

Equality Impact Assessment (EIA): Leicester Local Plan (2020-2036)

Title of proposal	Leicester Local Plan (2020 – 2036)
Name of division/service	Planning, Development and Transportation
Name of lead officer completing this assessment	Joseph Todd/Aaron Basi
Date EIA assessment completed	Ongoing and to be updated throughout decision making process
Decision maker	e.g. City Mayor/Assistant Mayor/Director
Date decision taken	

EIA sign off on completion:	Signature	Date
Lead officer	Joseph Todd / Aaron Basi	28/09/2022
Equalities officer	Sukhi Biring	28/09/2022
Divisional director	Andrew L Smith	29/09/2022

Please ensure the following:

- a) That the document is **understandable to a reader who has not read any other documents** and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy but must be complete and based in evidence.
- b) That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- c) That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.

The information in this document has been used to support the preparation of the Local Plan. If you need assistance reading this document, or require it in a different format, please contact us via email_planning.policy@leicester.gov.uk or call on 0116 454 0085.

- d) That the equality impact assessment is started at an early stage in the decision-making process, so that it can be used to inform the consultation, engagement and the decision. It should not be a tick-box exercise. Equality impact assessment is an iterative process that should be revisited throughout the decision-making process. It can be used to assess several different options.
- e) Decision makers must be aware of their duty to pay 'due regard' to the Public Sector Equality Duty (see below) and 'due regard' must be paid before and at the time a decision is taken. Please see the Brown Principles on the equality intranet pages, for information on how to undertake a lawful decision-making process, from an equalities perspective. Please append the draft EIA and the final EIA to papers for decision makers (including leadership team meetings, lead member briefings, scrutiny meetings and executive meetings) and draw out the key points for their consideration. The Equalities Team provide equalities comments on reports.

1. Setting the context

Describe the proposal, the reasons it is being made, and the intended change or outcome. Will the needs of those who are currently using the service continue to be met?

In July 2021 the Government published the revised National Planning Policy Framework (NPPF). The NPPF requires Local Planning authorities like Leicester City Council to support sustainable development and to plan positively for it by preparing new Local Plans. In view of this, Leicester City Council has produced a draft Local Plan which sets out the vision and objectives for the growth of the city over the next 15 years.

The plan will:

- Identify locations for development
- Allocate strategic development sites
- Set clear policies that guide decisions on planning applications
- Indicate how the plan will be delivered and how progress will be monitored

Its purpose is to provide the overall strategic and spatial vision for the future of Leicester administrative area. The Local Plan must be flexible to allow for future changes in circumstances, including different policy frameworks or changes to the local, regional or national economy. Proposed development also needs to be viable, taking into account costs and timeframes for development. This is important as the current economic climate presents significant challenges for how the city would develop. Building on recent progress in house building and job creation, the Local Plan will provide the framework and certainty that will attract investment to Leicester allowing us to guide investment in ways that the community has signed up to.

The Leicester Local Plan is the development plan for the city and sets out the vision and framework for future development for the plan period 2020 to 2036. The draft Leicester Local Plan will replace the existing Core Strategy (2014) and Saved Policies from the 2006 Adopted Local Plan. A range of evidence (e.g. Health Impact Assessment & Transport Assessment) has been commissioned or undertaken by the Council to underpin the Local Plan.

Once adopted, the Local Plan will be used to manage development through the determination of planning applications, making it clear where development is acceptable and helping to provide certainty for the local community that the development planned is co-ordinated, well designed and will make a positive contribution to the city.

The Local Plan includes numerous different policies. This equality impact assessment considers the potential for disproportionate impacts and opportunities for advancing equality of opportunity and fostering good relations in respect of the Local Plan. However, this does not negate the need to consider individual policies in greater detail in relation to the PSED aims. The approach has been to undertake a high-level assessment (RAG) in partnership with individual service areas on policy areas which are likely to impact on people with different protected characteristics. The aim of this is to identify key areas of focus and where a more detailed individual equality impact assessment on a specific policy, undertaken by the service area is likely to be required. In order to achieve positive equalities outcomes, there will be an on-going commitment from all service areas involved to assess and, where they exist, to mitigate, disproportionate impacts on particular protected characteristics. The PSED is an on-going duty and should be paid proportionate attention according to the relevance at various stages.

The Draft Plan was out for consultation between September and December 2020. The Plan will be further published for consultation on the Submission version which will then be submitted to the Government for independent examination before being adopted by the council. This version will include responses to the consultation on the Draft Plan and should be out for consultation in

October/November 2022. The City Council are working with District Councils on the housing unmet need, a Statement of Common Ground should be agreed by late spring.

