

Greater Norwich Local Plan

Equality Impact Assessment

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

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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 are protected characteristics under the Equality Act 2010:

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

Furthermore, the Equality Act 2010 also requires local authorities to consider reducing the inequalities of outcome which result from socio-economic disadvantage.

The 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 Greater Norwich Local Plan (GNLP) have any impact (positive or negative) on any protected group, and to consider whether the GNLP policies address socio-economic inequality.

Methodology

The Equalities Impact Assessment has been undertaken by officers in the core policy team producing the GNLP. Therefore equalities issues have been embedded into the plan making process. External organisations were not invited to take part. However, the local plan process has invited involvement from a range of organisations representing the residents of Greater Norwich. These include groups representing people with protected characteristics.

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 (2011). Despite its age, the Census is recognised as being an accurate and nationally consistent data source.

A scoping exercise was completed in the preliminary stages of completing this assessment. This 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 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 justification for screening together some groups was that anyone with a health issue (whether temporary or ongoing, affecting mobility, vision, mental wellbeing etc) would have a need for accessibility to services, in particular health services. A collective commonality was also considered to apply to people whose lifestyle choices, belief systems or religion may result in a need for access to community facilities etc. This was the reason for grouping together the needs of people who may otherwise have little in common.

The same screening exercise was applied to consider whether policies would address socio-economic disadvantage. Pockets of socio-economic inequality exist throughout the area. Therefore, for these purposes, non-specialist 'local' employment was considered to potentially benefit local residents.

The consideration of the impact of evolving policies on equalities issues was an iterative process, with progress on the EqIA report running in parallel to the development of the draft policies. The tables in the report identify any protected groups or socio-economic inequalities which may be impacted (either positively or negatively) by each policy in turn. If a policy would have no impact on a particular aspect, the result is recorded as 'not applicable'.

Where the screening exercise identifies that any GNLP policy has an impact upon one or more group, or on socio-economic disadvantage, 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, or on socio-economic inequality, the report proposes a method of monitoring the impact.

Greater Norwich Context

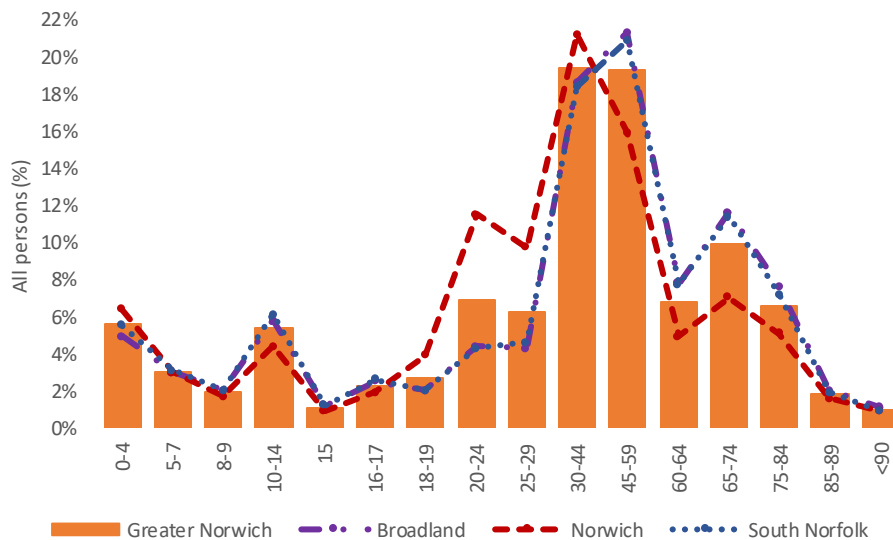
The information in this section provides a context for the consideration of GNLDP policies. It gives an overview of social diversity in Greater Norwich and identifies as many of the different protected groups as possible.

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.

