

St Albans City and District Local Plan 2020-2036

Equalities Impact Assessment

April 2019

Service Area: Planning & Building Control	Section: Spatial Planning & Design	Date assessment commenced: April 2019	
Name of Policy to be assessed:		St Albans City and District Local Plan 2020 - 2036	
1. In what area are there concerns that the policy could have different impact	Race	Disability	Age
	Gender reassignment	Religion or Belief	Sexual Orientation
	Sex	Pregnancy and Maternity	Marriage & Civil Partnership
Other strategic/ equalities considerations	Safeguarding/ Welfare of Children and vulnerable adults	Mental Wellbeing / Community Resilience	
2. Background: Give the background information to the policy and the perceived problems with the policy which are the reason for the Impact Assessment.		The St Albans City and District Local Plan 2020 - 2036 will be the fundamental planning and development framework for St Albans City and District. The Local Plan will have a material effect on the amount and type of housing (including affordable housing); the number and type of jobs; the location and nature of future development; and the protection of open space; across the District, among other aspects. The scope of the Local Plan and the 16 year time span mean that this document will have a significant impact on the lives of those who live and work in or visit the district. Important choices will be made between competing demands and limited resources will be allocated. The Local Plan, paragraph 2.1 sets out a vision to great <i>a district with a thriving community, which is great place to live and work and has a vibrant economy</i> . Objectives to achieve this, as set out in paragraph 2.3 include, but are not restricted to, sufficient homes, workplaces and affordable housing of the types need locally, and infrastructure and community facilities to support and enhance the lives of communities. Policies will however need to be assessed and monitored to ensure no unintended consequences for equality issues occur.	

<p>3. Methodology and Sources of Data:</p> <p>The methods used to collect data and what sources of data.</p>	<p>The policies of the draft Local Plan are based on an evidence base comprised of studies on topics such as housing and employment (e.g. the Strategic Housing Market Assessment and Housing and Economic Land Availability Assessments), transport (e.g. the Local Transport Plan and advice from the County Council as the Highway Authority), site analysis (e.g. the Green Belt Review) and others including conversations with, and the strategic plans of, infrastructure and service providers. The draft Local Plan has also been informed by the separate Sustainability Appraisal of the Local Plan.</p> <p>In addition, the most up-to-date available demographic information was taken from sources such as the Census data 2011, population estimates (Office for National Statistics), 2015 Indices of deprivation (DCLG), and other national, regional, and local sources of data.</p> <p>The process for producing a Local Plan places great weight on the quality of the evidence supporting policy decisions. The evidence base will be tested through public examination by a Planning Inspector before the Local Plan can be adopted.</p>
<p>4. Consultation</p> <p>This section should outline all the consultation that has taken place on EqIA. It should include the following.</p> <ul style="list-style-type: none"> • Why you carried out the consultation. • Details about how you went about it. • A summary of the replies you received from people you consulted. • An assessment of your proposed policy (or policy options) in the light of the responses you received. • A statement of what you plan to do next. 	<p>The Local Plan has been developed with the intention to ensure all sectors of the community have the opportunity to have their say in how their community is planned and developed, irrespective of race; disability; age; religion or belief; gender reassignment; pregnancy and maternity; sex and sexual orientation. Efforts have been made to ensure that the consultation process should be an inclusive one that involves a wide range of community groups, in accordance with the Equalities Act 2010.</p> <p>The draft Local Plan has been informed by the separate Sustainability Appraisal of the Local Plan. This SA framework has been in place since the genesis of the new Local Plan in 2006. Equalities issues have been addressed in a number of ways in the SA throughout the process and most specifically in objective 14 “promote equality and address social exclusion”. There is also the SA Appendix A: Review of Policies, Plans and Programmes: esp 10 Population, Health and Wellbeing. The emerging draft SA has been consulted on at Regulation 18 and Regulation 19 stages alongside the draft Local Plan (details below) and also with previous iterations of draft Plans.</p>

Since 2006 there have been a variety of statutory public consultations on draft Development Plan documents, including the previous draft Strategic Local Plan (withdrawn from Examination in 2017). The current Local Plan preparation process has involved two public consultation exercises. First, a Regulation 18 consultation exercise took place early 2018. This process was carried out in accordance with the Statement of Community Involvement adopted 2015. The consultation was open to anyone to make comments; at the close of the consultation, 21st February, 2,413 responses had been received. The outcomes from consultation (as summarised in the Reg 18 Consultation Statement) helped the District Council to prepare the Publication Draft. At this stage in the Local Plan project the material that was published was focused on introducing the project (the scope and timetable) and on providing background information and asking questions on the themes and trends that the plan will seek to address. In order to make this information accessible and to engage with a wide range of parties/people and levels of interest a range of materials were produced with different audiences in mind, including leaflets, booklets, reports and evidence base documents.

