

Greater Norwich Local Plan Equality Impact Assessment Addendum (October 2023)

Assessing the impact of the local plan policies on different sections of the community and its potential to address socio-economic inequality

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Introduction

1. The purpose of this report is to underpin the evidence base for the Greater Norwich Local Plan (GNLP) to demonstrate that it has been prepared in accordance with the Equality Act 2010. The Equality Act requires local authorities to ensure their activities promote improved equality and do not adversely impact groups of people whose characteristics are protected by law. These protected characteristics under the Equality Act are:
 - age;
 - disability;
 - gender reassignment;
 - marriage and civil partnership (section 149 (1) (a) only);
 - pregnancy and maternity;
 - race;
 - religion or belief;
 - gender; and
 - sexual orientation.
2. This report builds upon the GNLP's Equality Impact Assessment (EqIA) which was published in 2020 to accompany the submission version of the plan ([A10](#)). This document is an addendum to the above. It considers the final version of the plan prior to its adoption by the Greater Norwich authorities of Broadland, Norwich, and South Norfolk councils.
3. This approach is good practice because the content of a local plan changes over time, as a local plan takes several years to prepare, including substantial public consultation and an examination held by inspectors appointed by the Secretary of State.
4. The GNLP provides strategic policies and site allocations to guide land-use planning decisions across the authorities of Broadland, Norwich, and South Norfolk until 2038, shaping where and how new developments will be built. Assessing the GNLP under the Public Sector Equality Duty is a statutory responsibility.

Methodology

5. The 2020 EqIA considered the evolving policies of the GNLP against equalities issues, scoring each policy as either 'positive', 'negative', or 'not applicable'. This addendum to the EqIA continues this approach by considering the policies now that they are close to adoption.
6. The scoping exercise that underpinned the 2020 EqIA is unaltered for this addendum. The GNLP remains relevant to some protected groups and to addressing socio-economic issues but is not of relevance to all groups defined in the Equality Act. As stated in the 2020 EqIA, the protected characteristics of gender reassignment, sexual orientation and marriage/civil partnership are

scoped out because land-use policies in local plans are unlikely to affect personal identity, relationships, or sexual preferences.

7. Potential exists for some equalities issues to be affected by land-use policies and as the 2020 EqlA found these protected characteristics are:
 - age;
 - disability;
 - gender;
 - pregnancy
 - race; and,
 - religion or belief.

8. The 2020 EqlA found that some protected groups can be assessed together because the impacts arising from land-use policies are similar. For example, anyone with a health issue, whether that be temporary or ongoing due to age, disability or pregnancy, will benefit from land-use policies that ensure health services are closer to home and can be reached by modes of transport other than the private car.

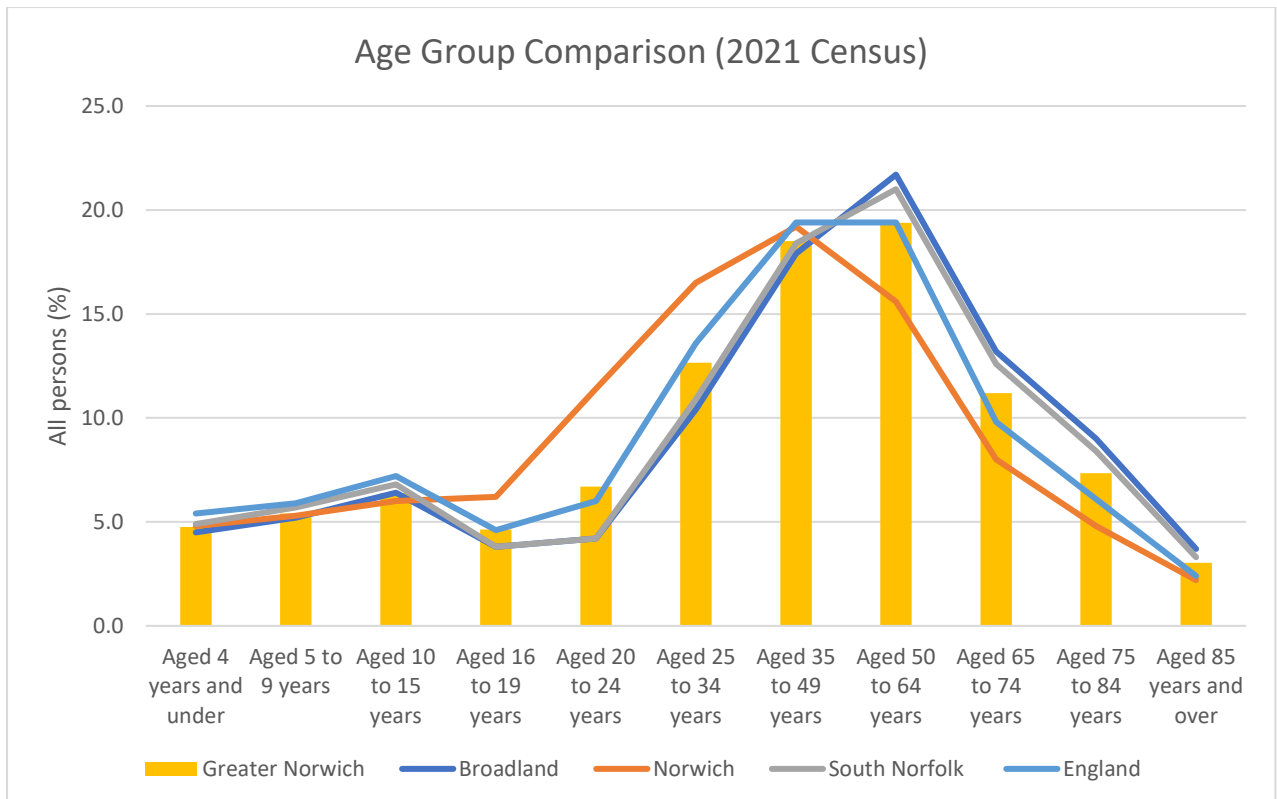
Greater Norwich Context

9. This section gives an overview of social diversity in Greater Norwich. To supplement the 2020 EqlA, this section uses data from the 2021 Census.

Age

10. The 2020 EqlA identified that there is a high proportion of university-aged young people in Norwich and a high proportion of people of retirement age in Broadland and South Norfolk. These features of Greater Norwich's population remain evident in the 2021 Census.

Graph 1: Age Group Comparison (Broadland, Norwich, South Norfolk, Greater Norwich and England)
2021 Census Area Profiles, downloaded August 2023, <https://www.nomisweb.co.uk/>