Stages of the Local Plan

Issues and Options - October 2014 to Jan 2015

Emerging Options consultation – July to December 2017

Draft Local Plan stage (preferred options) – September 2020 to December 2020

Submission – March 2023

Adoption – October 2023

2. Equality implications/obligations

Which aims of the Public Sector Equality Duty (PSED) are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes.

a. Eliminate unlawful discrimination, harassment and victimisation

- How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic?
- Is this a relevant consideration? What issues could arise?

The Local Plan has the potential to impact positively on all residents and visitors to Leicester, with equalities implications considered at an early stage and integrated into policy development. The policies set out within the plan guide development and promote opportunities, for example they include policies for the allocation of housing sites to meet housing need, allocating employment sites and spaces for commercial development to boost and support the economy as well as protecting and enhancing the natural and built environment. The plan proposes policies that will benefit the community, including those with protected characteristics. There are specific policies (e.g. DQP03 and T03) where accessible design will need to be a central feature, in order to ensure that potential barriers to access are anticipated and avoided.

b. Advance equality of opportunity between different groups

- How does the proposal/service ensure that its intended outcomes promote equality of opportunity for people?
- Identify inequalities faced by those with specific protected characteristic(s).
- Is this a relevant consideration? What issues could arise?

The Local Plan will have a broad and positive impact on advancing equality of opportunity on all sections of our communities. Several policies will benefit the wider community and aim to deliver improved and accessible transport, recreation, education and other infrastructure and services, for the benefit of all. The housing mix policies aim to deliver a range of housing that will benefit those with special needs including older people, those with disability, and those who aren't able to afford market housing as well as meeting the needs of gypsies and travellers.

c. Foster good relations between different groups

- Does the service contribute to good relations or to broader community cohesion objectives?
- How does it achieve this aim?
- Is this a relevant consideration? What issues could arise?

The Local Plan proposes policies aimed at supporting cohesive and inclusive development through appropriate design, layout, mixed housing, retail, employment, and environmental policies that contribute positively to broader community cohesion. The Local Plan sets out within it, inclusive development and aims to foster good relations between those who share a protected characteristic and those who do not.

3. Who is affected?

Outline who could be affected, and how they could be affected by the proposal/service change. Include people who currently use the service and those who could benefit from, but do not currently access the service.

The Local Plan considers development throughout the whole city and will affect everyone who lives and works in Leicester. At the time of writing the Local Plan and supporting documents, the 2021 census data has not yet been published, therefore, 2011 census data is used in most cases.

Leicester's population is 368,200 in latest estimates in the 2021 census. Leicester's population is relatively young compared with England; a third of all city households include dependent children, 20% of Leicester's population (71,539) are aged 20-29 years

(13% in England) and 12% of the population (43,602) are aged over 65 (19% in England). The large proportion of younger people in Leicester reflects the student population attending Leicester's two universities and inward migration to the city.

People with disability

In 2011, over a quarter (32,447) of city households included a person with a long-term health problem or disability that limits the person's day-to-day activities, and has lasted, or is expected to last, at least 12 months. This includes problems that are related to old age. Table 1 shows that, compared to its local authority peer comparators, Leicester shares the second lowest proportion of those indicating their activities are limited, and has the second lowest proportion finding their day-to-day activities are 'limited a lot':

Table 1: Long-term health problem or disability

Local authority (district or unitary)	All usual residents	Day-to-day activities limited a lot	Day-to-day activities limited a little	% of residents with day-to-day activities limited a lot	% of residents with day-to-day activities limited a little	% of residents with day-to-day activities limited a little or a lot
Birmingham	1,073,045	98,181	99,720	9.1%	9.3%	18.4%
Nottingham	305,680	27,699	27,683	9.1%	9.1%	18.1%
Coventry	316,960	27,578	28,669	8.7%	9.0%	17.7%
Bradford	522,452	43,975	46,552	8.4%	8.9%	17.3%
Leicester	329,839	27,615	29,522	8.4%	9.0%	17.3%
Luton	203,201	14,073	16,514	6.9%	8.1%	15.1%

Source: Census 2011

A quarter of Leicester households in which at least one person has a long-term health problem or disability (7,909) also include dependent children. As expected, the incidence of disability in the city is highest in areas where the population is older (such as Thurncourt), and lower where the population is younger (for example, the city centre).

Moreover, the Active Lives Survey 2019-20 shows health inequalities in physical activity levels. Those living with a long-term limiting disability are almost 10% more likely to be inactive (39%) than those without a disability (27%) The link for the Active Lives Survey 2019-20 can be found here <https://activelives.sportengland.org/Result?queryId=64298>.