Upon publication of the Draft Local Plan, a second consultation exercise was undertaken in Autumn 2018, under regulation 19. A variety of methods of public engagement were undertaken and aimed to reach a range of groups within the community. This included publicising information through various traditional and social media channels. Organisations that represent equalities groups were contacted and invited to comment at both consultation stages, along with local residents and statutory consultees.

Both consultation stages raised similar concerns from participants. This included general concerns about inequality caused by unaffordability of housing in the district. A number of respondents mentioned the strong need for affordable/social housing for those on lower incomes and support for affordable housing. Also, a significant number of respondents stressed that there is the need for more small / medium family homes, first times buyers and homes for older people being built in the district. Infrastructure provision was a very strong theme.

The draft Local Plan seeks to address these issues (including specifically increasing housing

	delivery, providing more affordable housing, and a range of housing types to meet a range of different population needs) as well as a host of other objectives of the district council to make St Albans a better, healthier, and fairer place to live.		
<p>5. Assessment of Impact</p> <p>Provide details of the assessment of the policy on the nine primary equality strands. There may have been other groups or individuals that you considered. Please also consider whether the policy, strategy or spending decisions could have an impact on safeguarding and / or the welfare of children and vulnerable adults.</p>	Race	Disability	Age
	Neutral	Positive	Positive
	Gender reassignment	Religion or Belief	Sexual Orientation
	Neutral	Neutral	Neutral
	Sex	Pregnancy and Maternity	Marriage & Civil Partnership
	Neutral	Neutral	Neutral
<p>Race:</p> <p>No equalities impact identified.</p> <p>Disability:</p> <p>The thrust and ambition of the draft Local Plan includes the focus of development in locations where a range of services and facilities are relatively accessible by public transport & non-car modes to make developments more accessible to people of all abilities. This development strategy, which sets out Broad Locations to provide sustainable development, is set out in Strategic Policies S1 – S2, with S6 (i – xi) providing more detail to these Broad Locations, and their sustainability.</p> <p>The Local Plan also has specific policies to the provision of housing for Special Needs, in particular those with learning disability (LD), physical disability (PD) and mental health (MH). The requirements include the provisions housing in both C2 and C3 form for at least 60 LD bedspaces, 20 PD bedspaces, and 20 MH bedspaces, including those to be delivered in the Broad Locations.</p>			

	<p>Policy L23 requires 10% of all units within major residential developments to meet Building Regulations requirement M4 (2) 'accessible and adaptable dwellings'. It is considered that this policy will result in some positive effects for housing quality for people with disabilities.</p> <p>Furthermore, L18 focuses on movement and specifically works to support a range of sustainable transport modes; which will provide residents and users of the district with a greater range of movement options and make the city more accessible to people of all abilities.</p> <p>Overall, the effect of the draft Local Plan on the disability equality strand is considered to be positive.</p> <p>Age:</p> <p>The thrust and ambition of the draft Local Plan includes the focus of development in locations where a range of services and facilities are relatively accessible by public transport & non-car modes to make developments more accessible to people of all abilities. The document works to provide better access to community and recreational facilities on site and in adjoining areas</p> <p>Policy L2 Specifically aims to provide housing for older people in both C2 and C3 form. Specifically requiring 500 bedspaces in Nursing Care and similar, and 250 bedspaces in Flexi-Care and similar. Policy L3 further identifies that affordable housing is required for both forms of these accommodation, with planning obligation of 40% of bed spaces or units.</p> <p>L3 also sets out affordable housing provisions at social and affordable rent, and subsidised home ownership, providing affordable housing for younger generations to get enter the housing market.</p> <p>Gender reassignment:</p> <p>No equalities impact identified.</p> <p>Religion or Belief:</p> <p>It is considered that the draft Local Plan will have a neutral effect on people due to their</p>
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	<p>religious beliefs.</p> <p>The main issue is considered to be the likely implications of the draft Local Plan for the completion and provision of religious buildings in the district as well as the protection of existing community facilities that may be used as places of worship.</p> <p>Policy L22 in the Local Plan relates to community, Leisure and Sports facilities within the district. This policy supports the retention of existing community facilities, and development which would lead to the loss of buildings or facilities will not be permitted unless suitable facilities can be provided elsewhere, or their loss can be demonstrated. The policy goes on to recognise the deficit of worship spaces for some existing and growing communities within the district, and the challenges they face finding facilities for religious observation. Opportunities for new provisions will be created as part of development of new Local Centres in Broad Locations, including in joint use community buildings.</p> <p>Beyond that, the Local Plan does not provide any greater benefit for any specific religion or for any beliefs system compared to none, so in this sense it is considered to be neutral.</p> <p>Sexual orientation:</p> <p>No equalities impacts identified.</p> <p>Sex:</p> <p>No equalities impacts identified.</p> <p>Pregnancy and Maternity:</p> <p>No equalities impacts identified.</p> <p>Marriage & Civil Partnership:</p> <p>No equalities impacts identified</p>
<p>6. Consideration of Measures:</p>	<p>The draft Local Plan has been informed by the separate Sustainability Appraisal of the Local</p>

