

Draft Herefordshire Local Plan Equality Impact Assessment (EIA)

1. Prepared by the Strategic & Neighbourhood Planning Team, Economy and Environment Directorate

2. What is being assessed

The Draft Regulation 18 Herefordshire Local Plan 2021 - 2041

Herefordshire Council is required by the Government to have an up to date Local Plan which sets out a sustainable pattern of development that meets the county's need for housing and other land uses. The current Core Strategy was adopted in 2015. Government guidance, as set out in the National Planning Policy Framework (NPPF), advises that Local Authorities should review their Local Plan documents every five years to see if they need updating. Herefordshire Council has done this and decided in November 2020 that an update of the Local Plan was required.

3. What is the aim, purpose and/or intended outcomes of this activity?

The purpose of the Herefordshire Local Plan is to set out the planning strategy and priorities for land use in the county, shaping the development of the county up to 2041. The Draft Local Plan once adopted will replace the [Herefordshire Core Strategy 2015](#) and it will be the main Development Planning Document for the county, containing the policies by which planning applications will be determined and providing the framework for Neighbourhood Plans prepared by the Parish Councils. The Draft Local Plan includes the following:

- A vision for Herefordshire at 2041;
- A set of objectives to deliver that vision;
- A strategy which explains the approach to all development in the county;
- Strategic policies that set out requirements for how development must be delivered across the whole county;

- Place shaping policies which are specific to development for Hereford, for the market towns and in the rural areas and identify sites for development.

The vision for the Draft Plan is made up of the following and encompasses three key areas:

Environment - Herefordshire will be carbon neutral, and nature rich. The county's distinctive landscapes, cultural heritage and natural environment will be protected and enhanced for the benefit of people and wildlife. The county's residents' quality of life will be enhanced by ensuring they are able to live in more environmentally sustainable ways.

Community - The County will have resilient, well connected communities where new development is beautifully designed and inclusive. The health and wellbeing of the county's residents will be enhanced by everyone having the opportunity to live in a decent home with access to community facilities and services.

Economy - Herefordshire will be prosperous, with a diverse and sustainable economy. The county's farming heritage and sustainable tourism sectors will continue to play an important role in the rural economy. Hereford and the market towns will be thriving centres and popular places to live, work, and visit. Hereford will be recognised as a centre for education as well as a place where innovative businesses can invest and thrive.

The following objectives have been proposed to facilitate the delivery of the vision for the Draft Local Plan for each of the three key themes and provide the framework for more detailed planning policies:

Environment

- 1 To ensure that development requires significantly less energy use and to increase the amount of energy generated from renewable sources, with a requirement for all new developments to be carbon neutral.
- 2 To protect communities from the worst impacts and dangers of climate change, including from flooding and heat stress.
- 3 To significantly improve water quality and ensure that all watercourses in the county are classified as 'good' quality'.
- 4 To protect the Wye Valley and Malvern Hills National Landscapes whilst, at the same time, valuing the county's whole ecology and landscape.
- 5 To maximise biodiversity, enhance and extend Herefordshire's natural capital, green and blue infrastructure and nature recovery networks while significantly increasing tree cover in Hereford and the market towns.
- 6 To ensure high quality and sustainable design of buildings and spaces taking into account local character and protecting local heritage assets and their settings.
- 7 To create a sense of place and local distinctiveness.
- 8 To minimise and carefully manage the use of natural resources, including minerals, land, and water and to encourage the reduction, reuse and recycling of waste, to achieve a circular economy.
- 9 To significantly improve air quality.

Community

- 10 To provide inclusive connectivity, development and infrastructure for all
- 11 To ensure that all new development supports the health and wellbeing of its occupants in accordance with the Healthy Home Principles.
- 12 To ensure that all residents are well connected to nearby services and facilities for daily requirements.
- 13 To create good quality, attractive places to live and work
- 14 To support good health and wellbeing, through easy access to open space, sports facilities, and active travel options.
- 15 To ensure the provision of high-quality education easily accessible for all and increase skills and qualifications.
- 16 To ensure residents feel safe in Herefordshire from crime and climate change events.
- 17 To enhance access to cultural heritage and heritage tourism.