In 2011, 9% of usual city residents were providing unpaid care (30,965). Of this group, over two-fifths (43%) were giving 20 or more hours care a week (13,462). Some of these people are young carers. The level of unpaid caregiving in the city is lower than that in the East Midlands region (11%) and England (10%). This is due, in part, to the relatively youthful age profile of Leicester, for example, 6% fewer older people households than regional and national averages. The Leicester Health and Wellbeing Survey 2018 showed that 13% of residents look after a family member, partner or friend who needs help because of their illness, frailty or disability.

Migration

Leicester is home to a diverse range of faiths and communities. Leicester residents come from over 50 different countries. Around a third of Leicester residents were born outside of the UK and 34% of these (53,000) arrived in the UK between 2001 and 2011, principally from Eastern Europe. In addition to this, the arrival of third country nationals (this includes individuals who are in transit and/or applying for visas in countries that are not their country of origin or individuals who have come via the UK either as students or because of government recruitment to address labour shortages), accounts for some of this migration.

Leicester is a National Asylum Seeker Service (NASS) designated dispersal city and is host to about 1,000 of the 2,500 asylum seekers resident in the East Midlands.

The Local Plan will take into account the demographics of Leicester to inform need and there is a range of evidence underpinning the policies contained within the Local Plan. The consultation responses so far have been taken into account in policy development and the consultation responses from the consultation between September 2020 and December 2020 have been reviewed in the final plan. Equality Monitoring is being undertaken as part of the consultation to ensure that the response

is representative of people from across a range of protected characteristics in line with the demographics of Leicester. There will also be engagements targeted at stakeholder groups who may be able to offer insights into the possible impacts for particular protected characteristics and groups like e.g. Racial Minority CVS, NHS National Commissioning Board; Age UK; Federation of Muslim Organisations (Leicestershire); Mencap and The Georgian Group.

Generally, the Local Plan aims to be positive for all, however it is recognised that there needs to be additional consideration paid in respect of the needs of people with specific protected characteristics to ensure that the policies are inclusive and that everyone is able to reap the same benefits regardless of protected characteristic. We have an evidence base supporting documents upon which the policies have been drafted, which take these aspects into account. However, consultation is a further opportunity to check that there are no disproportionate impacts which have not yet been identified or mitigated.

4. Information used to inform the equality impact assessment

- What **data, research, or trend analysis** have you used?
- Describe how you have got your information and what it tells you
- Are there any gaps or limitations in the information you currently hold, and how you have sought to address this? E.g. proxy data, national trends, equality monitoring etc.

The Leicester Local Plan has been informed by the aims of other city-wide plans and strategies including:

- Health and Wellbeing Strategy (Adults and Children)
- Air Quality Strategy
- Cycling Strategy
- Local Transport Plan
- Local Cycling and Walking Infrastructure Plan (LCWIP)
- Leicester Tourism Action Plan

- Leicester Food Plan
- Climate Change Action Plan (2021)

The Local Plan has been informed by the Census data from the ONS and previous consultations (Issues and Options & Emerging Options and the Regulation 18 draft plan). These were public consultations during which all people in the city including statutory organisations, and where possible groups with protected characteristics, were given an opportunity to comment on the plan. For further, more detailed information please see the consultation responses from the Issues and Option consultation 'You said, we did' on our website:

[Draft Leicester Local Plan 2020 - Leicester City Council - Citizen Space](#)

Evidenced based studies further underpin the Local plan on the housing need and mix, which is constantly updated as part of work towards the submission stage of the plan.

Equalities monitoring information was collected as part of the consultation on the draft local plan between September 2020 and December 2020. The results from the equality monitoring information show there was slightly more comments from women compared with men (c. 45% for women and 37% for men), with a range of different beliefs and religions who took part in the online consultation; as well as a diverse mix of people with ethnic backgrounds which represent a good range of views in line with the demographics of Leicester.

Only a few participants mentioned that they have disabilities such as hearing issues (deafness, severe hearing impairment), mental health issues (e.g. anxiety, dementia), mobility issues (e.g. using a wheelchair, Arthritis), learning difficulty or disability (e.g. Down's syndrome, dyslexia, autism) as well as physical impairment (e.g. difficulty using arms, poor eyesight) and long-standing illness or health condition (e.g. cancer, HIV, diabetes, chronic heart disease, epilepsy).

The upcoming final submission consultation will aim to encourage all people living, working, or with an interest in the city to submit their comments on the Local Plan as well as the evidence base.

The representations received during this consultation have found that no adverse impacts to any groups with protected characteristics have been identified so far. Each comment has been considered by the council and responses from the Planning Policy team will be released alongside the submission version of the Local Plan. The consultation database will be further updated following the consultation.