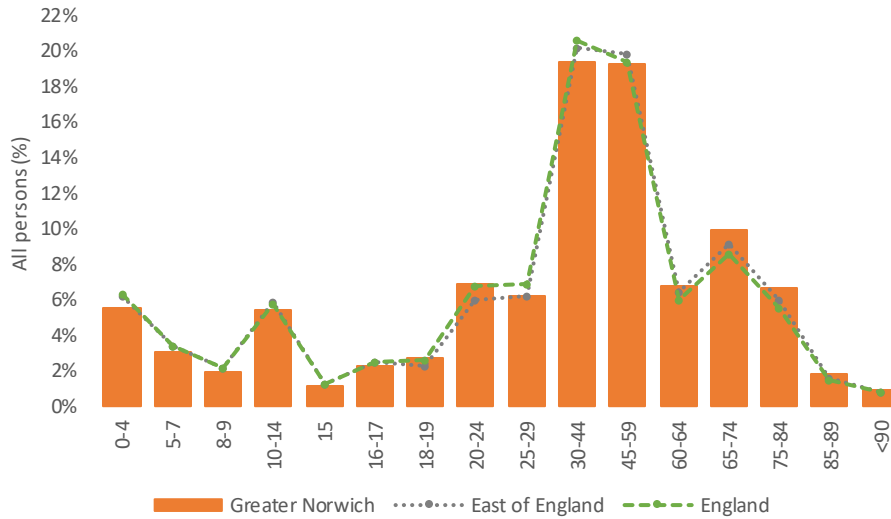
Graph 1: Age Group Comparison (Greater Norwich, Broadland, Norwich, South Norfolk)

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.

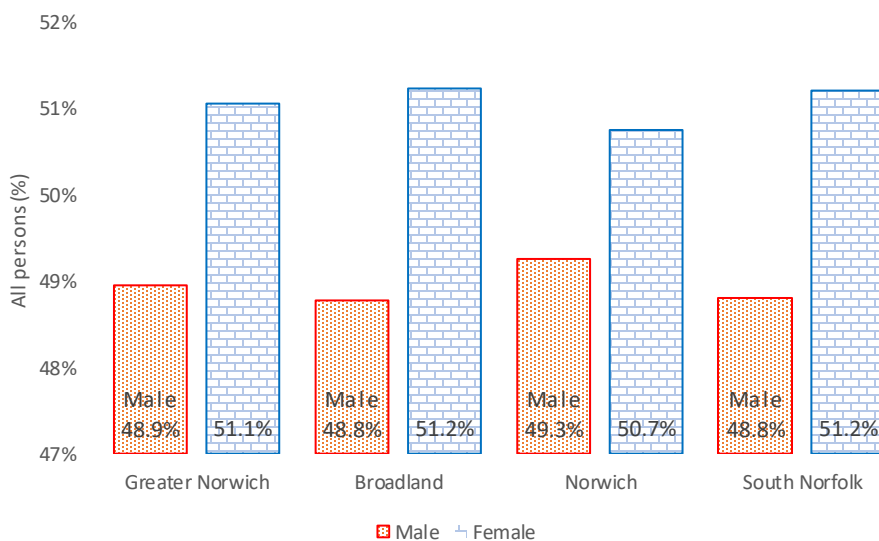
Graph 2: Age Group Comparison (Greater Norwich, East of England, England)
 Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 26 June 2019]



Gender

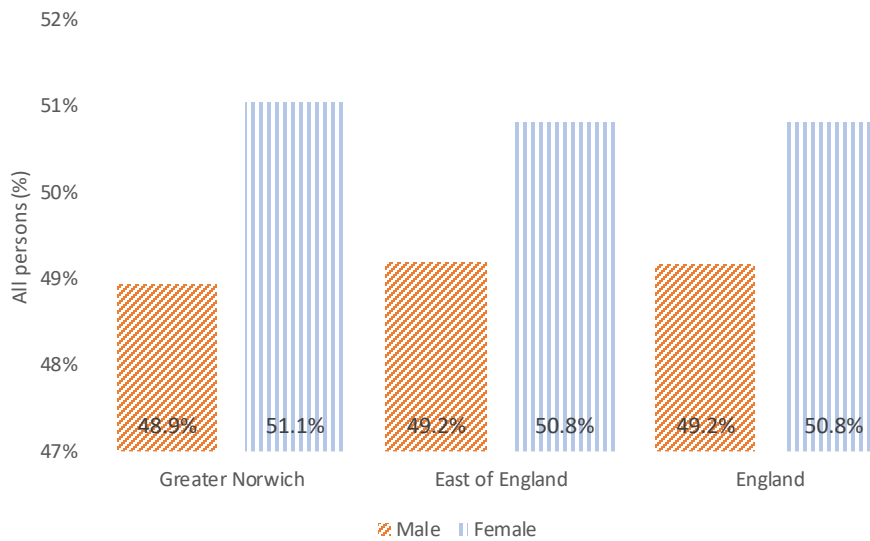
The population of the Greater Norwich area in the 2011 Census was 381,170. There are slightly more women than men in all districts, although this is slightly less pronounced in Norwich.

