Aylsham GNLP0311, GNLP0595 and GNLP2060, AYL3, AYL4	✓	N/A	N/A	N/A
Diss GNLP0102, GNLP0250 GNLP0342, GNLP0119, GNLP0291, DIS1, DIS2, DIS3, DIS5, DIS8, DIS9	N/A	N/A	N/A	N/A
Harleston GNLP2108, GNLP2136, HAR4, HAR5, HAR6, HAR7	✓	N/A	✓	N/A
Wymondham GNLP0354, GNLP3013	N/A	N/A	N/A	N/A
Site specific policies – key service centres	Age	Gender	Disability/ pregnancy	Race/ religion
Acle GNLP0378, ACL1, ACL2, ACL3	N/A	N/A	N/A	N/A
Blofield GNLP2161	N/A	N/A	N/A	N/A
Brundall BRU2, BRU3	N/A	N/A	N/A	N/A
Hethersett HET1, HET2, HET3	✓	N/A	N/A	N/A
Hingham GNLP0503, GNLP0520, HIN2	N/A	N/A	N/A	N/A
Loddon & Chedgrave GNLP0312, GNLP0463, HAL1, LOD3	N/A	N/A	N/A	N/A
Poringland POR3	N/A	N/A	N/A	N/A
Reepham REP1, REP2	✓	N/A	N/A	N/A

Site specific policies – Broadland villages	Age	Gender	Disability/ pregnancy	Race/ Religion
Blofield Heath GNLP1048, BLO5	N/A	N/A	N/A	N/A
Buxton with Lamas GNLP0297, BUX1	N/A	N/A	N/A	N/A
Cawston GNLP0293, CAW1, CAW2	✓	N/A	N/A	N/A
Coltishall GNLP2019, COL1, COL2	N/A	N/A	N/A	N/A
Foulsham GNLP0605, FOU2	N/A	N/A	N/A	N/A
Freethorpe GNLP2034, FRE1	N/A	N/A	N/A	N/A
Gt Witchingham GNLP0608	N/A	N/A	N/A	N/A
Horsford, Felthorpe & Haveringland GNLP0264	N/A	N/A	N/A	N/A
Horsham & Newton St Faith GNLP0125, HNF1, HNF2, HNF3	✓	N/A	N/A	N/A
Lingwood GNLP0379, GNLP0380	N/A	N/A	N/A	N/A
Marsham GNLP2143	N/A	N/A	N/A	N/A
Reedham GNLP1001, GNLP3003	N/A	N/A	N/A	N/A
Salhouse GNLP0188	N/A	N/A	N/A	N/A
South Walsham GNLP0382, SWA1	✓	N/A	N/A	N/A

Positive impact ✓	Negative impact ✗	Not applicable N/A
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Potential Impacts

Strategic Policies’ Impacts

1. Sustainable Growth Strategy directs the majority of growth to locations with services. This will benefit people with reduced mobility, such as those with poor health, a physical disability or older residents.
2. Sustainable Communities emphasises the importance of access to local services and requires a Health Impact Assessment for applicable schemes. This will benefit people with reduced mobility, such as those with poor health, a physical disability or older residents.
4. Strategic Infrastructure requires provision of on-site services, and transport improvements. This will benefit people with reduced mobility, such as those with poor health, a physical disability or older residents. The policy also ensures that health provision is considered fully, and health providers are involved as fully as

possible in strategic growth decisions. This will benefit pregnant women and those with poor health.

5. Homes identifies policy requirements for older people's housing, accessible and adaptable homes, sites for Gypsies and Travellers. This will benefit older people, those with a physical disability requiring adaptive housing, and residents identifying as Gypsies or Travellers.

6. The Economy concentrates development of new services according to a hierarchy of centres which correlates to densely populated areas. The co-location of housing with services will benefit people with reduced mobility, such as those with poor health, a physical disability or older residents.

Site Specific Policies' Impacts

In Norwich, carried forward policy R37 the Norwich Community Hospital site, is allocated for hospital development and ancillary activities, plus associated supported living, care and key worker accommodation, and residential development. Although all local residents have potential to benefit from this allocation, the policy will particularly support older residents or those with disabilities or poor health.

R38 makes provision for significant areas of recreational and informal open space and play space. This will particularly benefit children of various ages.

R42 allocates housing for older people, including some care provision. This will benefit older residents.

Some other Norwich site policies refer to open space, community or education facilities, but there is no specific allocation which creates a positive impact on any protected group.