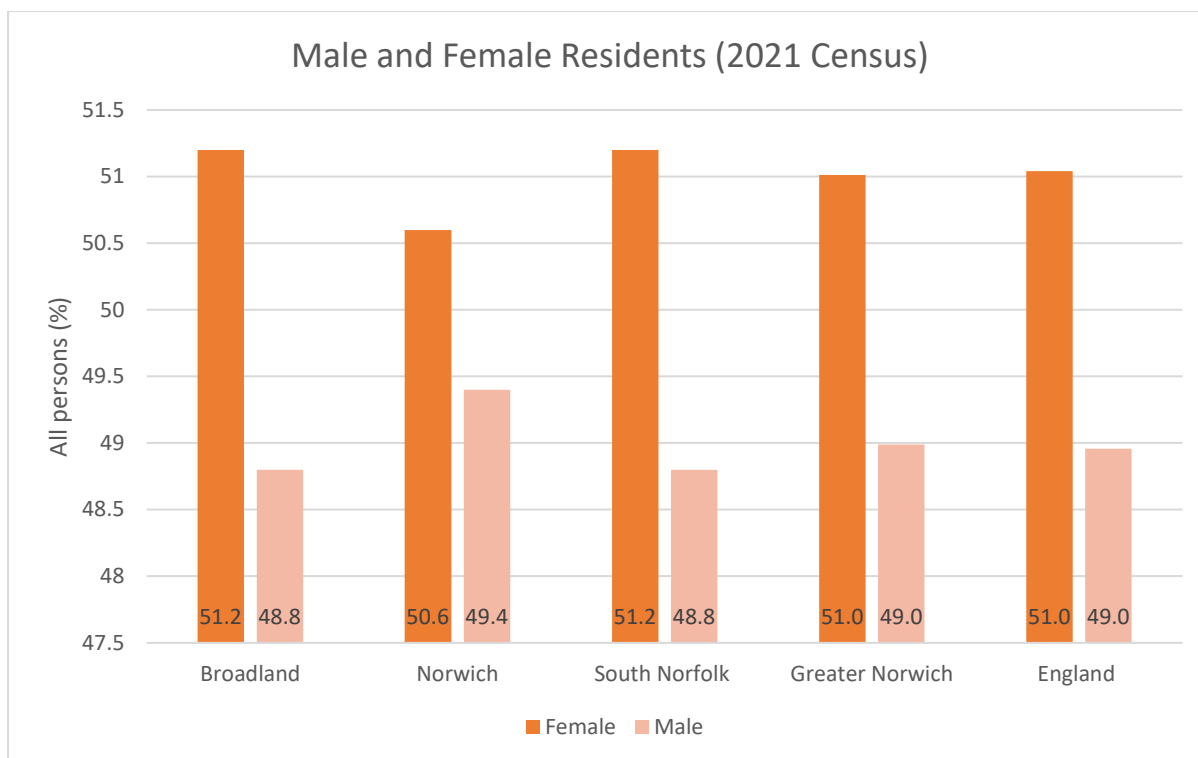


Gender

11. The 2020 EqIA identified that the gender profile of Norwich is the closest to a 50/50 split of male to female, and this is still the case in the 2021 Census.

Graph 2: Male and Female Residents (Broadland, Norwich, South Norfolk, Greater Norwich, and England)

2021 Census Area Profiles, downloaded August 2023, <https://www.nomisweb.co.uk/>

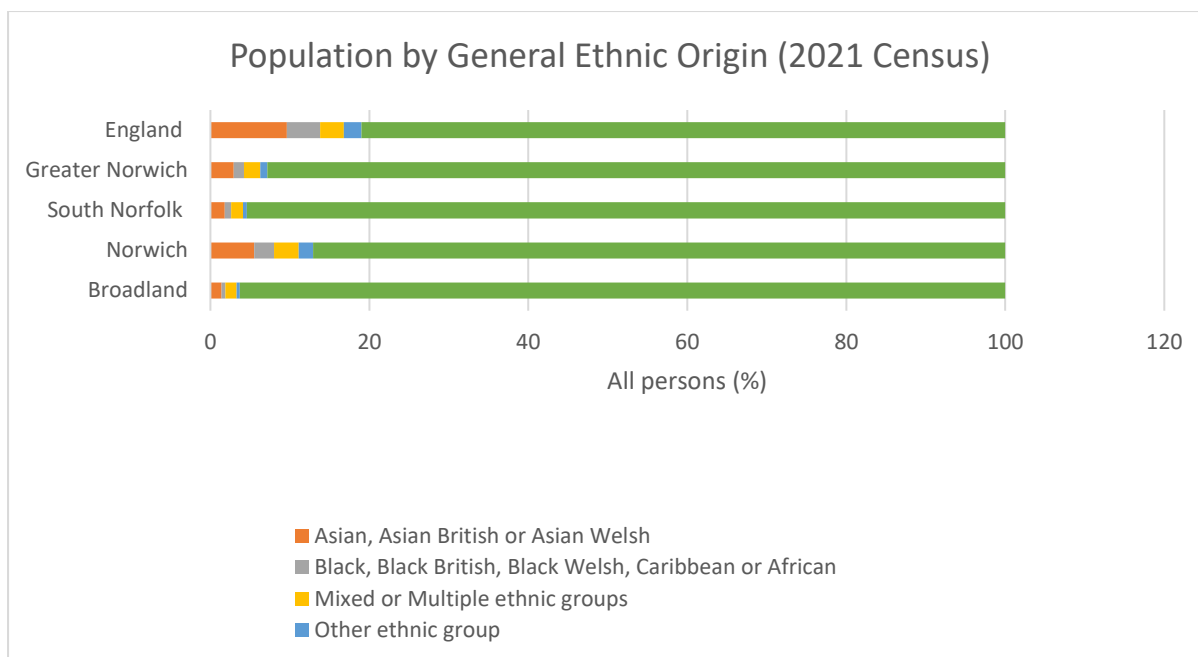


Race

12. As stated in the 2020 EqIA, Greater Norwich continues to have a higher proportion of people who identify themselves as White at 92.9% compared to the national average of 81%. In the 2011 Census 95.3% of people in Greater Norwich identified as White, meaning the proportion of people from ethnic minority groups is increasing.

Graph 3: Population by General Ethnic Origin (Broadland, Norwich, South Norfolk, Greater Norwich, and England)

2021 Census Area Profiles, downloaded August 2023, <https://www.nomisweb.co.uk/>



13. The 2020 EqIA particularly identified Gypsies and Travellers as an ethnic group that could potentially be impacted by the GNLP's policies. This is because living in caravans is characteristic of this ethnic group's needs and local plan policies directly impact on the supply of pitches.

14. The 2021 Census shows that out of 417,595 people in Greater Norwich, 424 identified themselves as an ethnic Gypsy and Traveller, equalling 0.10% of the population. This compares to 0.12% across England as a whole. The Gypsy and Traveller population in Greater Norwich increased by 70 people between the 2011 and 2021 Census.

Table 1: Gypsy and Traveller Population Change 2011 to 2021
 2011 and 2021 Census, Ethnic Group 'All Categories' and 'White: Gypsy or Irish Traveller' downloaded August 2023, <https://www.nomisweb.co.uk/>

Gypsy and Traveller Population Change 2011-2021	Broadland	Norwich	South Norfolk	Greater Norwich	England
Gypsy and Traveller population (increase/decrease)	16	87	-33	70	12,873
Gypsy and Traveller population (% difference)	27%	41%	-22%	17%	19%

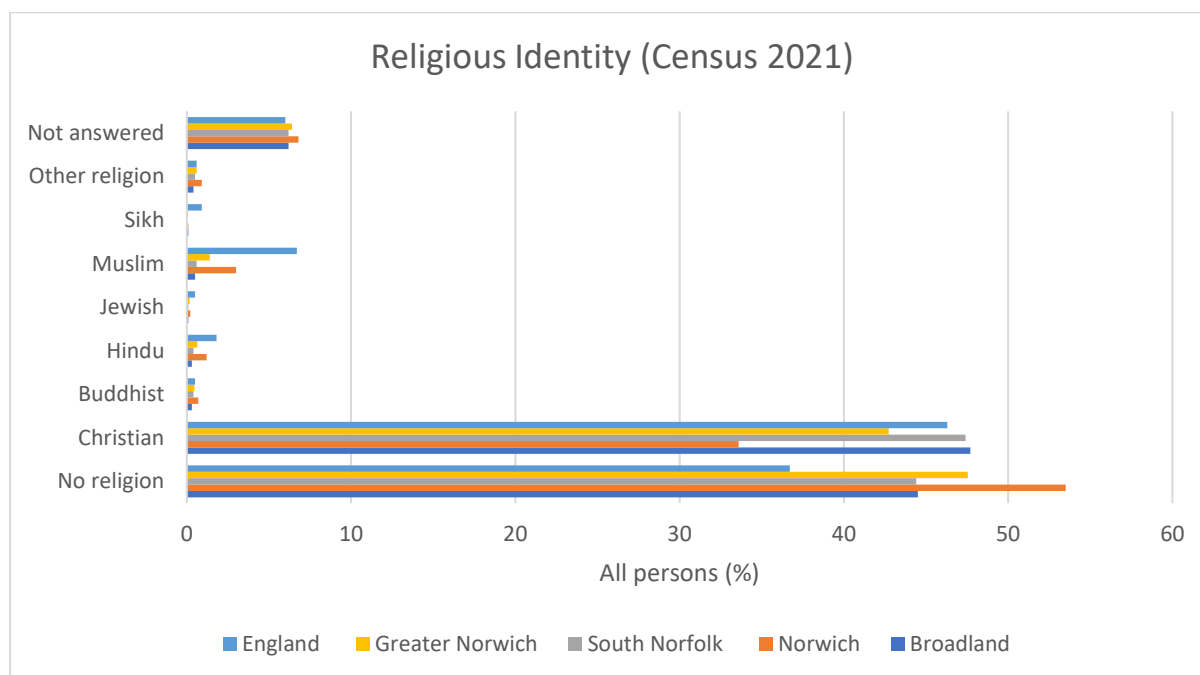
Religion

15. The 2020 EqIA identifies that "Christian" is the most common religious identity in Greater Norwich, and the 2021 Census shows the same result. As also found by

the 2020 EqIA, the proportion of people in Greater Norwich who have other religious identities is lower than in the rest of the country, and the proportion of people saying they have no religion is higher than the rest of England.