5. Consultation

What **consultation** have you undertaken about the proposal with people who use the service or people affected, people who may potentially use the service and other stakeholders? What did they say about:

- What is important to them regarding the current service?
- How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)?
- Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

The Council has utilised a range of previous consultation activity and evidence to help formally shape the vision and Objectives for the city for the next 15 years. The Statement of Community Involvement (SCI) sets out how the public, organisations and other interested parties are involved and engaged in the preparation the new Local Plan. The SCI produced and was amended in reflection of Covid-19 impacts. Consultation on Issues and Options was undertaken from October 2014 to January 2015. The original consultation period was extended to provide the community of Leicester and other stakeholders with more time to suggest any issues that they feel should be addressed, comment on which options they think are most appropriate, or tell us about any other options that they may have. Consultation on the draft Local Plan (Emerging Options) was undertaken from July to December 2017. Further consultation on the draft local plan stage was undertaken between September 2020 and December 2020. This was initially scheduled for March 2020 but was delayed due to Covid 19 restrictions, to allow for more participation from members of the public and other stakeholders. The period of time for consultation was extended beyond existing typical timescales to allow more people to comment on the plan and notifications were sent out to inform of this delay. This is explained in more detail within the consultation methods section below.

Consultation Methods

Internet: E-government

In accordance with government regulations the draft Local Plan was available to view on the council's website during the full length of the consultation period. The initial consultation period was due to take place in March 2020 but was delayed due to Covid restrictions, an explanation of the delay was provided upon undertaking the consultation in September 2020 to inform respondents and ask for their views on the plan as usual. An online questionnaire was also available to complete and submit electronically during the consultation. Alternatively, an email contact address as well as a postal address was provided for comments to be sent directly to the council. Existing consultees (including statutory consultees) on the consultation database, local councillors and members of parliament were directly invited predominantly via an email (due to Covid 19 restrictions) to comment on the document to cover a wide range of different organisations. The ability to send letters and for residents to receive letters was more limited due to Covid 19 restrictions, so this email method was most important to be able to include more people. However, a leaflet directing people to the consultation internet pages was sent to all households within Leicester and greater Leicester Urban area.

Hard Copies

Members of the public had the opportunity to inspect the draft document and submit a representation on the response form at council offices and in libraries across the city. Customer service teams were informed of how to direct stakeholders to consultation hub and keep them updated of location of hard copies. Covid 19 restrictions caused some public spaces to close during the consultation, which had impacts on people being able to view the documents in these places. This did have impacts to those with lower levels of computer literacy, however hard copies were able to be requested throughout the consultation period by contacting the planning department to request this to be sent via post in order to provide an alternative service. The consultation period was extended past usual timescales to allow these groups to receive, review and respond with their comments. These approaches were used to consult those who may have been digitally excluded.

Local Media

The council publicised details of consultation through the local media. There was a press release in the Leicester Mercury and an item on the Local Plan was broadcast on BBC Radio Leicester. In addition, consultation was also publicised via social media on Twitter, Facebook and e-bulletin's on Your Leicester. Furthermore, we sent citywide letters to all households to inform about

the Local Plan consultation.

Presentations / Exhibitions

Presentations and subsequent discussions took place online due to Covid 19 restrictions. This provided the public with an opportunity to provide feedback on the draft document in an informal environment and directed people to the consultation hub to submit formal views. Face to face workshops might not have been appropriate at the time of consultation as people may have been required to stay at home due to isolation guidance (in particular some of those with protected characteristics) and possible venues may not have been open to the public. Social distancing requirements caused by Covid 19 restrictions may have restricted the number of people who could attend and limit the ability for certain groups to communicate. This influenced the decision to hold presentations online to allow the most amount of people to participate, an example of this was ward meetings. Where some people were having difficulties making written representations and using the internet (for example through language barriers or with visual impairments), the council encouraged these groups to nominate someone to share views on their behalf or make representations over the telephone. These were dealt with on a case-by-case basis and checked with the equalities and communication teams.

Workshops

To help develop policies and proposals, online workshops were held for stakeholders, community groups and organisations. These events involved high level presentations on the local plan and sites in ward meetings followed by additional engagement discussions where needed. The agenda of each workshop was clearly set out beforehand with discussions encouraged to ensure meaningful engagement. As part of understanding the impacts potential policies might have had on different protected characteristics, the council organised a workshop specifically for the Leicester Racial Minority Voluntary and Community Sector (VCS) Assembly. During the workshop the council emphasised the importance of the Local Plan, the key issues it sets out, the timetable, the consultation process and where as well as how individuals and organisations can take part. The workshop included a discussion regarding issues relating to equality, as well as content to be considered as part of the Local Plan Equalities Impact Assessment. These workshops were carried out at the Emerging Options consultation, but not for the Regulation 18 consultation due to covid-19.