Cringleford GNLP0307, GNLP0327 requires land for a new primary school and enhanced walking routes to nearby schools. These elements will benefit children of primary school age, although the improvements to walking routes will benefit pedestrians of all ages.

Easton & Honingham EAS1 requires expansion of the local primary school and provision of pedestrian and cycle links to Ormiston Victory Academy and Easton College. This would benefit young people.

Hellesdon HEL2 safeguards a site for school provision. This will benefit children of school age.

Taverham GNLP0337 requires provision of a new primary school and medical care facility. This will benefit children of school age and (depending on the type of medical facility) people with poor health as well as the rest of the population.

Trowse TROW1 requires a new primary school. This will benefit children of primary school age.

Aylsham GNLP0311, 0595 and 2060 requires a primary school. This will benefit children of primary school age.

Harleston GNLP2136 requires care and community facilities, HAR5 requires health and community facilities. These facilities would benefit older people and those with poor health as well as the wider population.

Hethersett HET1 requires a new or expanded school and HET2 requires a care home. These facilities will benefit young children and older people respectively.

Reepham REP1 requires provision of a sports hall for the high school. This will benefit children of high school age.

Cawston GNLP0293 requires provision of a pedestrian crossing to reach the primary school. Although primarily of benefit to primary age children, the crossing will benefit other residents also.

Horsham & Newton St Faith HNF1 includes a potential to include play space. If this is delivered, it will benefit children.

South Walsham GNLP0382 requires provision of a footpath to the school. This will benefit children of school age but also be used by other residents.

Whole Plan Impacts

Having considered each individual policy within the plan, it is important to address the draft GNLP holistically, to assess any adverse impact upon any group with 'protected characteristics', and establish whether the plan encourages greater equality between different groups. Applying the Public Sector Equality Duty to the entire Draft Greater Norwich Local Plan (GNLP), is there any impact (positive or negative) on any particular group related to:

Age

Young children require schools and play opportunities to be closely located to their homes. Also for adults in older age, access to services becomes more important. Both these age-related issues are addressed in the GNLP's strategic approach to direct housing growth to clusters of services. Additionally, some site policies require provision of or expansion of local services.

Gender

No distinction has been identified related to land use. Therefore, the policies within the GNLP are considered to have a neutral impact on gender.

Race, Religion or Belief

There is no provision within the draft Greater Norwich Local Plan for places of worship or cultural development specifically related to faith or race. However, allocations for places of worship are unusual; such developments may be better addressed by a Development Management policy. Development Management policies adopted by the partner authorities are not under review in the GNLP. Therefore, while these elements are not included in the GNLP, this is not considered to be a significant negative impact.

The area has a small number of ethnic minority residents. Of these, the group which has land use needs which can be directly impacted by a local plan is Gypsies and

Travellers. National planning policy sets a planning definition for Gypsies and Travellers that requires evidence of a nomadic lifestyle. However, residents who identify as a Romany Gypsy or Irish Traveller would be protected under the Public Sector Equality Duty, requiring culturally appropriate accommodation regardless of whether they travel or not. The evidence base for the GNLP includes the Norfolk Caravans and Houseboats Accommodation Needs Assessment (2017). This found that across Greater Norwich, for Gypsies and Travellers who have not permanently ceased to travel, 15 pitches are needed between 2017 and 2022, and a further 51 pitches from 2022 to 2036. The planned expansion of an existing site in Norwich meets the need up to 2022. For those who no longer travel, 91 pitches are needed for Residential Caravan dwellers between 2017 and 2022, rising to a total of 106 by 2036. The GNLP does not allocate additional pitches to meet this need, as no sites have been submitted for this use. However, question 30 of the consultation on the draft GNLP does invite additional sites to be submitted for this use.

Disability

While the range of potential disabilities may result in a wide range of physical limitations, the aspect which a local plan has scope to address is limited mobility. The draft GNLP has a range of policies which aim to improve access to services for all residents, seeks a percentage of adaptive homes, encourages use of Building for Life 12, and requires a Health Impact Assessment for some schemes.

Summary of Impacts

The settlement hierarchy approach aims to co-locate homes with services as far as possible. Those with limited mobility or access to transport (including those with protected characteristics such as pregnant women, young parents, people with certain disabilities, the elderly) will particularly benefit from having a healthy mix of shops and services close to home.