Graph 4: Religious Identity (Broadland, Norwich, South Norfolk, Greater Norwich, and England)

2021 Census Area Profiles, downloaded August 2023, <https://www.nomisweb.co.uk/>

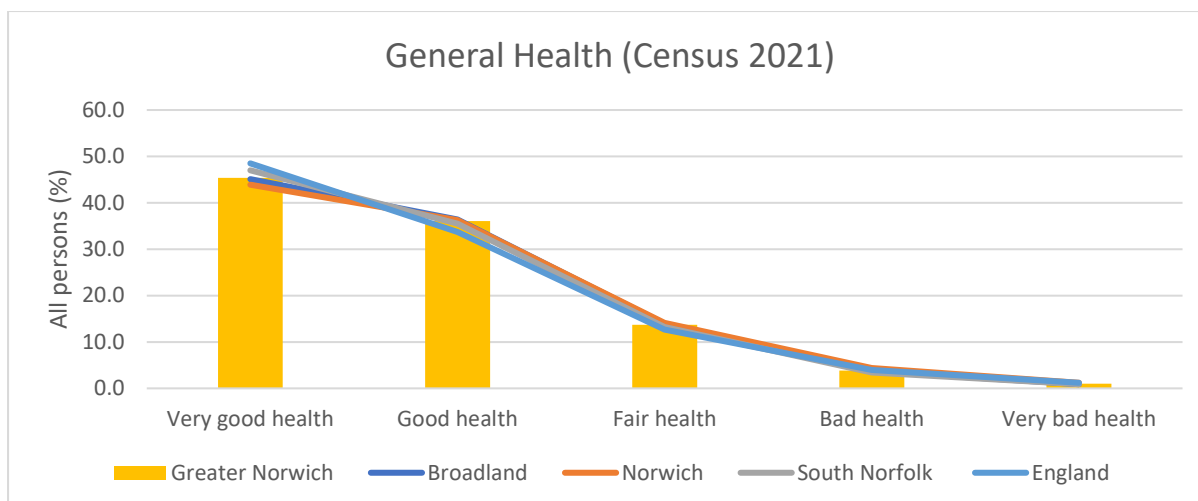


Health & Disability

16. The 2020 EqIA states that the health of people in Greater Norwich is broadly consistent with the national and regional results, and the 2021 Census shows a similar profile.

Graph 5: General Health (Greater Norwich, Broadland, Norwich, South Norfolk, and England)

2021 Census Area Profiles, downloaded August 2023, <https://www.nomisweb.co.uk/>

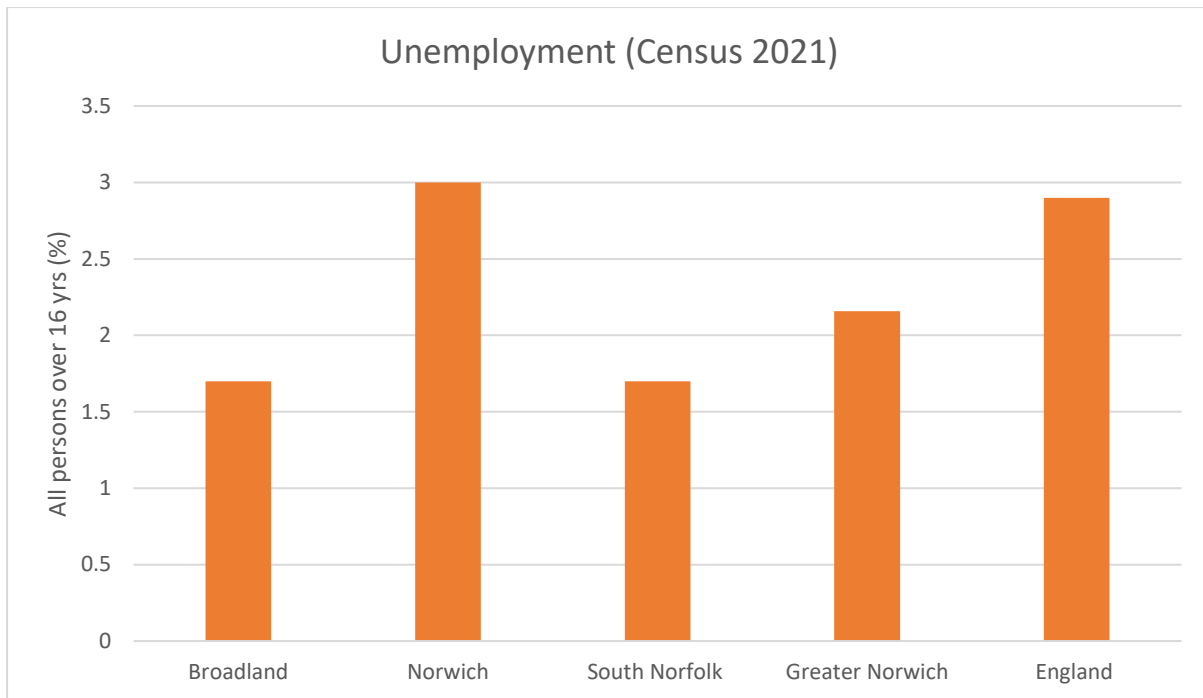


Socio-economic Disadvantage

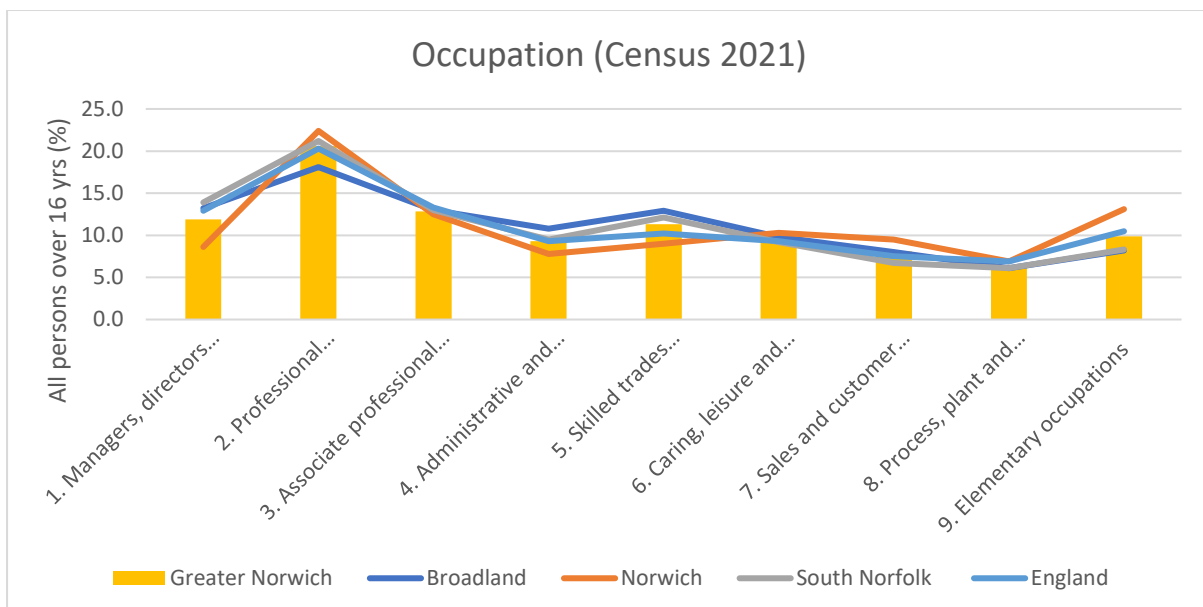
17. Greater Norwich is generally relatively prosperous, but as stated in the 2020 EqIA there are localised areas with high levels of deprivation. Greater Norwich's rate of unemployment of 2.2% compares favourably to the countrywide rate of 2.9%, although unemployment runs at a slightly higher rate of 3% in Norwich city.
18. The workforce occupation statistics show a similar distribution of job types across Greater Norwich to England's as a whole. There is a slight difference in that there are proportionally more people working in the middle-ranking classifications of 'Skilled trades occupations', 'Caring, leisure and other service occupations', and 'Sales and customer service occupations' in Greater Norwich than nationally.

