

**City of York Council**  
**Equalities Impact Assessment**

**Who is submitting the proposal?**

<b>Directorate:</b>	City Development		
<b>Service Area:</b>	Strategic Planning Policy		
<b>Name of the proposal :</b>	Adoption of the City of York Local Plan		
<b>Lead officer:</b>	Alison Cooke Head of Strategic Planning Policy		
<b>Date assessment completed:</b>	8 February 2025		
<b>Names of those who contributed to the assessment:</b>			
<b>Name</b>	<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>
Alison Stockdale	Principal Strategic Planning Policy Officer	City of York Council	Strategic Planning Policy
Laura Williams	Assistant Director Customer, Communities and Inclusion	City of York Council	Customer, Communities and Inclusion
Cathryn Moore	Legal Business Partner (Corporate) & Deputy Monitoring Officer	City of York Council	Legal Matters

## Step 1 – Aims and intended outcomes

1.1	<b>What is the purpose of the proposal?</b> Please explain your proposal in Plain English avoiding acronyms and jargon.
	City of York Council submitted a Local Plan for public examination in May 2018. Following 6 years of examination by independent inspectors, their final report has been received. This recommends that the Local Plan satisfies the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 and meets the criteria for soundness as set out in the National Planning Policy Framework. The Plan is therefore capable of adoption. Full Council are asked to endorse the conclusions made by the inspectors and adopt the Local Plan as part of the Development Plan for the authority.
1.2	<b>Are there any external considerations?</b> (Legislation/government directive/codes of practice etc.)
	As a Local Planning Authority, we are required to prepare a Development Plan for the authority area planning for a period of 15 years hence in accordance with national legislation: <ul style="list-style-type: none"> <li>• Planning and Compulsory Purchase Act 2004 (as amended). Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 sets out that each local planning authority must identify their strategic priorities and have policies to address these in their Local Plan. The Local Plan is made up of these strategic policies and also non-strategic policies covering more detailed matters;</li> <li>• Localism Act 2011(as amended);</li> <li>• Town and Country Planning Regulations 2012 (as amended);</li> <li>• National Planning Policy Framework;</li> <li>• Partial Revocation Order for the Yorkshire and Humber RSS (2013);</li> <li>• Environmental Assessment of Plans and Programmes Regulations 2004 (as amended);</li> <li>• Conservation of Species and Habitats 2017 (as amended).</li> </ul>
1.3	<b>Who are the stakeholders and what are their interests?</b>
	<p><b>City of York Council:</b> The local authority is key stakeholder on the delivery of outcomes and engagement with its various communities and is committed to producing a Local Plan for the city. The Council has made commitments through the Council Plan to deliver on our equalities duty, suitable housing provision for all and reducing health inequalities for its residents, all of which are relevant to the wider community.</p> <p><b>Developers/ Planning agents:</b> Development professionals who may use the policy to influence development masterplans, where policies may be applicable.</p>

	<p><b>Landowners:</b> Those whose land may be allocated for development/protection and within the influence of the Plan's policy(ies).</p> <p><b>York's communities:</b> The Plan provides the framework for the ongoing development of the City. As such it identifies provision for housing and employment sites as well associated infrastructure, including greenspace, to support the needs of all our communities.</p>
<b>1.4</b>	<p><b>What results/outcomes do we want to achieve and for whom?</b> This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans.</p>
	<p>The plan was prepared in accordance with, and to support, previous Council Plans and corporate strategy. Whilst prepared and submitted ahead of the current Council Plan 'One City, for all' (2023), it supports the core commitments, as follows. Additionally, all of the core commitments align with and have been considered in the Sustainability Appraisal at each stage of plan production and consultation to inform the process:</p> <p><b>Equalities and Human Rights</b> Under the Equalities Act 2010, Gypsy, Roma and Traveller communities are specifically protected under the protected characteristic 'Race'. Planning policy requirements regarding the spatial delivery of Gypsy, Roma and Traveller provision must be evidence based and in accordance with Planning Policy for Travellers (2024) and the National Planning Policy Framework (2024). The Plan addresses the specific accommodation needs of Gypsies and Travellers by assessing accommodation needs over the Plan period, protecting and extending existing sites, enabling delivery of new sites and setting the policy within which applications for new sites would be assessed. The Plan also addresses the specific accommodation needs of Travelling Showpeople, bringing permanent consent to a temporary site and providing for the family's projected housing needs over the Plan period.</p> <p>The plan will meet housing needs and provide a range of house types. The LHNA 2022 provides relevant evidence for this, including the need for affordable housing. Delivery of new affordable homes offering a comfortable standard of living in sustainable locations with access to services will positively impact on those in the lowest income groups.</p> <p>Right to education - Policies related to the universities will help to ensure appropriate expansion of the institutions ensuring they continue to provide modern educational facilities for the city and wider community while protecting the interests of the local communities which can be impacted by such development.</p>