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



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)



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)

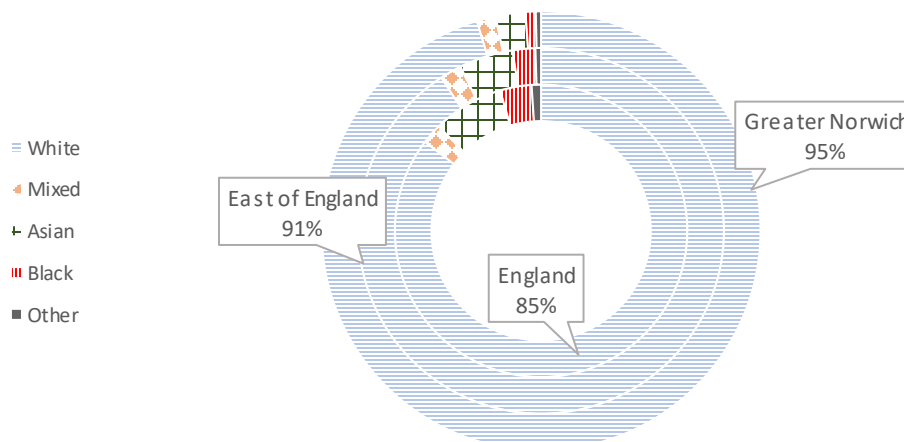


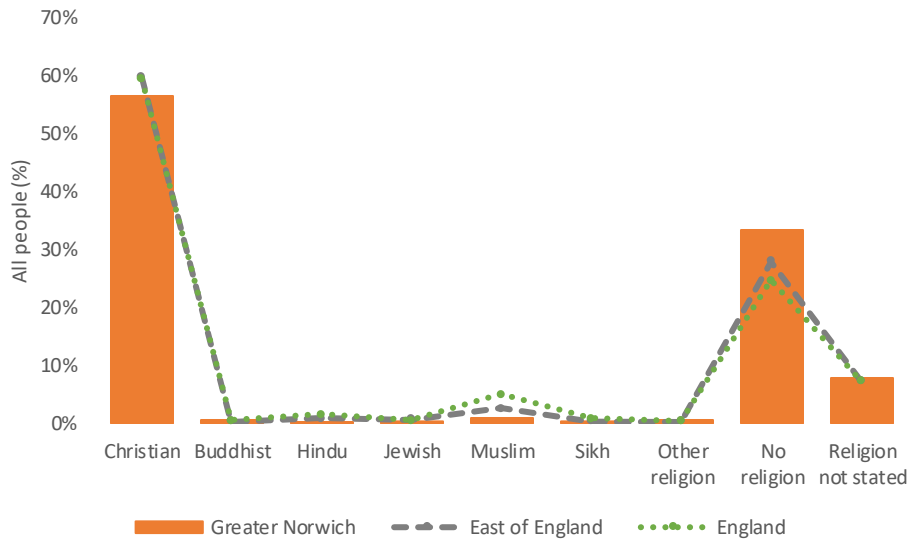
Table 1: Population by Specific Ethnic Origin (Greater Norwich, East of England, England)

Ethnic Group	Greater Norwich	East of England	England
White	95.3%	90.8%	85.4%
White: English/Welsh/Scottish/Northern Irish/British	96.3	93.9%	93.4%
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.

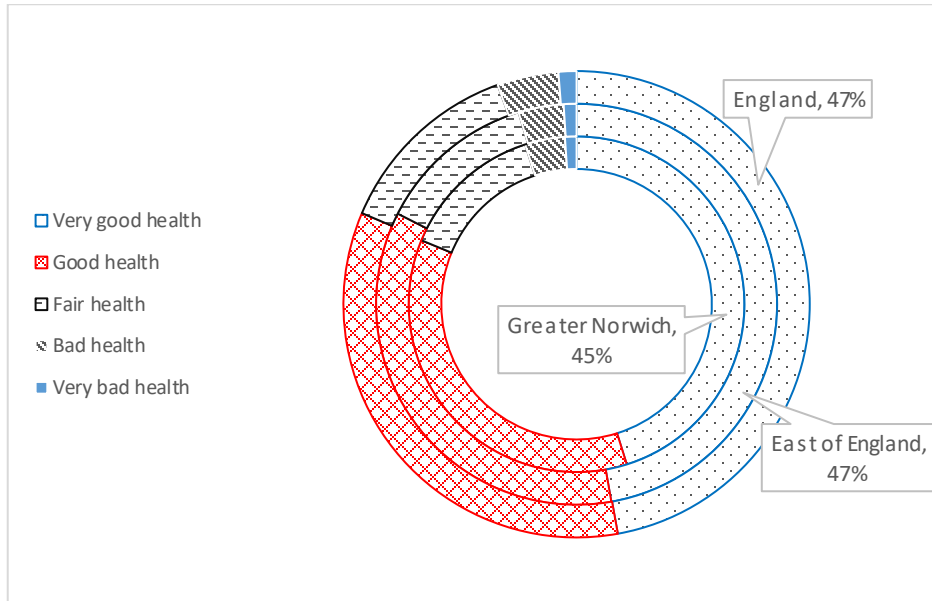
Graph 6: Religious Identity (Greater Norwich, East of England, England)
 Source: 2011 Census ONS Crown Copyright Reserved from Nomis on 26 June