In addition, as part of the New Local Plan, contact information is provided for people who need help reading the document or require the Local Plan in another format.

Letters/site notices to residents at/near sites

Letters were sent out to residents nearby to the proposed site allocations, and site notices put up, to provide locals with more specific information about the nearby site allocation. This allowed local people to be made aware of the proposed allocation at an early stage and as much information as possible provided to allow people to submit a full consultation response. This also helped to allow people with protected characteristics to raise any local issues e.g. for site allocations and disability access.

Letters to site owners

Letters were sent out to site owners to inform them that their site is proposed for allocation and invite comments on the local plan. This helped to understand any changing circumstances with the sites and identify any protected characteristics for site owners.

Duty to Cooperate

There is a duty to cooperate in the Local Plan process and the council has engaged with its partners. Leicester City Council has embraced the Duty to Cooperate through actively engaging with the other district and boroughs councils within Leicestershire. This has ensured a proactive, focused and continuous approach to strategic planning. This has successfully enabled the Council and its neighbours to recognise cross boundary issues (such as allocations of sites) and identify the need or otherwise for joint or individual policy responses. Leicester City Council declared an unmet need for both housing and employment land in 2017. The Leicester and Leicestershire authorities are working together to resolve how this unmet need can best be addressed.

A full report on the consultation comments and the Council's response is available as part of the evidence base for consultation for the draft Local Plan. A further statement will be made available within the Regulation 19 submission of the Local Plan which is due to take place later in 2022.

6. Potential Equality Impact

Based on your understanding of the service area, any specific evidence you may have on people who use the service and those who could potentially use the service and the findings of any consultation you have undertaken, use the table below to explain which individuals or community groups are likely to be affected by the proposal because of their protected characteristic(s). Describe what the impact is likely to be, how significant that impact is for individual or group well-being, and what mitigating actions can be taken to reduce or remove negative impacts. This could include indirect impacts, as well as direct impacts.

Looking at potential impacts from a different perspective, this section also asks you to consider whether any other particular groups, especially vulnerable groups, are likely to be affected by the proposal. List the relevant groups that may be affected, along with the likely impact, potential risks and mitigating actions that would reduce or remove any negative impacts. These groups do not have to be defined by their protected characteristic(s).

Protected characteristics

Impact of proposal:

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. Why is this protected characteristic relevant to the proposal? How does the protected characteristic determine/shape the potential impact of the proposal? This may also include **positive impacts** which support the aims of the Public Sector Equality Duty to advance equality of opportunity and foster good relations.

Risk of disproportionate negative impact:

How likely is it that people with this protected characteristic will be disproportionately negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?

Mitigating actions:

For disproportionate negative impacts on protected characteristic/s, what mitigating actions can be taken to reduce or remove the impact? You may also wish to include actions which support the positive aims of the Public Sector Equality Duty to advance equality of opportunity and to foster good relations. All actions identified here should also be included in the action plan at the end of this EIA.

a. Age

Indicate which age group/s is/ are most affected, either specify general age group - children, young people working age people or older people or specific age bands

What is the impact of the proposal on age?

Positive impact. The aim of policies Ho01 – Ho12 of the proposed Local Plan is to ensure a wide range of housing development. This also includes homes for certain groups of people like elderly and students (who are usually, although not always, within a particular age range). These age groups may include older people, young people and families with children who may need affordable housing if they cannot enter the housing market. Policy Ho04 seeks to ensure affordable housing in particular.

Climate change policies look to ensure that development provides sustainable design and reduces carbon emissions, whilst increasing energy efficiency. This should be beneficial to elderly and young people in particular, helping to reduce costs and improving health.

Open Space policies will benefit all age groups, particularly children through the provision of play areas and facilities, including retaining existing playing pitches.

Design policy DQP03 support inclusive design by meeting the needs of disabled and elderly people in new development. This supports safety and convenience in new development to react to demographic trends.

It is the government's requirement to meet the needs of older people, those with children, students through the Local Plan policies. Having identified the need based on existing evidence (to be updated shortly), the protected characteristic group will have their needs met through the draft policies of the Local Plan.

What is the risk of disproportionate negative impact on age?

Not likely to have any disproportionate negative impact as the needs of different age ranges have been considered in policy development, however the upcoming consultation may provide further information to inform if there are any disproportionate impacts which have not been identified to date.

What are the mitigating actions?