Right to respect for private and family life, home and correspondence - The Plan will meet housing needs and provide a range of house types for all ages, supported by the latest evidence in the Local Housing Needs Assessment (LHNA)(2022) and Gypsy and Traveller Accommodation Assessment (2022).

Right to not be subject to discrimination - Policies meet Gypsy, Traveller and travelling showpeople's accommodation needs, supporting the outcomes of the Gypsy and Traveller Accommodation Assessment (2022). Policies address the needs of those meeting the Planning Policy for Traveller Sites 2024's revised definition of Travellers.

### **Affordability**

A fundamental purpose of the Local Plan is to ensure we meet the development needs identified through the evidence base. A key aspect of this is the delivery of housing for the which the Local Plan has allocated over 13,000 new homes to be delivered in the plan period to 2032/33 but has planned to deliver 22,000 in total when all allocations are developed.

Central to the policy approach has been the need to ensure a viable approach to the delivery of market and affordable housing via development proposals as set out in Section 5 'Provide Good Quality Homes and Opportunities'. This has resulted in the inclusion of the following policies, all of which align to Council's objective for delivery of affordable and specialist accommodation to meet the needs of the population:

- Policy H1: Housing Allocations
- Policy H2: Density of residential development
- Policy H3: Balancing the Housing Market
- Policy H4: Promoting Self and Custom House Building
- Policy H5: Gypsies and Travellers
- Policy H6: Travelling Showpeople
- Policy H7: Student Housing
- Policy H8: Houses in Multiple Occupation.
- Policy H9: Older Persons specialist accommodation
- Policy H10: Affordable Housing.

### **Climate**

Climate change is specifically referenced in the vision for the plan and considered throughout the policy approach as part of embedding sustainable development.

Section 11 'Climate Change' includes specialist policies to manage climate change mitigation and adaption through the planning application and decision-making process. These are:

- CC1: Renewable and Low Carbon energy Generation and Storage
- CC2: Sustainable Design and Construction of New development
- CC3: Decentralised Energy Networks.

### **Health**

The Plan embeds supporting positive social outcomes through plan, including for health and wellbeing. Section 6 'Health and Wellbeing' directly supports the achievement healthy lifestyles and the necessary physical infrastructure for health. Additionally, other sections in the plan support health and wellbeing through the inclusion of Green Infrastructure, requirement for placemaking and design, provision of new and specialist accommodation, sustainable transport delivery and maintaining environmental quality and flood risk.

## Step 2 – Gathering the information and feedback

2.1	<b>What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights?</b> Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.
Source of data/ supporting evidence	Reason for using
Previous EIA	<p>EIA has been undertaken throughout the Local Plan making process to help to ensure that the impacts of the Plan on equalities and human rights are fully understood.</p> <p>EIA has been undertaken at the following points:</p> <ul style="list-style-type: none"> <li>• <a href="#">CD019</a> City of York Local Plan EqIA (incorporating the better decision making tool) (2018)</li> <li>• <a href="#">SD027c</a> – Executive 13 July 2017 Annexes – See Annex 11: Better Decision Making Tool. This supports <a href="#">SD027a</a> (Executive Minutes) and <a href="#">SD027b</a> (Executive Report) wherein the decision was taken to proceed to Pre-Publication (Regulation 18) consultation.</li> <li>• <a href="#">SD028c</a> -Executive 25th January 2018 Annexes – See Annex C: Better Decision Making Tool. This supports <a href="#">SD028a</a> (Executive Minutes) and <a href="#">SD028b</a> (Executive Report) wherein the decision was taken to proceed to Publication (Regulation 19) consultation.</li> <li>• This has been updated with addendum EIAs in <a href="#">March 2019</a>, <a href="#">January 2023</a> and <a href="#">July 2024</a> completed to support consultations on main modifications to the Plan.</li> </ul>
Primary consultation	<p>There has been extensive consultation in both the preparation of the plan (2012-2018) and during the Examination process (2018-2025). This is summarised below:</p> <p><u>2012-2018: Pre-Submission</u></p> <ul style="list-style-type: none"> <li>• Issues and Options 2 (2011) (as part of the halted Core Strategy)</li> <li>• 'Call for sites' (2012) requesting land to be submitted for consideration for development</li> <li>• Preferred Options (2013)</li> <li>• Further Sites Consultation (2014)</li> <li>• Preferred Approach and evidence base consultation (2016)</li> <li>• Pre-submission (Regulation 18) consultation (2017)</li> </ul>