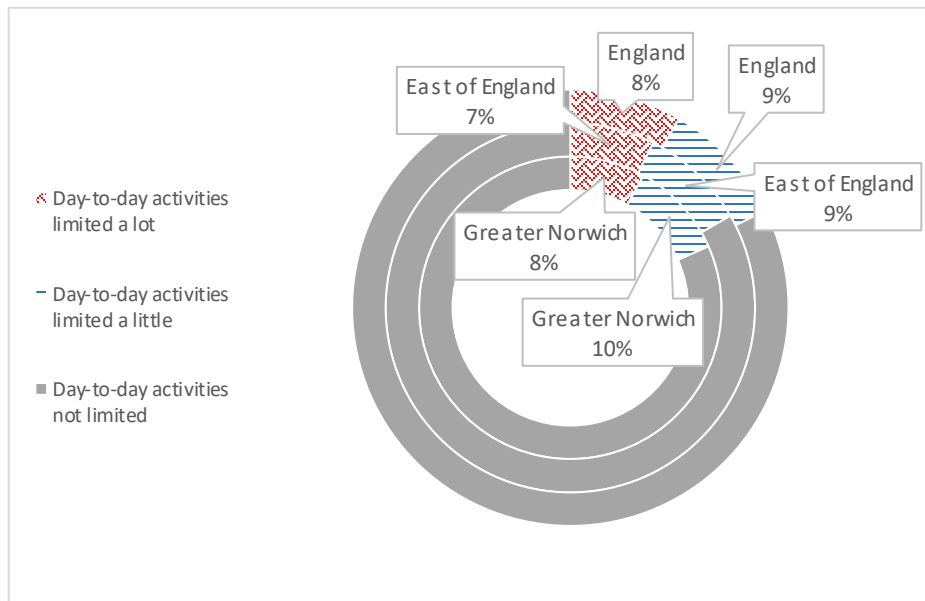
Health & Disability

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



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



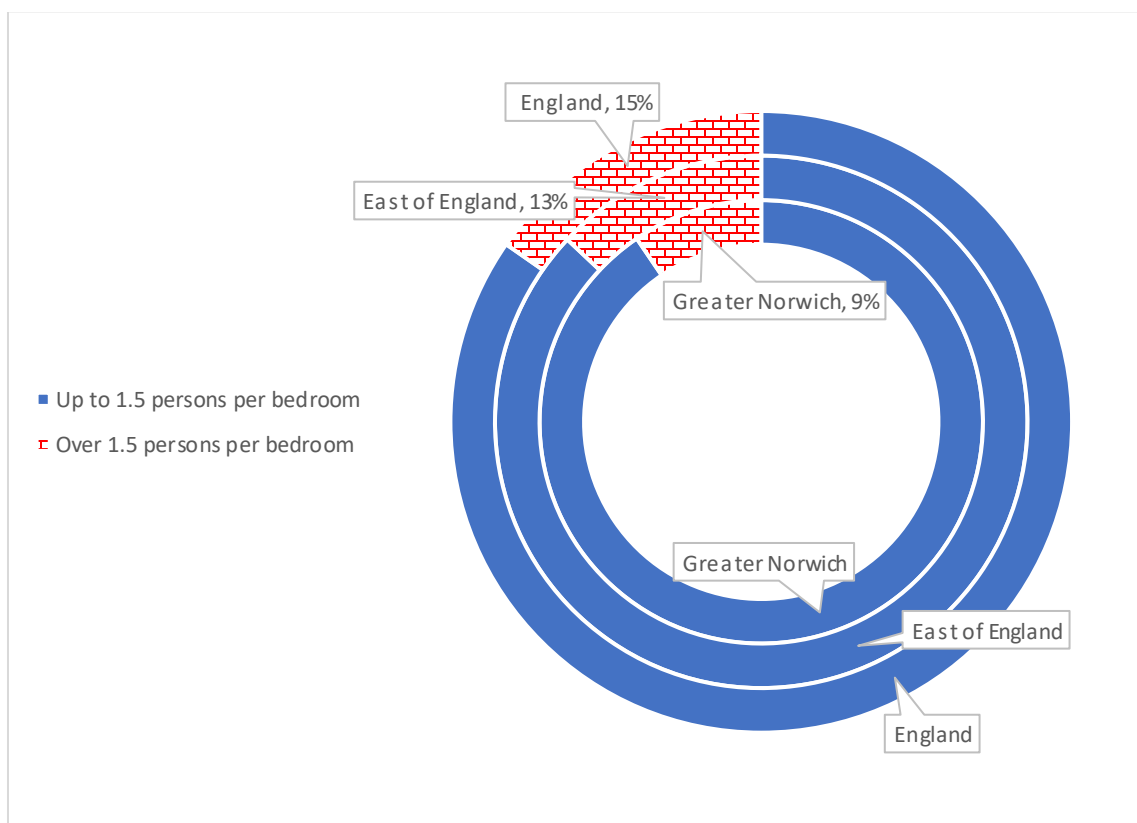
Socio-economic Disadvantage

There are localised areas with high levels of deprivation across Greater Norwich. According to the Index of Multiple Deprivation 2019, Norwich ranks as 52nd in England based on the average score. Norwich has slightly lower than the national average percentage of people educated to NVQ4 level¹ (first year of degree level). It also has above the national average level of 16-17-year olds not in education, employment or training (NEET)² at 9.2%. Norwich performs particularly poorly for social mobility³ with an overall ranking of 294th out of 324 local authority areas in 2017.

The Census asked about the number of people in a household compared with the number of bedrooms. The graph below shows that 9% of people in Greater Norwich live in households with over 1.5 persons per bedroom. In this respect Greater Norwich performs better than the regional or national level.

Graph 9: Percentage of people with more than 1.5 persons per bedroom (Greater Norwich, East of England, England)

Source: 2011 Census ONS Crown Copyright Reserved [from Nomis on 15



¹ Source: [Nomis](#) Norwich has 38.5% of its population educated to NVQ4 level and above, Broadland 39.7% and South Norfolk 36.9%. The Great Britain figure is 39.3%.

² Source: [Government NEET statistics](#)

³ Source: [Social Mobility and Child Poverty Commission, Jan 2016](#)

Policy Assessment

The following table illustrates the screening process for all policies in the Regulation 19 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	Socio- econom ic