<p>This section should explain in detail all the considerations of alternative approaches/mitigation of adverse impact of the Policy</p>	<p>Plan. The Sustainability Appraisal considers the social, economic, and environmental effects of the Local Plan, and ensures that, as far as possible, it accords with the principles of ‘sustainable development’. A number of the sustainability objectives relate to relevant social issues, such as meeting local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home; improving health and well-being and reducing inequalities in health; reducing poverty and social exclusion; reducing disparities in education, developing opportunities for everyone to acquire the skills needed to find and remain in work; reducing crime and the fear of crime; and creating and sustaining vibrant communities. Where potential adverse impacts were raised and/or identified, policy approaches were changed or adapted, or measures of mitigation were internalised into the final written policy. An example of this can be seen in appendix 1 below, with a full link found to the SA policy assessment</p> <p>https://www.stalbans.gov.uk/Images/CD%20009%20St%20Albans%20Local%20Plan%20Sustainability%20Appraisal%20Report%202018_tcm15-67027.pdf</p> <p>The final policies included in the Proposed Submission Local Plan are present after having due regard, as required by section 149 of the 2010 Equality Act, to the need to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.</p>
<p>6a. Monitoring Arrangements:</p> <p>Outline system which will be put in place to monitor for adverse impact in the future and this should include all relevant timetables. In addition it could include a summary and assessment of your monitoring, making clear whether you found any evidence of discrimination.</p>	<p>A general monitoring framework to check the implementation of the Local Plan is set out in the Submission LP appendix 3. The Council will monitor the implementation and impact of the Local Plan Policies through the Annual Monitoring Report, and the five year review.</p> <p>In addition, on-going community engagement through the implementation of the Local Plan (e.g. through developer engagement at pre-application/application stages) will help to provide a greater understanding of the potential impacts on equalities groups, to inform Masterplanning and application design options and details.</p>
<p>7. Conclusions:</p>	<p>The Local Plan will seek to deliver specific types of development and at specific locations. As such, there is the potential for the policies to have differential impacts on different equalities</p>

	<p>groups. Development at any site could have equality implications for new residents and users/workers within the site, and also communities in adjacent areas. The extent to which control over these potentially different impacts can be exercised varies. Overall, draft Local Plan policies have been designed to attempt to improve the relevant equality strands where possible, and to otherwise have a neutral impact. More specifically, it is not anticipated that there will be a direct impact on equality issues related to gender reassignment, sex, sexual orientation, pregnancy and maternity, or religion and beliefs as a result of the policies and development proposed in the Local Plan; whilst it is considered that the policies and resulting development patterns of the Local Plan are likely to have some positive effect on the age and disability equality strands.</p>
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Appendix 1: Homes, Affordable Homes, and Workplaces

Option	SA Objectives																			
	1. Biodiversity	2. Water resources	3. Flood risk	4. Soils	5. GHG Emissions	6. Climate Change Proof	7. Air Quality	8. Previously developed land	9. Resource Efficiency	10. Historic environment	11. Landscape/ Townscape	12. Health	13. Sustainable Locations	14. Equality/ Social Inclusion	15. Good Quality Housing	16. Community Identity	17. Crime and Fear of Crime	18. Sustainable Prosperity and Growth	19. Fairer Access to Services	20. Revitalise Town Centres
Policy L1 Housing Size, Type, Mix and Density	✓	-	-	✓	✓	-	-	-	✓	✓	✓	-	✓	✓	✓	✓	-	-	-	✓
Policy L2 Older Persons Housing and Special Needs Housing	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	-	-	-	-	-
Policy L3 Provision of and Contributions towards Affordable Housing	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	✓	-	-	-	-
Policies L4, L5 and L6 – Green Belt developments	-	-	-	✓	-	-	-	✓	-	✓	?	-	✓	-	✓	✓	-	-	-	-
Policy L7 Gypsies, Travellers and Travelling Show People	?	-	-	-	-	-	-	-	-	?	?	-	✓	✓	✓	✓	-	-	-	-
Policy L8 Primarily Residential Areas	-	-	-	-	-	-	-	-	-	-	-	✓	-	✓	✓	-	-	-	-	-
Policy L9 Primarily Business Use Areas and Policy L10 Strategic Office Locations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-
Policy 11 - BRE, Bricket Wood	?	-	-	-	x ✓	-	x ✓	✓	✓	-	-	✓	x	✓	-	✓	-	✓	✓	-
Policy 11 - Rothamsted Research, Harpenden	x	-	-	x	✓	-	✓	✓	-	?	✓	✓	✓	-	-	-	-	✓	✓	✓