	<ul style="list-style-type: none"> <li>• Publication (Regulation 19) consultation (2018)</li> </ul> <p><u>2018-2025: Post Submission</u></p> <ul style="list-style-type: none"> <li>• Proposed modifications consultation between June to July 2019</li> <li>• Proposed modifications and Evidence Base consultation between May to June 2021</li> <li>• Proposed Main Modifications consultation between February to March 2023</li> <li>• Proposed Main Modifications consultation pertaining to Policy H5 'Gypsies and Travellers' between July to September 2024</li> </ul> <p>Consultation has been undertaken in accordance with the adopted statutory Statement of Community Involvement<sup>1</sup>, which sets out our approach to engagement in planning services. Consultation has also taken place in accordance the Town and Country Planning Regulations, predominantly Regulations 18 and 19, which dictate how consultation should be undertaken at each preparatory stage of the process.</p> <p>Further consultation has been undertaken by the Programme Officer on behalf of the Local Plan Inspectors on more focussed matters. This includes, for example, consultation on Green Belt Amendments proposed by the Inspectors in August 2023, for which the Council prepared consultation materials but the process of consultation was performed by the Programme Officer.</p> <p>Additionally, the Inspectors have held five phases of in-person Hearing Sessions between 2019-2024 prior to which there has been an invitation to comment on the Matters, Issues and Questions outlined by the Inspectors. As part of this, respondents were invited to state whether they would like to attend the hearing sessions in person. The process of attendance, coordination and delivery of the Hearing Sessions was undertaken by the Programme Officer, in conjunction where necessary with Council Officers. All details of the sessions were published online and held in accessible venues in York, with a public viewing gallery for those wishing to observe the proceedings but not actively participating in the discussion.</p>
<p>Evidence</p> <p>Core Document Library, evidencing the submitted Local Plan (2018)</p>	<p>This contains the documents, plans, strategies and evidence (including consultation) that informed the submitted Local Plan.</p> <p><a href="https://www.york.gov.uk/downloads/download/420/local-plan-submission-documents-1">https://www.york.gov.uk/downloads/download/420/local-plan-submission-documents-1</a></p> <p><a href="https://www.york.gov.uk/downloads/download/896/local-plan-submission-documents-2">https://www.york.gov.uk/downloads/download/896/local-plan-submission-documents-2</a></p>

<sup>1</sup> Core Document CD0016: City of York Statement of Community Involvement (SCI) (Adopted December 2007) <https://www.york.gov.uk/downloads/file/1388/cd016-city-of-york-statement-of-community-involvement-sci-adopted-december-2007->

Evidence  Local Plan Examination Library	This contains the documents, statements and other relevant correspondence issued after the submission of the City of York Local Plan to the Secretary of State on 25 May 2018. This library is updated by all material issued by the Inspector, City of York Council and other parties throughout the examination process. This includes updated evidence, Hearing Statements (from the Council and other stakeholders) and letters, queries and other matters issued from the Inspectors'. <a href="https://www.york.gov.uk/LocalPlanExaminationLibrary">https://www.york.gov.uk/LocalPlanExaminationLibrary</a>
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### Step 3 – Gaps in data and knowledge

<b>3.1</b>	<b>What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.</b>	
	<b>Gaps in data or knowledge</b>	<b>Action to deal with this</b>
	N/A – there has been extensive EIA undertaken already on the Local Plan as identified within this document.	