Economy

- 18 To support and encourage sustainable economic growth in the county.
- 19 To strengthen the role of Hereford City as the central hub of the county where people have easy and equitable access to good quality business, leisure, cultural, retail and employment opportunities.
- 20 To support the increased vitality and viability of the Market Towns including renewal of the county's high streets and town centres.
- 21 To support a strong rural economy including appropriate farm diversification and modernisation to strengthen the agricultural sector and its role in the rural economy.
- 22 To ensure that all new development is accompanied by fast and reliable digital connectivity.
- 23 To support the transition to a carbon neutral and circular economy, and the creation of 'green' jobs.
- 24 Through employment land provision, facilitate well paid skilled jobs, which retain and attract working age people to live in the county.
- 25 To support the small business sector, help independent businesses to thrive, and encourage the creation of local business identities.
- 26 To encourage and support responsible tourism that contributes to the county's economic diversity, whilst respecting its historic and natural character.
- 27 To strengthen the hospitality sector and to promote a diverse night time economy which offers a safe and enjoyable experience for all.

4) Who will be affected by the development and implementation of this activity?

- All residents and communities
- Landowners
- Businesses

- Development industry
- Service providers
- Visitors

Other:

Is this:

- Review of an existing activity/policy
- New activity/policy
- Planning to withdraw or reduce a service, activity or presence?

5) What information and evidence have you reviewed to help inform this assessment? (Name your sources, e.g. demographic information for services/staff groups affected, complaints etc.)

A number of information resources have been used to both inform this assessment and the local plan including:

- Local Plan [Evidence base](#) which covers a number of different topics such as the Herefordshire Housing Market Needs Assessment 2021, Gypsy and Traveller Accommodation Assessment 2022, Open Space Assessments.
- [Census data](#), [Joint Strategic Needs Assessment](#) and Herefordshire Council's [Equality Policy](#).
- [Feedback and demographic profiling from 2022 Draft Local Plan Consultations](#) The information gathered indicated that:
- - The majority of respondents were aged between 55-64 and 65-74, reflecting Herefordshire's demographics, where these age groups constitute a larger portion of the population according to the 2021 Census.
 - The majority of respondents are of White (English/Welsh/Scottish) ethnicity, also reflecting the demographics of Herefordshire in line with Census 2021.
 - The majority of respondents did not consider themselves to have a disability.
 - There were slightly more men than women who responded although a number of respondents preferred not to specify.

6) Summary of engagement or consultation undertaken (e.g. who and how have you engaged with, or why do you believe this is not required)
Early 2022 Consultation (Pre-regulation 18)

As part of the Local Plan preparation process a non-statutory early consultation was held between January and July 2022. The purpose of this consultation was to provide an opportunity to all residents and stakeholders to discuss existing and emerging issues and different options and approaches in addressing these challenges including identify ways of distributing and managing development and growth in the county over the plan period up to 2041. The early consultations consisted of the following;

- Spatial Options consultation – covering the distribution of housing around the county. This first round of consultation presented different spatial options for distributing housing growth.
- Policy Options consultation – The second stage of consultation covered policy options and sought views on key policies covering a number of themes, including climate change, housing, employment and transport.
- Place Shaping Consultation – This round of consultations sought views on the strategic growth areas in Hereford, the market town and rural areas including a new rural settlement hierarchy.

The 2022 consultations were conducted in accordance with the [Statement of Community Involvement 2022](#), which sets out who will be consulted, how they will be consulted and how those at risk of exclusion will be involved in the plan making process. In addition, a number of additional engagements and follow-up events were held following the end of the early consultation stages and these were set up to address the concerns raised by communities through their parish and county councillors.