During both the emerging options consultation undertaken in 2017 and the draft local plan in 2020, the council monitored information relating to equalities, this helped obtain views from a range of different ages in line with the demographics of Leicester.

In addition, the council informed organisations like 'Age UK' to get a better overview about the issues and ideas of age-related groups.

b. Disability

If specific impairments are affected by the proposal, specify which these are. Our standard categories are on our equality monitoring form – physical impairment, sensory impairment, mental health condition, learning disability, long standing illness or health condition.

What is the impact of the proposal on disability?

Positive impact. The objectives of Policy DQP03 seek to ensure that proposals are accessible and adaptable to people with disabilities e.g. wheelchair accessible homes, as well as public places.

The objectives of the Policy Ho03 seek to ensure that proposals for wheelchair accessible dwellings will be encouraged to meet the technical standard for access of Building Regulations 2015 Part M4(3), or any subsequent revision.

Retail, leisure and health facilities are required to be accessible for everyone as well (Policy CT01, CT02, TCR03, OSSR03). This includes the use of advertisement and associated impacts to highway safety which is covered by policy DQP09.

The purpose of the planning system is to contribute to sustainable development. (NPPF, para 6). Also transport policies proposed in the draft plan seek to promote accessible public transport, particularly in policies T01 and T03

The needs of the protected characteristic are relevant to the proposal as it is the government requirement to meet the needs of the community, including those with disabilities. There is significant potential to advance equality of opportunity through the built environment and infrastructure, provided the needs of people with different protected characteristics are fully taken into account in the early policy and planning stages, through to design.

The proposals in the draft Local Plan have been consulted on as part of the draft consultation, and all people were given an opportunity to comment on the Local Plan. As part of the consultation process, the documents were made available in an accessible format on request.

What is the risk of disproportionate negative impact on disability?

Not likely to have any disproportionate negative impact as the needs of people with different disabilities have been considered in policy development. However, the consultation has provided some further information to inform if there are any disproportionate impacts which have not been identified to date. Responses will be made to consider the needs of the people with particular protected characteristics such as this and published as part of the full submission for further engagement.

What are the mitigating actions?

Most of the documents on our websites are uploaded in an accessible format which means it is in an easy to read format for screen readers which will help people with visual impact. At the beginning of the Local Plan there is a telephone number and email address where alternative versions can be requested including a large printed format, to help with the language for people whose native language is not English.

The consultation involved engaging with groups representing this protected characteristic and others, to ensure that this was representative and obtained views from a range of people who may have particular needs arising from a disability. Equality monitoring took place as part of the consultation and will continue to be undertaken.

c. Gender reassignment

Indicate whether the proposal has potential impact on trans men or trans women, and if so, which group is affected.

What is the impact of the proposal on gender reassignment?

There will be a neutral impact for this specific group. However, they will not be excluded from receiving the positive benefits that are intended for all.

What is the risk of disproportionate negative impact on gender reassignment?

Not likely to have any disproportionate negative impact.

What are the mitigating actions?

Not applicable.

d. Marriage and civil partnership

What is the impact of the proposal on marriage and civil partnership?

There will be a neutral impact for this specific group. However, they will not be excluded from receiving the positive benefits that are intended for all.

What is the risk of disproportionate negative impact on marriage and civil partnership?

Not likely to have any disproportionate negative impact. Marriage and civil partnership, under the Equality Act only protects you from discrimination at work because you are married or in a civil partnership.

What are the mitigating actions?

Not applicable.

e. Pregnancy and maternity

What is the impact of the proposal on pregnancy and maternity?

There will be a neutral impact for this specific group. However, they will not be excluded from receiving the positive benefits that are intended for all.

What is the risk of disproportionate negative impact on pregnancy and maternity?

Not likely to have any disproportionate negative impact.

What are the mitigating actions?

Not applicable.

f. Race

Given the city's racial diversity it is useful that we collect information on which racial groups are affected by the proposal. Our equalities monitoring form follows ONS general census categories and uses broad categories in the first instance with the opportunity to identify more specific racial groups such as Gypsies/Travellers. Use the most relevant classification for the proposal.

What is the impact of the proposal on race?

The Local Plan policies, proposals and allocations will aim to ensure that sites are available to provide sufficient housing to meet a significant proportion of housing needs of all groups in Leicester.

In terms of housing, the Local Plan supports the delivery of mixed sizes and tenures, including the provision of affordable housing for all groups in need. No disproportionate negative impacts upon any racial group has been identified at this stage.

The local plan will look to support a diverse range of businesses including racial minority owned businesses in Policy E07. Similarly, policy CT02 looks to provide Assets of Community Value which should encourage any communities to share spaces.