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 Small Scale Windfall Housing Development	N/A	N/A	N/A	N/A	N/A
7.6 Preparing for New Settlements	N/A	N/A	N/A	N/A	N/A
Site specific policies - Norwich	Age	Gender	Disability	Race/ religion	Socio- econom ic
East Norwich Strategic Regeneration Area sites GNLP0360, GNLP3053, R10	✓	N/A	N/A	N/A	✓
Norwich sites GNLP0068, GNLP0133-B, GNLP0133-C, GNLP0133-D & GNLP0133-E, GNLP0282	N/A	N/A	N/A	N/A	N/A

Site specific policies - Norwich	Age	Gender	Disability/ pregnancy	Race/ religion	Socio- econom ic
Norwich sites GNLP0401, GNLP0409R, GNLP0451, GNLP0506, GNLP1016R, GNLP2114	N/A	N/A	N/A	N/A	✓
Norwich sites GNLP2163, GNLP2164, 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 CC13, CC15, CC16, CC18, CC24, CC30	N/A	N/A	N/A	✓	✓
Norwich sites R1, R2, R7, R13, R14 and R15, R17, R18, R19, R20, R29	N/A	N/A	N/A	N/A	✓/x
Norwich sites R30, R31, R33, R36	N/A	N/A	N/A	N/A	✓
Norwich R37	✓	N/A	✓	N/A	N/A
Norwich R38	✓	N/A	N/A	N/A	N/A
Norwich R42	✓	N/A	N/A	N/A	N/A
Site specific policies – urban fringe	Age	Gender	Disability/ pregnancy	Race/ religion	Socio- econom ic
Colney GNLP0331R-B, GNLP0331R-C, COL1, COL2, COL3, GNLP0253, BAW2	✓	N/A	✓	N/A	✓
Costessey COS3, COS4, COS5,	N/A	N/A	N/A	N/A	✓
Cringleford GNLP0307, GNLP0327, KES2 (including GNLP0497)	✓	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 GNLP0172, GNLP0351	N/A	N/A	N/A	N/A	N/A
Sprowston GNLP0132	✓	N/A	N/A	N/A	N/A
Taverham GNLP0337R, GNLP0159R	✓	N/A	✓	N/A	N/A
Trowse TROW1	✓	N/A	N/A	N/A	N/A
Site specific policies – towns	Age	Gender	Disability/ pregnancy	Race/ religion	Socio- econom ic
Aylsham GNLP0311, GNLP0595 and GNLP2060, GNLP0596R, AYL3, AYL4	✓	N/A	N/A	N/A	✓
Diss GNLP0102	N/A	N/A	N/A	N/A	N/A
Harleston GNLP2108, GNLP2136, HAR4, HAR5, HAR6, HAR7	✓	N/A	✓	N/A	✓
Hethel GNLP2109, HETHEL1, HETHEL2	N/A	N/A	N/A	N/A	✓