Effort was made in the 2022 consultation to make the consultations as inclusive as possible. The 2022 consultations were promoted via social media, notice boards in community halls and libraries, and email for registered individuals. Formal letters were sent by post to those who registered their interest but are without online access. Parish and Town Councillors assisted in expanding outreach and connecting with local communities. A variety of methods of public engagement were undertaken and aimed to reach residents, in-person events across the county, online questionnaire via CommonPlace, an online consultation platform provides accessible materials to support those with visual / hearing impairments and paper versions in libraries.

Although attempts were made to engage with the broadest cross section of the public, following our analysis and profiling of the responses we found that most respondents were aged 55 to 74 and were concentrated in Hereford and Ross-on-Wye, 5% of respondents were from non-white British background and 16% considered themselves disabled. This has been taken into account when devising the strategy for the Regulation 18 consultation with the aim of broadening participation in the consultation process. The majority of respondents do not consider themselves to have a disability. Slightly more men than women responded with a small number preferring not to specify.

Regulation 18 consultation

The Draft Local Plan is the subject of public consultation between 25 March and 20 May 2024. The minimum requirement for such consultations is 6 weeks but this has been extended to 8 weeks to increase our outreach and engagement with stakeholders and the general public. A number of consultation roadshow events have taken place at different venues across the county and at different times of day including weekends. This was to enable people who are unable to attend daytime events (e.g. people of working age and those in full-time education), to attend evening in-person sessions across the county.

The online Commonplace platform, which is a citizen engagement plan, is live throughout the eight weeks for people to provide feedback at their convenience.

In response to trying to encourage engagement with younger people, we have collaborated with Hereford Sixth Form College and held an in person event at the college providing an opportunity for students to find out more about the local plan. We have also contacted all secondary schools in the county to make them aware of the consultation. A specific youth survey to gather the perspectives of young people in Herefordshire has also been prepared. Copies of the Draft Local Plan are available on request in different languages.

We continue to collect data about the diversity profile of respondents and use this information to inform future public consultations.

7) Summary of relevant findings

The relevant findings which have informed the development of the Local Plan have been drawn from [the early 2022 consultations](#), [evidence base, Sustainability Appraisal/ Habitat Regulations Assessment \(SA/HRA\)](#) and [Annual Monitoring Reports \(AMR\)](#).

8) The impact of this activity

Please consider the potential impact of this activity (during development and implementation) on each of the equality groups outlined below. **Please tick one or more impact box below for each Equality Group and explain your rationale.** Please note it is possible for the potential impact to be both positive and negative within the same equality group and this should be recorded. Remember to consider the impact on staff, public, patients, carers, partner organisations, etc. in these equality groups.

Potential <u>positive</u> impact	Potential <u>neutral</u> impact	Potential <u>negative</u> impact
+	±	—

Equality Group	Tackling climate change	Protecting and enhancing the natural, built and historic environment	Accommodating future growth	Creating balanced communities	Creating healthy and sustainable communities	Promoting a prosperous economy	Place Shaping for Market Towns and Rural Areas
Age	+	+	+	+	+	+	+
Disability	+	+	+	+	+	±	+
Gender Reassignment	±	±	±	±	+	±	±
Marriage & Civil Partnerships	±	±	±	+	+	±	±
Pregnancy & Maternity	+	+	+	+	+	±	+
Race (including Travelling Communities and people of other nationalities)	+	±	—	—	+	±	—
Religion & Belief	+	±	±	±	+	±	±
Sex (including issues of safety and sexual violence)	+	+	+	+	+	±	+
Sexual Orientation	+	±	±	±	+	±	±
Health Inequalities (any preventable, unfair & unjust differences in health)	+	±	+	+	+	+	+

<p>status between groups, populations or individuals that arise from the unequal distribution of social, environmental & economic conditions within societies)</p>							
<p>Other Vulnerable and Disadvantaged Groups (e.g. carers, care leavers, homeless, social/economic deprivation, etc.)</p> <p>Rural Isolation and Poverty</p>	+	+	+	+	+	+	+

Potential positive impact

Tackling Climate Change

Policies CC1 (carbon neutral Herefordshire) promotes sustainable modes of transport seeking developers to contribute to facilitating safe and easy as possible walking, wheeling and cycling to essential facilities and services and nearby public transport. It is anticipated that this policy will help increase accessibility and so benefit less mobile groups including older residents, disabled people, younger people and those in rural isolation and poverty.