Gypsies and Travellers are considered in a specific policy. An accommodation needs assessment has been carried out, which has informed Policy Ho12 of the proposed Local Plan. The city needs to plan to accommodate seven permanent Gypsy and Traveller

pitches over the plan period to 2036, as well as additional twelve to twenty transit pitches. In helping to provide decent residential accommodation for all, the City Council will meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

What is the risk of disproportionate negative impact on race?

Not likely to have any disproportionate negative impact.

What are the mitigating actions?

For people whose first language is not English, special requests can be made via telephone for alternative provision.

No other mitigations applicable until and unless any impacts identified through the consultation.

g. Religion or belief

If specific religious or faith groups are affected by the proposal, our equalities monitoring form sets out categories reflective of the city's population. Given the diversity of the city there is always scope to include any group that is not listed.

What is the impact of the proposal on religion or belief?

The policy CT05 Places of Worship seeks to retain these places and associated community facilities unless it can be demonstrated that there is no longer a need for them. Places of Worship can cause a lot of traffic and noise. Therefore, these issues need to be carefully addressed in selecting suitable locations for Places of Worship and when considering proposal for redevelopment or extension. Overall, there will be a neutral impact for this specific group.

What is the risk of disproportionate negative impact on religion or belief?

Not likely to have any disproportionate negative impact if the issues of noise and traffic can be adequately addressed and considered.

What are the mitigating actions?

Not applicable until and unless the places of worship will have any impacts on highway safety and function, or nearby residential amenity

h. Sex

Indicate whether this has potential impact on either males or females

What is the impact of the proposal on sex?

Policies in the 'Delivering Quality Places' like DQP01 and DQP03 ensure that all places are designed as high quality overlooking places to give everyone the feeling of safety. All these policies in the proposed Local Plan will have an impact upon everyone who lives in, works in, has business in, travels through or visits Leicester. This is expected to impact on people of a different sex or gender in the same way. There are no disproportionate negative impacts identified at this stage, resulting from the Local Plan objectives and proposed policies.

What is the risk of disproportionate negative impact on sex?

Not likely to have any disproportionate negative impact.

What are the mitigating actions?

Not applicable until and unless any impacts identified through the consultation.

i. Sexual orientation

What is the impact of the proposal on sexual orientation?

There will be a neutral impact for this specific group. However, they will not be excluded from receiving the positive benefits that are intended for all.

What is the risk of disproportionate negative impact on sexual orientation?

Not likely to have any disproportionate negative impact.

What are the mitigating actions?

Not applicable until and unless any impacts identified through the consultation.

7. Summary of protected characteristics

a. Summarise why the protected characteristics you have commented on, are relevant to the proposal?

The Local Plan will have an impact on all those living and working in Leicester. Therefore, all the protected characteristics are relevant to the proposals, some more directly than the others. The policies aim to support inclusive and cohesive development.

b. Summarise why the protected characteristics you have not commented on, are not relevant to the proposal?

N/A

8. Other groups

Other groups

Impact of proposal:

Describe the likely impact of the proposal on children in poverty or any other people who we may consider to be vulnerable, for example people who misuse substances, ex armed forces, people living in poverty, care experienced young people, carers. List any vulnerable groups likely to be affected. Will their needs continue to be met? What issues will affect their take up of services/other opportunities that meet their needs/address inequalities they face?

Risk of disproportionate negative impact:

How likely is it that this group of people will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?

Mitigating actions:

For negative impacts, what mitigating actions can be taken to reduce or remove this impact for this vulnerable group of people? These should be included in the action plan at the end of this EIA. You may also wish to use this section to identify opportunities for positive impacts.

a. Children in poverty

What is the impact of the proposal on children in poverty?

The proposal will have a positive impact on children with poverty, as the draft policies include affordable housing policy, which will

seek to encourage the provision of affordable housing in the City. The draft policies are currently based on the existing evidence which has been updated prior to submission.

Open Sports, Space and Recreation chapter seeks to retain open space and playing pitches in Leicester which would have a positive impact for children in poverty having ease of access to open space.

What is the risk of negative impact on children in poverty?

Not likely to have any disproportionate negative impact.

What are the mitigating actions?

Not applicable unless any impacts identified through the consultation.

b. Other vulnerable groups

What is the impact of the proposal on other vulnerable groups?

The health and wellbeing chapter ensures that a wide range of groups will be considered in the Local Plan e.g. families, people living in poverty as well as people with different health issues like obesity. The proposal will have a neutral impact on any of the groups.

What is the risk of negative impact on other vulnerable groups?

Not likely to have any disproportionate negative impact.

What are the mitigating actions?