Graph 6: Unemployment (Broadland, Norwich, South Norfolk, Greater Norwich, and England)

2021 Census Area Profiles, downloaded August 2023, <https://www.nomisweb.co.uk/>



Graph 7: Occupation (Broadland, Norwich, South Norfolk, Greater Norwich, and England)
 2021 Census Area Profiles, downloaded August 2023, <https://www.nomisweb.co.uk/>



Assessment

19. Table 2 below illustrates the updated screening process for all policies in the GNL P, mirroring the process used in the 2020 EqIA. The table covers the modified policies that will make up the final adopted plan.
20. The table identifies any protected groups which may be impacted positively with a tick (✓), and any protected groups which may be impacted negatively with a cross (✗). Where a policy is not likely to directly impact upon equalities-related issues it is scored as not applicable (N/A).
21. Paragraphs 22 to 37 briefly set out the focus of the strategic GNL P policies, changes that have been made to them through the examination and the reasoning for the equalities impacts identified in table 2.

Impacts of Strategic Policies

Table 2: Positive and Negative Impacts for GNL P Part 1 Strategy Policies

GNL P Policy	Age	Gender	Disability / pregnancy	Race/ religion	Socio-economic
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	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	N/A
7.2 The Main Towns	N/A	N/A	N/A	N/A	N/A
7.3 Key Service Centres	N/A	N/A	N/A	N/A	N/A
7.4 Village Clusters	N/A	N/A	N/A	N/A	N/A
7.5 Self-build and Custom-build Windfall Housing	N/A	N/A	N/A	N/A	N/A

Positive impact ✓	Negative impact ✗	Not applicable N/A
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Policy 1 Sustainable Growth Strategy

22. This is the key policy in the plan as it outlines the broad strategic approach to housing, employment and infrastructure growth. Focusing jobs and homes in the Norwich urban area creates more opportunity for walking, cycling and using public transport, which reduces longer journeys by private car. It also helps poorer households to choose more affordable options to travel to work and to reach facilities.

23. Following the examination, the total amount of housing growth will be reduced from the figure of 49,500 set out in the submission version of the plan to 45,041. Despite this fall in the overall numbers of homes, the findings of the 2020 EqIA remain appropriate as the plan's strategy for growth will continue to locate new homes close to services. Doing so will benefit people with reduced mobility, such as those with poor health, a physical disability or older residents, and increasing the housing stock will address overcrowding and sub-standard housing.

Policy 2 Sustainable Communities

24. This policy details the design issues which all developments must address to be sustainable, ensuring all new developments are well-designed, built to high standards and promote local access to services. Changes to the policy made through the examination reflect changes to Building Regulations and the Government's emphasis on design coding new developments. The 2020 EqIA findings are unchanged as the policy will continue to benefit people with reduced mobility, such as those with poor health, a physical disability, or older residents.

Policy 3 Environmental Protection and Enhancement

25. This policy addresses the requirements for conserving and enhancing our natural and built environment and heritage. Changes were made to the policy through the examination due to the need to provide policy coverage on nutrient levels in river catchments. Despite these changes, as concluded in the 2020 EqIA, Policy 3 is not directly applicable to equalities issues.

Policy 4 Strategic Infrastructure

26. Policy 4 identifies how growth will be supported and delivered through infrastructure improvements. New and improved infrastructure is especially relevant to people who are less able to travel longer distances regularly by private car or rely more on healthcare services.

27. As the 2020 EqIA finds, Policy 4 potentially benefits protected groups such as those with physical disabilities or older residents. Limited changes have been made to Policy 4 through the examination, and it continues to provide positive impacts. These positive impacts are reinforced by the list of projects and organisations that will coordinate work to deliver infrastructure. This list is in Appendix 1 of the plan.

Policy 5 Homes

28. The 2020 EqIA identified potential positive impacts from Policy 5. These continue to apply following the limited changes made through the plan's examination. The policy supports the provision of older people's housing, accessible and adaptable homes, and pitches for Gypsies and Travellers. Increasing the stock of affordable housing is relevant to tackling overcrowding and sub-standard housing, and thereby contributes to reducing socio-economic disadvantage.

Policy 6 The Economy

29. This policy has undergone limited changes through the local plan examination and its equalities impacts remain the same. Co-locating jobs, homes and services in sustainable locations benefits people who may find travelling longer distances more difficult, such as those with a disability or older residents. The policy also helps to address socio-economic disadvantages by making it easier for people without private transport to reach jobs, training, and education facilities and opportunities.

Policy 7 Strategy for the areas of growth (Policies 7.1, 7.2, 7.3, 7.4, and 7.5)

30. The 2020 EqIA states that due to its strategic nature, Policy 7 does not have an impact on equalities issues. However, its value is to link the Part 1 Strategy of the GNLP with the Part 2 Sites Plan, which in turn will guide the construction of sustainably located new developments.

31. This addendum maintains the same approach as the 2020 EqIA in concluding that equalities issues are not directly relevant to Policy 7. Nevertheless, consideration of the modified Policy 7 remains relevant because of its interrelationship with the Part 2 Sites Plan.

32. The majority of Policy 7 is divided into the separate elements of the plan's settlement hierarchy:

- 7.1 Norwich Urban Area,
- 7.2 Main Towns,
- 7.3 Key Service Centres,
- 7.4 Village Clusters.

33. This hierarchy of urban, suburban, town and village development relates to equalities issues by ensuring that the great majority of people are not disadvantaged by having limited access to facilities and services.

34. Changes made through the examination process have had a limited effect on Policy 7 and the Sites Plan by removing a small number of sites at different levels of the hierarchy.

35. The overall emphasis of focusing most of the development in the Norwich urban area is unaltered, with the plan guiding almost 28,000 additional homes and 257 hectares of undeveloped employment land to the Norwich urban area.

36. Across the rest of the settlement hierarchy, around 6,700 additional homes and 22 ha of employment land are directed to the main towns, 3,800 additional homes and 11.8 ha of employment land to the Key Service Centres, and 3,900 homes to the village clusters, including sites for at least 1,200 homes which will be allocated through the South Norfolk village clusters plan.

37. Policy 7.5 has been significantly modified in comparison with the policy assessed by the EqIA in 2020, and policy 7.6 on new settlements has been deleted.

38. The changes to Policy 7.5 specifically focus on self-build and custom-build housing in small clusters of no more than three dwellings in edge of village and rural locations.
39. Policy 7.6 has been replaced by positive text on the potential role of new settlements in future plan-making. Whilst significant to plan-making, these changes are not directly relevant to equalities issues.