Protecting and Enhancing the Natural, Built and Historic Environment: A high quality Herefordshire

Policy EE3 (Protecting and enhancing the quality of the natural environment) sets out the requirements for well-designed, safe and sustainable neighbourhoods. The policy contains criteria setting parameters for development to ensure proposals include high quality, resilient and safe buildings and incorporating natural surveillance to improve safety in communities. Increasing safety in communities through design will have positive impacts on women, children and the elderly.

In addition, this policy aims to improve accessibility requiring proposals to be designed in a way which encourages walking, wheeling and cycling providing ease of access for all, through connected footpaths and cycle routes. This policy will also help increase accessibility and so benefit less mobile groups including older residents, disabled groups, younger groups and those in rural isolation and poverty.

Accommodating Future Growth

Policies AG1 – AG4 set out how much and where housing will be built across the county up to 2041. These policies require new housing development to take place in the most sustainable locations in the county, thereby helping to improve and/or retain local services and increasing the opportunities for communities to access jobs, key services and facilities and local amenities within a short walking, wheeling or cycling distance or by public transport. These policies should positively impact all groups. Specifically, it will improve accessibility for those living with disabilities, the elderly and those in rural isolation and poverty to access facilities and services, jobs and local amenities.

Creating Balanced Communities

To foster inclusive communities Policy BC1 sets out standards for all housing development to comply with the nationally described space standards including Building Regulations 2010 Optional requirement M4 (2) Category 2 (accessible and adaptable homes). It also requires that 5% of all new homes meet M4 (3) Category 3 (wheelchair user dwellings). Furthermore the policy also requires development to adhere to the Healthy Homes Principles. This policy seeks to accommodate the particular housing needs of disabled and older people to improve access to safer homes, and so delivering these standards through Policy BC1 is anticipated to have a positive impact on these protected characteristics.

Policy BC2 on affordable housing, outlines the target amount for affordable housing in areas across Herefordshire and the thresholds for when the policy applies to open market housing. This policy is aiming to address different housing needs across the county. It requires open market housing proposals to provide a proportion of affordable housing on sites of 10 dwellings or more (a nationally set target). The policy seeks to ensure inclusivity and better access to housing for various groups, including low-income individuals, young first time buyers and families. In addition, to increase access to affordable housing in rural areas, where the affordability is more acute than in urban areas, this policy also seeks to secure affordable housing contributions on smaller sites (5 dwellings or more) subject to the county becoming a Designated Rural Area under the Housing Act 1985. Confirmation from the Secretary of State is awaited following our application for the status. This will improve access to affordable housing for those living in rural isolation and poverty.

Policy BC3 focuses on promoting diversity in housing delivery methods to accommodate various housing needs and income levels in the county. By requiring a minimum of 5% of dwellings on sites of 20 or more to be dedicated to serviced (ie those that have access to utilities) plots for self or custom build housing, it encourages individual choice. This provision may benefit groups such as young families, first-time homebuyers, and disabled people seeking personalised housing solutions to meet their individual needs.

Creating Healthy and Sustainable Communities

Policy HSC1 has the potential to promote health and well-being for all residents, including protected characteristic groups. Providing new community and health facilities tailored to the needs of the local population can benefit all residents, but particularly those with protected characteristics, by improving access to essential services and promoting social inclusion. Protecting existing facilities prevents the loss of vital resources for the community, which may disproportionately affect all those in these groups who rely on these services. Additionally, promoting better physical and mental well-being and improving access to open spaces benefits all demographics with protected characteristics, improving their health outcomes. Policy HSC1 also emphasises creating healthy food environments by providing opportunities for community food growing through the retention and provision of allotments, community orchards, and local markets. These measures contribute to fostering equitable access to healthy food sources which may have otherwise been difficult to access for some groups including those living in rural poverty or isolation.