Not applicable until and unless any impacts identified through the consultation.

c. Other (describe)

What is the impact of the proposal on any other groups?

N/A

What is the risk of negative impact on any other groups?

N/A

What are the mitigating actions?

N/A

9. Other sources of potential negative impacts

Are there any other potential negative impacts external to the service that could further disadvantage service users over the next three years that should be considered? For example, these could include:

- other proposed changes to council services that would affect the same group of service users;
- Government policies or proposed changes to current provision by public agencies (such as new benefit arrangements) that would negatively affect residents;
- external economic impacts such as an economic downturn.

The Planning White paper is currently going through the consultation process before these are implemented. The exact plans for this are not yet finalised but this seeks to make local plans more digitally active, which could present a potential barrier to some protected characteristics. This will continue to be reviewed in line with this Equality Impact Assessment.

Impacts from Covid 19 have not yet been fully analysed nationally yet, this could have adverse impacts on the economy and so will be reviewed to ensure that the policies do not exacerbate problems for people with protected characteristics.

10. Human rights implications

Are there any human rights implications which need to be considered and addressed (please see the list at the end of the template), if so please outline the implications and how they will be addressed below:

The specific Articles of the ECHR relevant to planning include Article 6 (Right to a fair and public trial within a reasonable time), Article 8 (Right to respect for private and family life, home and correspondence), Article 14 (Prohibition of discrimination) and Article 1 of Protocol 1 (Right to peaceful enjoyment of possessions and protection of property).

11. Monitoring impact

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered.

If you want to undertake equality monitoring, please refer to our [equality monitoring guidance and templates](#).

Authority Monitoring Report (AMR)

RAG rating is taking a more detailed look at potential impacts of individual policies. The Authority Monitoring Report will be key in monitoring the policies of the proposed Local Plan. Aside from this, public consultations at different stages will be key in identifying any gaps in the proposed Local Plan. In order to ensure that we have gained a range of views from people with different protected characteristics, we will equality monitor the consultation responses. Once adopted the Local Plan will be reviewed every five years in correlation with government guidance or sooner if necessary. The subsequent reviews will undergo public consultations as well as EIAs which will help identify any impacts as the Plan progresses.

Statement of Community Involvement (SCI) - Regular updating and publishing of the SCI outlining the consultation procedures will help identify any gaps.

Sustainability Appraisal (SA) which assesses the social, economic and environmental impact of policies and objectives – the SA is undertaken for each stage of the Local Plan and is consulted as one of the key pieces of evidence. Any comments received as part of the consultation will help to identify gaps from the community.

12. EIA action plan

Please list all the equality objectives, actions and targets that result from this assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Outcome	Action	Officer Responsible	Completion date
Plan for everyone	RAG rating is taking a more detailed look at potential impacts of individual policies – working with the equality team. This will be used to identify where individual services areas need to undertake a more detailed full EIA.	Joseph Todd, Aaron Basi, Surinder Singh.	Ongoing until the submission / adoption –2022/2023.
Up to date consultation database	Consultation database to be kept updated including harder to reach groups, for each consultation in order to ensure all groups are notified about the emerging Local Plan and are able to participate and raise any concerns.	Joseph Todd, Aaron Basi, Fabian D’Costa	Ongoing as part of Local Plan consultation
The consultation responses are representative of the demographics of Leicester	Equality monitoring to be undertaken on the consultation and analysed to ensure that the consultation is representative. If any gaps	Joseph Todd, Aaron Basi, Fabian D’Costa	First review June 2020, updated February 2022.

Equality Outcome	Action	Officer Responsible	Completion date
and we have the views of people from across all protected characteristics.	are identified, steps will be taken to address this.		
Up to date datasets	To use up to date datasets for the profile of Leicester City in all subsequent EIAs in order to ensure the protected characteristic groups are not omitted.	Joseph Todd, Aaron Basi	Ongoing up until the Local Plan is adopted and for future reviews. First review August 2020

Human rights articles:

Part 1: The convention rights and freedoms

Article 2: Right to Life

Article 3: Right not to be tortured or treated in an inhuman or degrading way

Article 4: Right not to be subjected to slavery/forced labour

Article 5: Right to liberty and security

Article 6: Right to a fair trial

Article 7: No punishment without law

Article 8: Right to respect for private and family life

Article 9: Right to freedom of thought, conscience and religion

Article 10: Right to freedom of expression

Article 11: Right to freedom of assembly and association

Article 12: Right to marry

Article 14: Right not to be discriminated against

Part 2: First protocol

Article 1: Protection of property/peaceful enjoyment

Article 2: Right to education

Article 3: Right to free elections