Impacts of Site Specific Policies

40. As a result of the examination process the Part 2 Sites Plan has been restructured compared to the version prepared in 2020. This addendum consequently follows the structure of the modified Sites Plan.
41. Tables 3 to 11 below provide an equalities assessment of specific site allocations, followed by a commentary in paragraphs 41 to 56 which briefly sets out changes that have been made to site allocation policies through the examination and the reasoning for the equalities impacts identified in tables 3 to 11.

Table 3: Impact of Part 2 Sites Plan Strategic Sites

Strategic Sites	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
GNLP0360/3053/R10: East Norwich Strategic Regeneration Area (STR.01)	✓	N/A	N/A	N/A	✓
GNLP0506: Anglia Square (STR.02)	N/A	N/A	N/A	N/A	✓
GNLP1061R: Land known as 'Site 4' Norwich Airport (STR.03)	N/A	N/A	N/A	N/A	✓
R38: Three Score, Bowthorpe (STR.04)	✓	N/A	N/A	N/A	N/A
COL1 / GNLP0331BR / GNLP0331CR (Sites combined to one allocation): Land adjacent to Norwich Research Park (NRP), Colney. South of Norwich Research Park extension, Colney (STR.05)	✓	N/A	✓	N/A	✓
COS3/GNLPSL2008: Longwater Employment Area, Costessey (STR.06)	N/A	N/A	N/A	N/A	✓
GNLP0307/GNLP0327: Land north of the A11, (Cringleford Neighbourhood Plan HOU1), Cringleford (STR.07)	✓	N/A	N/A	N/A	✓
EAS1: Land south and east of Easton (STR.08)	✓	N/A	N/A	N/A	✓
HEL2: Land at Royal Norwich Golf Club, either side of Drayton High Road, Hellesdon (STR.09)	✓	N/A	N/A	N/A	✓

Strategic Sites	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
GNLP0132: Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (STR.10)	✓	N/A	N/A	N/A	N/A
GNLP0337R: Land between Fir Covert Road and Reepham Road, Taverham (STR.11)	✓	N/A	✓	N/A	N/A
HETHEL2: Land south and south west of Lotus Cars, Hethel (STR.12)	N/A	N/A	N/A	N/A	✓
HET1 (part of GNLP0177A): Land north of Hethersett (STR.13)	✓	N/A	N/A	N/A	N/A
HNF2/GNLP0466R: Land east of the A140 and north of Norwich International Airport, Horsham St Faith (STR.14)	✓	N/A	N/A	N/A	✓

Table 4: Impact of Part 2 Sites Plan Norwich City Centre

Norwich City Centre	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
GNLP0409AR: Land at Whitefriars (NCC.01)	N/A	N/A	N/A	N/A	✓
GNLP0409BR: Land south of Barrack Street (NCC.02)	N/A	N/A	N/A	N/A	✓
CC4a: Land at Rose Lane/Mountergate (NCC.03)	N/A	N/A	N/A	N/A	✓
CC4b: Land Mountergate/Prince of Wales Road (NCC.04)	N/A	N/A	N/A	N/A	✓
CC15: Norwich Mail Centre, 13-17 Thorpe Road (NCC.05)	N/A	N/A	N/A	✓	✓
CC16: Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way (NCC.06)	N/A	N/A	N/A	✓	✓
CC11: Land at Argyle Street (NCC.07)	N/A	N/A	N/A	N/A	✓
CC8: King Street Stores, Norwich (NCC.08)	N/A	N/A	N/A	N/A	✓
CC7: Hobrough Lane, King Street, Norwich (NCC.09)	N/A	N/A	N/A	N/A	✓
CC10: Land at Garden Street and Rouen Road (NCC.10)	N/A	N/A	N/A	N/A	✓
CC3: 10 – 14 Ber Street, Norwich (NCC.10)	N/A	N/A	N/A	N/A	✓
GNLP0451: Land adjoining Sentinel House (NCC.12)	N/A	N/A	N/A	N/A	✓
CC24: Land to rear of City Hall (NCC.13)	N/A	N/A	N/A	✓	✓
GNLP0401: Former Eastern Electricity Headquarters, (Duke's Wharf) Duke Street (NCC.14)	N/A	N/A	N/A	N/A	✓

Norwich City Centre	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
GNLP0068: Land adjacent to the River Wensum and the Premier Inn, Duke Street (NCC.15)	N/A	N/A	N/A	N/A	N/A
GNLP2163: Friars Quay Car Park, Colegate (NCC.16)	N/A	N/A	N/A	N/A	✓
GNLP2114: Land at and adjoining St Georges Works, Muspole Street (NCC.17)	N/A	N/A	N/A	N/A	✓
CC30: Westwick Street Car Park (NCC.18)	N/A	N/A	N/A	✓	✓
GNLP3054: Site at St Mary's Works and St Mary's House (NCC.19)	N/A	N/A	N/A	N/A	✓
CC18 (CC19:) Land at 140-154 Oak Street and 70-72 Sussex Street (NCC.20)	N/A	N/A	N/A	✓	✓

Table 5: Impact of Part 2 Sites Plan Norwich Outer North

Norwich Outer North	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
R30: Land at Holt Road (NON.01)	N/A	N/A	N/A	N/A	✓
R29: Two sites at Hurricane Way, Airport Industrial Estate (NON.02)	N/A	N/A	N/A	N/A	✓ x
GNLP0282: Land at Constitution Motors, 140-142 Constitution Hill (NON.03)	N/A	N/A	N/A	N/A	N/A
R19: Land north of Windmill Road (NON.04)	N/A	N/A	N/A	N/A	✓ x
R18: Site of former Start Rite Factory, 28 Mousehold Lane (NON.05)	N/A	N/A	N/A	N/A	✓ x
R17: Site of former Van Dal Shoes (NON.06)	N/A	N/A	N/A	N/A	✓ x
R20: Land east of Starling Road (NON.07)	N/A	N/A	N/A	N/A	✓ x
R31: Heigham Water Treatment Works, Waterworks Road (NON.08)	N/A	N/A	N/A	N/A	✓
R36: Mile Cross Depot (NON.09)	N/A	N/A	N/A	N/A	✓

Table 6: Impact of Part 2 Sites Plan Norwich Outer South

Norwich Outer South	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
R37: The Norwich Community Hospital site, Bowthorpe Road (NOS.01)	✓	N/A	✓	N/A	N/A
R33: Site of former Earl of Leicester Public House, 238 Dereham Road (NOS.02)	N/A	N/A	N/A	N/A	✓
R14/R15: Land at Ketts Hill and east of Bishop Bridge Road (NOS.03)	N/A	N/A	N/A	N/A	✓ x
R13: Site of former Gas Holder at Gas Hill (NOS.04)	N/A	N/A	N/A	N/A	✓ x
GNLP2164: Land west of Eastgate House, Thorpe Road (NOS.05)	N/A	N/A	N/A	N/A	✓ x
R7: John Youngs Limited, 24 City Road (NOS.06)	N/A	N/A	N/A	N/A	✓ x
R1: Land at The Neatmarket, Hall Road (NOS.07)	N/A	N/A	N/A	N/A	✓
R42: Land west of Bluebell Road, and north of Daisy Hill Court/Coral Court, Westfield View (NOS.08)	✓	N/A	N/A	N/A	N/A
GNLP0133-E Land at the UEA: Grounds Depot Site, Bluebell Road University of East Anglia (NOS.09)	N/A	N/A	N/A	N/A	N/A
GNLP0133-DR: Land between Suffolk Walk and Bluebell Road (NOS.10)	N/A	N/A	N/A	N/A	N/A

Norwich Outer South	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
GNLP0133C: Land north of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House, University of East Anglia (NOS.11))	N/A	N/A	N/A	N/A	N/A
GNLP0133BR: Land adjoining the Enterprise Centre at Earlham Hall (NOS.12)	N/A	N/A	N/A	N/A	✓