Site policies requiring provision of facilities such as open space or road crossings to schools will benefit a wider range of residents than the original target sector. The detail of what is required for elements such as open space will be dictated by the existing provision in the locality at the time of development, but when such facilities are provided, there should be full consideration of the needs of the sectors of the community with protected characteristics, such as mother & toddler facilities or parking spaces, seating for older people, allowing access to those with restricted mobility, and clear signage. The needs of those with limited mobility or sight should be borne in mind when landscape or green infrastructure is delivered. In particular, decisions regarding seating, pathways and planting should consider the needs of these groups, and ongoing maintenance is important, particularly regarding trip hazards or overhanging vegetation for those with impaired vision. Provided that footpaths are of a suitable width and surface treatment, they would be appropriate for mobility scooters, wheelchairs, pushchairs, etc.

However, these are matters to be considered at planning application stage, and are also covered by other legislation and guidance, such as the Disability Discrimination Act, building regulations and Building for Life 12 (encouraged by policy 2). It is not considered that a strategic document such as the Draft Greater Norwich Local Plan

should specify this level of detail, and therefore it is not considered that the document requires further assessment of equalities impact in this respect.

Although Policy 5 identifies criteria for provision, there is no site allocation within the draft Greater Norwich Local Plan for Gypsies and Travellers, a key ethnic minority in the area. Housing needs for this group are addressed through the criteria in policy 5 and development management policies already in place in the districts. Furthermore, additional sites are invited through the consultation process, for potential allocation in the Regulation 19 document. However, the lack of allocated sites at this stage is considered to be a potential negative impact for this protected group if no sites are allocated at Regulation 19.

Other than this element, there is low potential for a disproportionate negative impact on residents from protected groups or on the relationships between groups. Indeed, several potential benefits have been identified from the policy requirements on sites and overarching policies for all sectors of the community, for example improved accessibility to services.

Monitoring

The effectiveness of a local plan is measured through various indicators collectively referred to as a monitoring framework. The effectiveness of the site policies will be measured by the planning application decisions on allocated sites. For all area-wide policies, the preferred approach is to monitor the objectives of the GNLP according to various themes. Therefore the protected characteristics of age, disability and race/religion will be monitored through the following.

Indicator Code	Theme (protected group)	Indicator
GNLP Communities objective – To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities, helping to close the gap between life chances in disadvantaged and other communities.		
GNLP2	Education (children)	To improve the district authority ranking for access to education, skills and training, taken from the English Indices of Multiple Deprivation.
GNLP3	Education (children)	To minimise the number of planning approvals granted contrary to the advice of Norfolk County Council Education department, based upon the proximity to or capacity of local school provision.
GNLP4	Health (disabled)	To improve the district authority ranking for Improving health and wellbeing by measuring the risk of premature death and the impairment of quality of life through poor physical or mental health, taken from the English Indices of Multiple Deprivation.

Indicator Code	Theme (protected group)	Indicator
GNLP5	Health (disabled)	To minimise the number of planning approvals granted contrary to the advice of NHS organisations or Public Health Norfolk, based upon the capacity of healthcare provision or incompatibility with public health objectives.
GNLP Homes objective – To enable delivery of high-quality homes of the right density, size, mix and tenure to meet people’s needs throughout their lives and to make efficient use of land.		
GNLP35	Gypsy and Traveller sites (ethnic Gypsies and Travellers)	To monitor the number of Gypsy and Traveller pitches granted planning permission against the requirements of the accommodation needs assessment.
GNLP37	Adaptable housing (disabled)	Percentage of sites of 10 or more homes where 20% are accessible and adaptable, as defined by Building Regulation M4(2).
GNLP41	Transport and access to services (disabled, children, elderly)	To improve the district authority ranking for reducing the barriers to housing and services, taken from the English Indices of Multiple Deprivation.

Languages

All of the policies listed within the Draft Greater Norwich Local Plan, together with the supporting text and appendices, will be available in different languages upon request. The Draft Greater Norwich Local Plan has been written in plain English where possible and technical jargon and acronyms have been avoided where possible. In some cases, technical language has been considered necessary, but a glossary has been provided.

Conclusion

Although it is considered that (other than the absence of allocated Gypsies & Travellers’ sites) the Draft Greater Norwich Local Plan has little impact on the equality of protected groups, there may be opportunities to enhance the life opportunities of some protected groups at planning application stage. No further Equalities Impact Assessment is considered necessary for this policy document.