Wymondham GNLP0354R, GNLP3013	N/A	N/A	N/A	N/A	N/A
Site specific policies – key service centres	Age	Gender	Disability/ pregnancy	Race/ religion	Socio-econom ic
Acle GNLP0378, ACL1, ACL2, ACL3	N/A	N/A	N/A	N/A	✓
Blofield GNLP2161, BLO1	N/A	N/A	N/A	N/A	✓
Brundall BRU2, BRU3	N/A	N/A	N/A	N/A	N/A
Hethersett HET1 (part of GNLP0177A), HET2, HET3	✓	N/A	N/A	N/A	N/A
Hingham GNLP0503, GNLP0520, HIN2	N/A	N/A	N/A	N/A	✓
Loddon & Chedgrave GNLP0312, GNLP0463, 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	Socio-econom ic
Blofield Heath GNLP1048, BLO5	N/A	N/A	N/A	N/A	N/A
Buxton with Lamas GNLP0297, BUX1	N/A	N/A	N/A	N/A	N/A
Cawston GNLP0293, CAW1, CAW2	✓	N/A	N/A	N/A	N/A
Coltishall GNLP2019, COL1, COL2	N/A	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	N/A
Gt Witchingham GNLP0608R	N/A	N/A	N/A	N/A	N/A
Horsford, Felthorpe & Haveringland GNLP0264	✓	N/A	N/A	N/A	N/A
Horsham & Newton St Faith GNLP0125R, HNF1, HNF2/ GNLP0466R, SL2007/ GNLP4061/ HNF3	✓	N/A	N/A	N/A	✓
Lingwood, GNLP0380 GNLP0416	N/A	N/A	N/A	N/A	N/A
Marsham GNLP2143	N/A	N/A	N/A	N/A	N/A
Reedham GNLP1001, GNLP3003	N/A	N/A	N/A	N/A	N/A
Salhouse GNLP0188	N/A	N/A	N/A	N/A	N/A
South Walsham GNLP0382, SWA1	✓	N/A	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. Employment opportunities will be promoted at a local level and supporting infrastructure will be provided, which may help to address pockets of deprivation. Increasing the housing stock will address overcrowding and sub-standard housing.
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. The HIA and also the Sustainability Statement requirement will help to ensure access to health, education and transport for all residents, which may address some socio-economic inequalities.
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. Improving the accessibility to public transport will lessen socio-economic inequality by improving cost-effective access to services and school provision will help to improve access to education with the longer-term potential to improve social mobility.
5. Homes identifies policy requirements for older people's housing, accessible and adaptable homes, and sites for Gypsies and Travellers. It supports delivery of older peoples' and supported accommodation on housing sites with good access to local services including on sites allocated for residential use. The aim of this is to integrate older people and others with supported housing needs with the wider community, assisting active retirement and community cohesion. The policy also includes a local requirement to adhere to the national optional Building Regulation standard for adaptable homes. To achieve this 20% of homes on major developments must be designed to be adaptable to meet changing needs over time, enabling people to stay in their homes for longer. This will benefit older people, and those with a physical disability requiring adaptive housing. Increasing the housing stock, in particular the stock of affordable housing, will address overcrowding and sub-standard housing. Although there is some flexibility regarding the percentage of affordable housing to be provided on brownfield sites, policy 5 addresses the need for affordable housing and therefore socio-economic disadvantage.

For residents identifying as Gypsies or Travellers the criteria-based policy allows for additional delivery to meet need throughout the plan period and allows for the expansion of well-located existing sites. Please also see the Whole Plan Impacts section for impact on Gypsies and Travellers.