Table 7: Impact of Part 2 Sites Plan Urban Fringe

Urban Fringe	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Colney COL 2 (GNLP0140C): Land rear/east of Institute of Food Research (IFR) (S.CN.1)	✓	N/A	✓	N/A	✓
Colney COL 3: Redevelopment of existing hospital and science park uses within the Colney Development Boundary (S.CN.2)	✓	N/A	✓	N/A	✓
Colney GNLP0253: Colney Hall, Watton Road (S.CN.3)	✓	N/A	✓	N/A	✓
Colney BAW 2: Bawburgh and Colney Lakes (S.BA.1)	N/A	N/A	N/A	N/A	N/A
Costessey COS 4: Redevelopment of existing uses within the Costessey Longwater Development Boundary (S.CS.1)	N/A	N/A	N/A	N/A	✓
Costessey COS5/GNLP2074: Royal Norfolk Showground (S.CS.2)	N/A	N/A	N/A	N/A	✓
Cringleford KES 2/GNLP0497: Land west of Ipswich Road (S.KE.1)	N/A	N/A	N/A	N/A	✓
Drayton DRA1: Land east of Cator Road and north of Hall Lane (B.DR.1)	N/A	N/A	N/A	N/A	N/A
Hellesdon HEL1: Land at Hospital Grounds, southwest of Drayton Road (B.HD.1)	✓	N/A	N/A	N/A	✓

Urban Fringe	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Hellesdon HEL3/GNLP1020: Land adjacent to existing burial ground (B.HD.2)	N/A	N/A	N/A	N/A	N/A
Rackheath GNLP0172: Land to the west of Green Lane West (B.RA.1)	N/A	N/A	N/A	N/A	N/A
Rackheath GNLP0351: Land at Heathwood Gospel Hall, Green Lane West (B.RA.2)	N/A	N/A	N/A	N/A	N/A
Taverham GNLP0159R: Land off Beech Avenue (B.TA.1)	N/A	N/A	N/A	N/A	N/A
Trowse TROW 1: Land on White Horse Lane and to the rear of Charolais Close & Devon Way (S.TW.1)	✓	N/A	N/A	N/A	N/A

Table 8: Impact of Part 2 Sites Plan Main Towns

Main Towns	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Aylsham GNLP0311, 0595 and 2060: Land south of Burgh Road and west of the A140 (B.AY.1)	✓	N/A	N/A	N/A	N/A
Aylsham GNLP0596R: Land at Norwich Road (B.AY.2)	✓	N/A	N/A	N/A	N/A
Aylsham AYL3: Land at Dunkirk Industrial Estate (west), south of Banningham Road (B.AY.3)	N/A	N/A	N/A	N/A	✓
Aylsham AYL4: Land at Dunkirk Industrial Estate (east), south of Banningham Road (B.AY.4)	N/A	N/A	N/A	N/A	✓
Diss GNLP0102: Land at Frontier Agriculture Ltd, Sandy Lane (S.DI.1)	N/A	N/A	N/A	N/A	✓*
Redenhall with Harleston GNLP2108: Land South of Spirketts Lane (S.HA.1)	N/A	N/A	N/A	N/A	N/A
Redenhall with Harleston GNLP2136: Land at Briar Farm (S.HA.2)	✓	N/A	✓	N/A	✓
Redenhall with Harleston HAR 4: Land at Spirketts Lane (S.HA.3)	N/A	N/A	N/A	N/A	N/A
Redenhall with Harleston HAR 5: Land off Station Hill (S.HA.4)	N/A	N/A	N/A	N/A	✓
Redenhall with Harleston HAR 6: Land north of Spirketts Lane (S.HA.5)	N/A	N/A	N/A	N/A	✓

Main Towns	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Redenhall with Harleston HAR 7: Land south of Spirketts Lane (S.HA.6)	N/A	N/A	N/A	N/A	✓
Hethel GNLP2109: Land South of Hethel Industrial Estate (S.HT.1)	N/A	N/A	N/A	N/A	✓
Hethel HETHEL 1: Restriction of employment uses at Hethel (S.HT.2)	N/A	N/A	N/A	N/A	✓
Wymondham GNLP0354R: Land at Johnson's Farm (S.WY.1)	N/A	N/A	N/A	N/A	N/A
Wymondham GNLP3013 Land North of Tuttlles Lane, Wymondham S.WY.2	N/A	N/A	N/A	N/A	N/A

Table 9: Impact of Part 2 Sites Plan Key Service Centres

Key Service Centres	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Acle GNLP0378R and GNLP2139R: Land west of Acle (B.AC.1)	N/A	N/A	N/A	N/A	N/A
Acle ACL1: Land to the north of Norwich Road (B.AC.2)	N/A	N/A	N/A	N/A	N/A
Acle ACL2: Land south of Acle Station (B.AC.3)	N/A	N/A	N/A	N/A	✓
Acle ACL3: Land at the former station yard, west of B1140 (B.AC.4)	N/A	N/A	N/A	N/A	✓
Blofield GNLP2161: Land adjacent to Norwich Camping & Leisure, off Yarmouth Road (B.BL.1)	N/A	N/A	N/A	N/A	✓ x
Blofield BLO1: Land to the south of A47 and north of Yarmouth Road (B.BL.2)	N/A	N/A	N/A	N/A	✓
Hethersett HET2: Land north of Grove Road (S.HE.1)	ü	N/A	N/A	N/A	N/A
Hethersett HET3: Land west of Poppyfields (S.HE.2)	N/A	N/A	N/A	N/A	N/A
Hingham GNLP0520: Land south of Norwich Road (S.HI.1)	N/A	N/A	N/A	N/A	N/A
Hingham HIN2: Land adjacent to Hingham Industrial Estate at Ironside Way (S.HI.2)	N/A	N/A	N/A	N/A	✓
Loddon with Chedgrave GNLP0312: Land to the east of Beccles Road (S.LO.10)	N/A	N/A	N/A	N/A	N/A

Key Service Centres	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Loddon with Chedgrave LOD3: Land adjacent to Loddon Industrial Estate, Little Money Road (S.LO.2)	N/A	N/A	N/A	N/A	✓
Loddon with Chedgrave: Land off Langley Road (S.CH.1)	N/A	N/A	N/A	N/A	✓
Poringland POR3: Ex MOD site, Pine Loke (S.PO.1)	N/A	N/A	N/A	N/A	✓
Reepham REP1: Land off Broomhill Lane (B.RE.1)	✓	N/A	N/A	N/A	✓
Reepham REP2: Land at former station yard, Station Road (B.RE.2)	✓	N/A	N/A	N/A	✓

Table 10: Impact of Part 2 Sites Plan Broadland Village Clusters

Broadland Village Clusters	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Blofield Heath GNLP1048R: Land east of Woodbastwick Road (B.BH.1)	N/A	N/A	N/A	N/A	N/A
Blofield Heath BLO5: Land to the north of Blofield Corner (B.BH.2)	N/A	N/A	N/A	N/A	N/A
Buxton with Lammas GNLP0297: Land east of Aylsham Road (B.BX.1)	N/A	N/A	N/A	N/A	N/A
Buxton with Lammas BUX1: Land east of Lion Road (B.BX.2)	N/A	N/A	N/A	N/A	N/A
Cawston GNLP0293 and CAW2 (Sites combined to one allocation): Land east of Gayford Road (B.CA.1)	✓	N/A	N/A	N/A	N/A
Cawston CAW1: Land to the west of the existing cemetery (B.CA.2)	✓	N/A	N/A	N/A	N/A
Coltishall GNLP2019 and COL1 (Sites combined to one allocation): Land at Rectory Road and south of the Bure Valley Railway (B.CO.1)	N/A	N/A	N/A	N/A	N/A
Coltishall COL2: Land at Jordans Scrapyard (B.CO.2)	N/A	N/A	N/A	N/A	N/A
Foulsham GNLP0605: Land west of Foundry Close (B.FO.1)	N/A	N/A	N/A	N/A	N/A
Foulsham FOU2: Land at Old Railway Yard, Station Road (B.FO.2)	N/A	N/A	N/A	N/A	✓
Freethorpe GNLP2034: South of Bowlers Close (B.FR.1)	N/A	N/A	N/A	N/A	N/A