## Step 4 – Analysing the impacts or effects.

<b>4.1</b>	<b>Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments?</b> Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
<b>Equality Groups and Human Rights.</b>	<b>Key Findings/Impacts</b>	<b>Positive (+) Negative (-) Neutral (0)</b>	<b>High (H) Medium (M) Low (L)</b>
<b>Age</b>	Policies in the Plan seek to provide a mix of housing, including specific policy for older persons housing, to support inclusive communities.	<b>+</b>	<b>M</b>
<b>Disability</b>	Policies in the Plan address issues around providing safe and suitable access to development for all including those with impaired mobility. They also support the provision of housing which is flexible to accommodate changing circumstances and delivery of housing to the higher access standards of Part M Building Regulations.	<b>+</b>	<b>M</b>
<b>Gender</b>	This proposal is not expected to impact on that characteristic	<b>-</b>	
<b>Gender Reassignment</b>	This proposal is not expected to impact on that characteristic	<b>-</b>	
<b>Marriage and civil partnership</b>	This proposal is not expected to impact on that characteristic	<b>-</b>	
<b>Pregnancy and maternity</b>	This proposal is not expected to impact on that characteristic	<b>-</b>	

<b>Race</b>	Policies in the Plan specifically address accommodation needs for Gypsies and Travellers. This should have significant positive outcomes against this characteristic.	<b>+</b>	<b>H</b>
<b>Religion and belief</b>	This proposal is not expected to impact on that characteristic	<b>-</b>	
<b>Sexual orientation</b>	This proposal is not expected to impact on that characteristic	<b>-</b>	
<b>Other Socio-economic groups including :</b>	<b>Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?</b>		
<b>Carer</b>	This proposal is not expected to impact on that characteristic	<b>-</b>	
<b>Low income groups</b>	Policy H10 addresses the requirements for affordable housing within new development to address the affordability issues around housing in the city.	<b>+</b>	<b>H</b>
<b>Veterans, Armed Forces Community</b>	Policy H10 addresses the requirements for affordable housing within new development to address the affordability issues around housing in the city. This will positively impact service leavers who often struggle to find suitable housing after their service.	<b>+</b>	
<b>Other</b>	This proposal is not expected to impact on that characteristic	<b>-</b>	
<b>Impact on human rights:</b>			
List any human rights impacted.	<p><b>Right to education</b> – the Plan makes provision, where justified by need and capacity, for new schools on strategic sites; it also supports expansion of the universities.</p> <p><b>Right to respect for private and family life, home and correspondence</b> – the Plan meets housing needs identified in the latest evidence base (including those of Gypsies and Travellers) and provides a range of house types for all ages.</p>	<b>+</b>	<b>M</b>

	<b>Right to not be subject to discrimination</b> – Policies meet Gypsy & Traveller, and Travelling Showpeople’s needs supported by the latest Gypsy and Traveller Accommodation Assessment.		
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## Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a **POSITIVE** impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a **NEGATIVE** impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a **NEUTRAL** effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<b>High impact</b> (The proposal or process is very equality relevant)	There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.
<b>Medium impact</b> (The proposal or process is somewhat equality relevant)	There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights
<b>Low impact</b> (The proposal or process might be equality relevant)	There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights

## Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	<b>Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?</b>
<p>There are no adverse impacts identified with adoption of the Local Plan in relation to equalities.</p> <p>Positive impacts have been identified in the provision of an inclusive mix of housing, both market and affordable. In particular, the provision of Gypsy and Traveller pitches will be advised by significant engagement with the community as required by policy H5: Gypsies and Travellers.</p>	

## Step 6 – Recommendations and conclusions of the assessment

6.1	<b>Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:</b>
<p><b>No major change to the proposal</b> – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.</p>	

<ul style="list-style-type: none"> <li>- <b>Adjust the proposal</b> – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.</li> <li>- <b>Continue with the proposal</b> (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty</li> <li>- <b>Stop and remove the proposal</b> – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.</li> </ul> <p><b>Important:</b> If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.</p>	
<b>Option selected</b>	<b>Conclusions/justification</b>
<b>No major change of the proposal</b>	The EIA demonstrates that the adoption of the Local Plan will result in positive impacts, particularly in relation to housing. Policies in the Plan address the need for a wide range of housing, market and affordable, for a range of groups.

## Step 7 – Summary of agreed actions resulting from the assessment

7.1	What action, by whom, will be undertaken as a result of the impact assessment.		
Impact/issue	Action to be taken	Person responsible	Timescale
Local Plan review	Work will begin in due course on scoping the extent of a review of the Local Plan reflecting current national planning policy	Alison Cooke, Head of Strategic Planning Policy	2025/26

## Step 8 - Monitor, review and improve

8. 1	<b>How will the impact of your proposal be monitored and improved upon going forward?</b> Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?
	Monitoring of planning policies is a statutory duty to check that these are having their intended effect and to make sure they are working for local communities. The Local Plan policies will be monitored in accordance with an agreed monitoring framework and reported through the statutory Authority Monitoring Report on an annual basis.