6. The Economy concentrates development of new services according to a hierarchy of centres which correlates to densely populated areas. The policy has been updated to emphasise that economic development is encouraged at all levels of the hierarchy of defined centres, aiming to avoid the loss of local services. 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. It will also improve the life chances of job seekers without access to private transport. Support for local employment and vocational, further and higher education provision will also address socio-economic inequality.

7 NB The policy for Norwich built-up area has been revised to refer to a programme of improvements to public spaces. Details of this are illustrated in a public realm infrastructure plan, but it can be assumed that improvements to the public realm will afford greater access to anyone with mobility problems. However, since the policy does not give this level of information, the policy has been assessed as not applicable. The introductory text for the other areas covered by the plan refers to elements which will also benefit certain groups and socio-economic inequality (schools, retirement housing etc). However, since the policies for these are contained in the sites plan, the text within policy 7 is also assessed as not applicable.

Site Specific Policies' Impacts

In Norwich, the East Norwich Strategic Regeneration Area includes provision for employment, education and community facilities. Although details will be informed by a master plan, these facilities are likely to benefit children, older people and the local economy, which may improve employment prospects for any pockets of deprivation nearby.

GNLP0506 and GNLP2114 will regenerate areaa in the northern city centre which will improve access to services for residents living around Duke Street, Muspole Street, Magdalen Street and those who shop in Anglia Square. GNLP1016R will provide employment which will be easily accessible to residents in the northern Norwich suburbs.

GNLP2164 will provide employment, also close to the northern city centre.

CC4a allocates land including employment uses, which will be very accessible to residents living close to Mountergate/Ber Street (CC4b does not specify uses).

CC16 and CC24 allocate mixed use to include employment and community facilities. Depending on the delivery of the latter, these allocations could benefit local residents needing access to meeting places as well as employment.

R1 is allocated for employment which will improve access to employment for local residents. R2 is currently a community hub. The allocation allows this use to be expanded, but also allows housing to replace it. This would be a lost facility which may impact negatively on socio-economic inequality. R18 may provide a care home, and this use has been permitted on the site which would benefit older residents. However, the allocation is open to general needs housing, so this impact has not been acknowledged. R29 allocates land for light industrial employment use, which will provide local opportunities for employment.

R30 allocates land for employment. R36 allocates land for community uses. Together, these allocations could benefit local residents needing access to meeting places as well as employment.

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 employment, open space, community or education facilities, but there is no specific allocation which creates a positive impact on any protected group or socio-economic disadvantage.

Colney allocations (apart from BAW2) all provide for additional employment land. Many of these jobs will be specialist and high value research-related. However, there will also be ancillary jobs of a non-specialist nature which could contribute to the local economy in a more accessible way. GNLP0253 is allocated for research and specialist housing for the elderly and healthcare facilities. This will benefit older residents and those with health issues.

Costessey COS3 is allocated for employment uses, which will help to address any local socio-economic inequalities.

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. KES2 is allocated for employment uses, which will help to address any local socio-economic inequalities.

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. The new village hall will benefit local residents needing access to meeting places.

Hellesdon HEL1 includes an allocation for employment uses, which will help access to employment for local residents. HEL2 safeguards a site for school provision. This will benefit children of school age.

Sprowston GNLP0132 includes provision for a new high school and children's play space. This will benefit children of a range of ages.

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 combined allocation requires a primary school. This will benefit children of primary school age. GNLP0596R allocates a 90 bed care unit/extra care housing. This would benefit older residents. AYL3 and AYL4 allocate land for employment use, which will provide opportunities for local employment.

Harleston GNLP2136 requires care housing, older persons' housing 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. HAR5, HAR6 and HAR7 allocate land for employment use, which will provide opportunities for local employment.

Hethel GNLP2109, HETHEL1, HETHEL2 all allocate land for employment. Although this is restricted to high-value, specialist employment, there may be secondary impacts such as less specialised, local jobs created at or near the site. This allocation is, on balance, considered to add to local employment opportunities.

Acle ACL2 and ACL3 allocate land for employment uses, which will provide opportunities for local employment.

Blofield BLO1 is allocated for mixed use to include employment, which will benefit local residents.

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

Hingham HIN2 allocates land for employment uses, which will provide opportunities for local employment.

Loddon and Chedgrave LOD3 allocates land for employment uses, which will provide opportunities for local employment.

Poringland/Framingham Earl POR3 allocates land for employment uses, which will provide opportunities for local employment.