Broadland Village Clusters	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Freethorpe FRE1: Land north of Palmer's Lane (B.FR.2)	N/A	N/A	N/A	N/A	N/A
Great Witchingham GNLP0608R: Land at Bridge Farm Field, St Faiths Close (B.GW.1)	N/A	N/A	N/A	N/A	N/A
Horsford GNLP0264: Dog Lane (B.HO.1)	✓	N/A	N/A	N/A	N/A
Horsham and Newton St Faith GNLP0125R: Land to the west of West Lane (B.HS.1)	✓	N/A	N/A	N/A	✓
Horsham and Newton St Faith HNF1: Land east of Manor Road (B.HS.2)	✓	N/A	N/A	N/A	✓
Horsham and Newton St Faith SL2007/GNLP4061/HNF3: Land at Abbey Farm Commercial (B.HS.3)	✓	N/A	N/A	N/A	✓
Lingwood GNLP0380: West of Blofield Road (B.LW.1)	N/A	N/A	N/A	N/A	N/A
Lingwood GNLP4016: East of Station Road, (B.LW.2)	N/A	N/A	N/A	N/A	N/A
Reedham GNLP1001: Land to the east of Station Road (B.RD.1)	N/A	N/A	N/A	N/A	N/A
Salhouse GNLP0188: Land adjoining Norwich Road (B.SL.1)	N/A	N/A	N/A	N/A	N/A
South Walsham GNLP0382/SWA1: Land north of Chamery Hall Lane and land rear of Burlingham Road/St Marys Close, South Walsham	N/A	N/A	N/A	N/A	N/A

Table 11: Impact of Part 2 Sites Plan Gypsy and Traveller Sites

Gypsy and Traveller Sites	Age	Gender	Disability / pregnancy	Race / religion	Socio-economic
Cawston GNLP5004R: Land off Buxton Road, Eastgate (B.CA.GT1)	N/A	N/A	N/A	✓	N/A
Foulsham GNLP5022: The Oaks, Land off Reepham Road (B.FO.GT1)	N/A	N/A	N/A	✓	N/A
Hevingham GNLP5027: Land off Brick Kiln Road (B.HE.GT1)	N/A	N/A	N/A	✓	N/A
Stratton Strawless GNLP5019: Woodland Stable, Shortthorn Road (B.SS.GT1)	N/A	N/A	N/A	✓	N/A
Carleton Rode GNLP5020: Romany Meadow, The Turnpike (S.CR.GT1)	N/A	N/A	N/A	✓	N/A
Carleton Rode GNLP5024: Upgate Street (S.CR.GT2)	N/A	N/A	N/A	✓	N/A
Ketteringham GNLP5013: Ketteringham Depot land east of Station Lane (S.KE.GT1)	N/A	N/A	N/A	✓	N/A
Wymondham GNLP5028 A and B: Land at Strayground Lane (S.WY.GT1A/B)	N/A	N/A	N/A	✓	N/A

Norwich and Urban Area Strategic Sites

42. The Norwich urban area is the most sustainable tier of the settlement hierarchy. One of the benefits of focussing development here is to ensure everyone, including people with a characteristic defined under the equalities legislation, can reach places without the necessity for long journeys that can only be made by the private car. This function of land-use planning especially benefits protected groups such as older people and disabled people who for reasons of reduced mobility may prefer to live closer to services and facilities like healthcare. Reducing the distances to facilities, services, and places of employment also addresses socio-economic disadvantage by cutting the cost of travel.
43. The strategic allocations in the Norwich urban area support the development of urban extensions in a number of locations including Cringleford, Easton and Three Score (Bowthorpe), and are continuing existing North-East Growth Triangle plans for urban extensions in Old Catton, Sprowston, Rackheath and Thorpe St Andrew. This approach to land-use planning benefits everyone by making day-to-day journeys shorter and cheaper, as well as promoting equalities and reducing socio-economic inequalities.
44. Since the 2020 EqIA was written, the Part 2 Sites Plan has undergone changes through the examination process, but the overall affect in benefiting protected groups and addressing socio-economic disadvantage is unchanged. Within the Norwich urban area some sites have been deleted due to unresolved questions about their deliverability, such as CC2 on Ber Street, CC13 on Lower Clarence Road, and GNLP1019/HEL4 in Hellesdon.
45. The overall amount of housing growth in the East Norwich Strategic Regeneration Area to be delivered by 2038 has been reduced from 4,000 homes to 3,000. Nevertheless, the key benefits of the site in terms of providing mixed-use development, improved facilities and services, and potentially specialist housing close to the city centre and public transport facilities remain.

Norwich City Centre

46. The GNLP aims to strengthen the city centre as a place for high density mixed employment, housing, leisure and other uses. The plan will provide new housing in highly sustainable locations and will address socio-economic issues by enabling redundant land to be regenerated.

Norwich Outer North and South

47. There are also redundant pieces of land, many of which were formerly industrial areas, elsewhere in Norwich which the plan allocates for mixed-use residential-led development. Despite the loss or relocation of some employment opportunities, the overall impact of such change is positive because residential-led mixed-use regeneration provides employment opportunities in a changing economy and helps to address housing need.

Urban Fringe

48. The plan for the urban fringe demonstrates the potential for residential and employment growth that complements the strengthening of a thriving city centre. These allocations provide positive impacts including reinforcing Colney as a location for high-tech research and healthcare related investment, the growth of the Longwater retail and employment area, employment-led development along the A140 corridor at Keswick, as well as several smaller housing sites.

Main Towns

49. The main towns are highly sustainable settlements with a good range of facilities and services, playing a significant role in enabling the local economy to thrive. In terms of equalities considerations, there is potential to address socio-economic issues by employment land allocations that assist in creating jobs. Housing allocations provide opportunities to secure developer obligations for land to build schools, to build specialist extra care housing for older people and to provide other facilities.

50. As with the 2020 EqIA, potentially positive impacts arise from the employment land allocations in Aylsham, Harleston, and Wymondham, as well as at Hethel as part of supporting the specialism here for advanced engineering. The residential-led allocations also bring benefits for groups protected under the equalities legislation.

51. An allocation in Aylsham will provide land for a primary school, and there are allocations in both Aylsham and Harleston to build specialist older people's housing. An allocation in Harleston will provide land for a community facility which will benefit groups protected under equalities legislation.

Key Service Centres

52. The KSCs have a good range of facilities and services, as well as employment, and the plan seeks to sustain and improve these places. Some positive impacts will result from site allocations in Key Service Centres (KSCs). These benefits relate to sites that offer employment that could address socio-economic issues, or housing allocations that due to their location present the chance for onsite improvements that could specifically benefit groups protected under equalities legislation.

53. The plan allocates employment land in Acle, Blofield, Hingham, Loddon, Poringland, and Reepham, thereby addressing socio-economic issues; the allocation of an extra care housing scheme in Hethersett will benefit older people; and, in both Hethersett and Reepham there are requirements for school facilities that will particularly benefit young people.

Village Clusters

54. The 2020 EqIA identified positive impacts for equalities issues in the Village Clusters resulting from site allocations. Following the plan's examination, these

findings remain the same because the overall strategic approach is unaltered, despite limited changes to the allocated sites.

55. Examples are employment sites that create new jobs and thus address socio-economic issues, and housing allocations that require onsite improvements that could specifically benefit a group of people designated under equalities legislation. A specific example is the allocation in Cawston for housing, which is near to the primary school, and therefore gives an opportunity to create a new pedestrian crossing that will benefit children by making it safer for them to walk to school.

Gypsy and Traveller Sites

56. The submission draft of the GNLP did not allocate specific Gypsy and Traveller sites. This was identified as a potential negative impact in the 2020 EqIA.
57. The plan now identifies a supply of 62 pitches on 8 site allocations for Gypsies and Travellers in the Sites Plan. Policy 5 of the Strategy will also facilitate sites being brought forward as windfall planning permissions.