Promoting a Prosperous Economy

Policy PE2 aims to strengthen and diversify the economy of the county through several measures by providing suitable sites for new employment, safeguarding existing strategic employment sites and also encouraging economic development in association with local educational institutions. This has the potential to improve access to employment and can create opportunities for skills development and training for those of younger ages and those living in rural poverty and isolation.

Policy PE4 aims to promote sustainable tourism that benefits both visitors and local communities while protecting the natural and historic environment. Tourism development can stimulate economic growth and create job opportunities. However tourism growth could produce externalities which specifically impact those in the protected characteristic groups negatively. This policy therefore seeks to deliver sustainable tourism by maximising job creation whilst safeguarding against the impact on housing availability, services and facilities and the natural and historic environment. Overall, policies within the Promoting a Prosperous Economy section aim to ensure the sustainable growth of the local economy, whilst also diversifying the largely agricultural industry, expanding employment and skills training opportunities for all residents and has a targeted benefit for younger groups in education and those living in rural poverty and isolation.

Place Shaping for the Market Towns and Rural Areas

The Place Shaping section identifies specific sites across the county where large-scale housing and employment development will take place. Its aim is to promote sustainable, inclusive and prosperous communities, in line with the vision and objectives of the Draft Local Plan. The policies have been drafted following responses from the outreach to communities, and reflect their particular needs. Many of the policies within the Plan will benefit the entire community in Herefordshire. Nevertheless, some policies will have the potential for some direct or indirect equality impact certain people with certain protected characteristics, and/or those in other vulnerable and disadvantaged groups such as people living in rural isolation and poverty. For example:

Potential neutral impact

All policies in the Draft Herefordshire Local Plan are intended to positively impact all residents of Herefordshire regardless of their protected characteristics, or vulnerabilities. However, it is not anticipated that the Draft Local Plan will give rise to any particular positive impacts specifically in respect of the following groups; Gender Reassignment, Marriage & Civil Partnerships, Religion & Belief, Sexual Orientation and so it is expected to have a neutral impact on the aforementioned protected characteristics.

Potential negative impact

Policy AG6 encourages proposals for new pitches to meet the demand for Gypsy, Traveller and Travelling Show People and safeguards existing sites from development. At present, we have not allocated new sites to meet the future demands of this community. We are taking active measures in investigating new sites to meet this demand and in the interim we encourage new suitable sites to come forward through the development management processes.

What actions will you take to mitigate any potential negative impacts?

Potential negative impact	Actions required to reduce/eliminate negative impact	Who will lead on action?	Timeframe
Suitable housing site for Gypsy and Traveller	Further call for sites and co-operate with neighbouring authorities to find adequate land to meet housing needs of the Gypsy and Traveller community.	Strategic Planning Team working with Gypsy and Traveller Team	Ongoing

Where an impact on any of the Equality Groups is realised after the implementation of the project/service/policy, the commissioners and/or providers of the project/service/policy will seek to minimise the impact and carry out a full review of this EIA.

9) Monitoring and review

How will you monitor these actions?

We will continue to monitor the profile of the respondents and use this data to inform future consultations. The Draft Local Plan is also supported by numerous monitoring reports, some of which are updated annually. In addition, the Draft Local Plan, once adopted, will be subject to a statutory requirement to be reviewed every five years.

When will you review this EIA? (E.g. in a service redesign, this EIA should be revisited regularly throughout the design & implementation)

The EIA will be reviewed at each future stage of the Local Plan process.

10) Equality Statement

- All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on the 9 protected characteristics.
- Herefordshire Council will challenge discrimination, promote equality, respect human rights, and design and implement services, policies and measures that meet the diverse needs of our service, and population, ensuring that none are placed at a disadvantage over others.
- All staff are expected to deliver services and provide services and care in a manner which respects the individuality of service users and as such treat them and members of the workforce respectfully, paying due regard to the 9 protected characteristics.