Reepham REP1 requires provision of a sports hall for the high school. This will benefit children of high school age. REP2 allocates land for employment uses, which will provide opportunities for local employment.

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.

Foulsham FOU2 allocates land for employment uses, which will provide opportunities for local employment.

Horsford GNLP0264 requires enhanced pedestrian crossing facilities specifically for children's use, although the facility will benefit the wider population.

Horsham & Newton St Faith HNF1 includes a potential to include play space. If this is delivered, it will benefit children. HNF2/GNLP0466R and SL2007/GNLP4061/ HNF3 allocate land for a range of employment uses, which will provide opportunities for local employment.

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 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 PSED to the entire 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 GNLP 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. Additionally, it is considered that some minority faith groups may benefit from local community buildings, to allow a place to gather, reflect or worship. The GNLP does allocate a few of these alongside large residential developments, or in locations which currently lack such facilities.

The area has a small number of ethnic minority residents. Of these, a 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 2038. 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 2038. The GNLP does not allocate additional pitches to meet this need, as no sites have been submitted for this use. Since no Gypsy and Traveller sites have been submitted for consideration through the local plan, the intention is to bring additional sites forward through the Development Management process as well as having this criteria-based policy to allow further sites to come forward.

Disability

The range of potential disabilities may result in a wide range of physical limitations. Of these, due to the strategic nature of local plan policies, the disability which a local plan has the most opportunity to address is limited mobility. The 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 a Healthy Life, and requires a Health Impact Assessment for some schemes.

Applying the PSED to the entire GNLP, is there any impact (positive or negative) on any socio-economic inequalities?

Deprivation has a number of measures, including access to education and skills training, social mobility, unemployment, inadequate housing and more. There are pockets of deprivation throughout the Greater Norwich area. In considering this aspect, the strategic provision of affordable housing alongside the provision of 'local' jobs are considered to be the most effective methods to address such inequalities. It is considered that the GNLP addresses deprivation through a range of such measures.

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 Equality Act, building regulations and Building for a Healthy Life (encouraged by policy 2). It is not considered that a strategic document such as the 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 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. However, the lack of allocated sites is considered to be a negative impact for this protected group.

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 and to address socio-economic disadvantage, 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 and socio-economic inequality will be monitored through the following.

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.

Indicator Code	Theme (protected group)	Indicator
GNLP1	Population and communities (socio-economic)	To improve the district authority ranking of the least deprived communities in England, taken from the seven domains of the English Indices of Multiple Deprivation.
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.
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 Economy objective – To support and promote clean growth and progress towards a post-carbon economy through the expansion of internationally important knowledge-based industries in the Cambridge

Norwich Tech Corridor as part of an entrepreneurial, enterprising, creative and broad-based economy with high productivity and a skilled workforce.

Indicator Code	Theme (protected group)	Indicator
GNLP8	Jobs (socio-economic)	To increase the annual count of jobs, taken from the Business Register and Employment Survey (BRES) across the local plan area.
GNLP9	Employment (socio-economic)	To increase the employment rate of the economically active population (taken from the official labour market statistics, Nomis).
GNLP10	Earnings (socio-economic)	To increase median earnings: a) hourly b) weekly c) annual pay for full-time employees, taken from the Annual Survey of Hours and Earnings (ASHE) by the Office of National Statistics.
GNLP11	Skills (socio-economic)	To increase the percentage of workforce employed in higher occupations (official labour market statistics, Nomis).

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.

Indicator Code	Theme (protected group)	Indicator
GNLP33	Housing (socio-economic)	The total number of new affordable tenure dwellings completed.
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.
GNLP36	Affordable housing (socio-economic)	To monitor the percentage of sites of 10 or more homes that achieve 33% affordable housing.
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).

GNLP Infrastructure objective – To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to economic and social opportunities.

Indicator Code	Theme (protected group)	Indicator
GNLP41	Transport and access to services (disabled, children, elderly, socio-economic)	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 Greater Norwich Local Plan, together with the supporting text and appendices, will be available in different languages upon request. The 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 at Appendix 2 of the GNLP. There is also a glossary at the end of this report.

Conclusion

Although it is considered that (other than the absence of allocated Gypsies & Travellers' sites) the 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. The GNLP offers a range of ways to address socio-economic inequality. No further Equalities Impact Assessment is considered necessary for this policy document.

Glossary

The following terms are used in this report.

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 by the Equality Act 2010	Public Sector Equality Duty, as defined
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 which apply across the entire plan area.