Whole Plan Impacts

58. As per the 2020 EqIA, it is important to consider the GNLP holistically and whether collectively the policies adversely affect equalities issues or protected groups. The following section covers the 'Age', 'Gender', 'Race, Religion or Belief' and 'Disability' groups, as well as the more general topic of addressing socio-economic inequalities.

Age

59. The points raised in the 2020 EqIA remain relevant, and the plan continues to make provision for both younger and older people. For children there are criteria in certain site allocations that require land for schools within residential developments, and Policy 5 includes a criterion to promote specialist accommodation for older people on suitable and sustainable sites. Younger and older people alike will benefit from the settlement hierarchy policies which focus housing growth near to services and thereby reduce the need for longer journeys that rely on the private car.

Gender

60. As with the 2020 EqIA, the modified GNLP policies are still considered to have a neutral impact on gender.

Race, Religion or Belief

61. The 2020 EqIA states that the GNLP makes no specific provision for places of worship, and this remains the case. It is still the view that the absence of land being allocated for places of worship is not a significant negative because such

schemes could come forward as planning applications. There is also the possibility that the community buildings and facilities required on some of the larger residential allocations in the plan will benefit minority ethnic and faith groups as well as all other residents.

62. The accommodation needs of ethnic Gypsies and Travellers have been addressed through the GNLP's examination. The matter had already been identified in the EqlA of 2020, and the Partnership acknowledged the need to find specific sites when resolving to submit the GNLP in June 2021.
63. During the examination the Partnership updated its evidence, stating that there is a need for 52 pitches over the remaining plan period from April 2022 to March 2038 that the inspectors examining the plan agreed will be met by a supply of 62 pitches. These modifications now give added confidence that the needs of residents who identify as a Romany Gypsy or Irish Traveller – and who are protected under the Public Sector Equality Duty – will be able to access culturally appropriate residential caravan accommodation.

Disability

64. The GNLP is a land-use plan which includes policies for making places and spaces more accessible for people with a disability, whether that be homes and other buildings, streets and parks, or other public spaces.
65. The plan firstly does this by focusing development on locations with better access to services and facilities. Doing so is better for people wanting to avoid longer journeys and not wanting to be reliant on the private car (which may include reasons to do with disability).
66. Secondly, the GNLP retains the policy requirements for Health Impact Assessments to accompany planning applications for certain types of development and the criterion for housing to be built to adaptable standards in Policy 5 following its examination. The latter will be of particular benefit to people with disabilities.

Socio-economic Inequalities

67. Greater Norwich is generally relatively prosperous, but there are pockets of deprivation where there are difficulties in accessing education and skills training, and with social mobility, unemployment, and inadequate housing. The GNLP creates the opportunity for positive impacts by planning to strengthen the local economy, to provide affordable housing, and to ensure there is access to employment, services, and facilities close to home.

Summary of Impacts

68. A number of modifications have been proposed through the GNLP's examination, but the overall effect of the plan in addressing equalities issues is unchanged, and the findings of the 2020 EqlA remain appropriate.

69. The plan's vision and objectives for promoting sustainable development as required by legislation and the Government's National Planning Policy Framework (NPPF) are largely unchanged.
70. Sustainable development includes co-locating homes with services and jobs which reduces the inequalities suffered by those with limited mobility or who do not have access to a private vehicle for transport. As identified in the 2020 EqlA, the GNLP's settlement hierarchy promotes a healthy mix of shops and services close to home, thereby reducing the need to make lengthy, difficult or costly journeys. Those who benefit most are often those with protected characteristics, such as pregnant women, young parents, people with certain disabilities, the elderly, and this is itself a positive in terms of addressing inequalities.
71. While the strategic policies and site allocations in the GNLP set a direction for creating places that benefit all in society, the plan can only be effective if it is implemented in tandem with other legislation and guidance such as nationally set building regulations and through the plan's promotion of the use of the Building for a Healthy Life standard.
72. The way in which schemes evolve from site allocations in the plan to fully designed schemes that gain planning permission will also impact on equalities issues. As explained in the 2020 EqlA, much of what makes a place effective in reducing inequalities lies in its detailed design, which depends on giving consideration to all sectors of the community. Relevant issues to consider for people with protected characteristics may include: mother and toddler facilities; suitable accesses for those with restricted mobility; clear signage; the width and surface treatment of footpaths for mobility scooters, wheelchairs, and pushchairs; and, ongoing maintenance to remove hazards that may affect visually impaired people like overhanging vegetation.
73. The 2020 EqlA concluded that the detailed design features of a development went beyond the level of detail that a strategic document like the GNLP should specify, and this remains the view now that the plan's examination is close to completion.
74. On this basis, it also remains the case that the GNLP does not need further equalities impact assessment beyond this report.
75. The modifications to the GNLP during its examination have maintained and improved the plan's performance in terms of addressing equalities impacts. The key change is that the potential negative that was identified in the 2020 EqlA has now been addressed by the modifications providing pitches for Gypsies and Travellers. Consequently, the risks of adverse impacts for this legislatively protected group have been addressed.

Monitoring

76. The 2020 EqlA states that *“the effectiveness of a local plan is measured through various indicators collectively referred to as a monitoring framework”*. The monitoring framework has been significantly amended through the plan’s examination.
77. At the submission stage the monitoring framework consisted of 49 indicators split across the 6 objectives of “Communities”, “Economy”, “Environment” “Homes”, “Infrastructure”, and “Delivery”.
78. The monitoring framework will be a separate accompanying document, consisting of 44 indicators for the Part 1 Strategy and 132 indicators for the Part 2 Sites Plan.
79. The revised Monitoring Framework Document not only has more indicators but each one is more thorough. It is also more directly focussed on measurable outcomes related to the plan’s requirements. Alongside a measurable target, there is a trigger point for determining whether the target is being missed and a consequent action is prescribed in all cases.
80. Amongst the indicators are ones relevant to equalities issues and addressing socio-economic disadvantage. Examples of these are indicators to track provisions of specialist older people’s housing, homes built to an accessible standard that could benefit disabled people, and the delivery of residential sites allocated for Gypsies and Travellers.
81. Finally, the revised Monitoring Framework Document improves the likelihood that difficulties or delays in the GNLP’s implementation will be identified early, and that corrective action can be taken because of the increased number of indicators and more thorough approach. This change will positively benefit equalities related issues like reducing socio-economic disadvantages and assessing the delivery of Gypsies and Traveller pitches.

Language

82. Prior to its submission a commitment was made to make the GNLP available in other languages on request and this commitment remains. The GNLP is also written in plain English, and as far as possible technical jargon and acronyms have been avoided. Where technical language is necessary, this is explained in a glossary at the end of the plan.
83. Once adopted the GNLP will be a key document that is used daily by those working for the three councils. It is therefore the responsibility of all staff working in the authorities’ planning departments to ensure that anyone who needs assistance in accessing and understanding GNLP policies gets that support.

Conclusion

84. The conclusion was drawn prior to the submission of the GNLP that it offers a range of ways to address socio-economic inequality and that no further Equalities Impact Assessment is necessary. This conclusion remains appropriate following the plan's examination hearings.
85. The modifications to allocate specific Gypsy and Traveller sites are the most significant changes arising from the plan's examination in relation to the EqIA. These modifications strengthen the plan and mean it can be confidently forecast that culturally appropriate accommodation will be provided for Gypsies and Travellers throughout the plan period.

Glossary

86. Like the original 2020 EqIA ([A10](#)), the following terms are used in this report, and Appendix 2 of the Strategy contains a complete glossary.

GNLP – Greater Norwich Local Plan

Greater Norwich – The collective term for Broadland District Council, Norwich City Council, and South Norfolk Council areas

Protected characteristics – As defined by the Equality Act 2010: Age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

PSED – Public Sector Equality Duty, as defined by the Equality Act 2010 Scoping
The process of deciding how widely to apply the assessment.

Screening – The process of considering the policies against the criteria.

Strategic Policies – Those policies that set out an overall strategy for the pattern, scale and design quality of places.