

Equality Impact Assessment

Publication Draft Local Plan (May 2019)

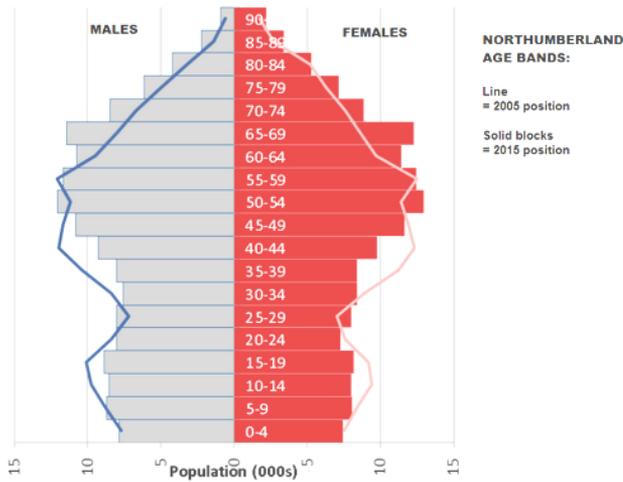
1. Introduction

- 1.1 The Northumberland National Park Authority (NNPA) is currently preparing a new Local Plan for the period 2017-2037, replacing the current Core Strategy and Development Policies adopted in March 2009. The Local Plan contains policies, proposals and supporting text that sets out what type of development is and isn't acceptable in the National Park. It also sets out a vision for the Park and a strategy to achieve this through planning decisions over a specific period of time.
- 1.2 The NNPA has a statutory duty to consider equalities when exercising their functions. There are three main duties set out in the Equality Act 2010:
 - To eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act.
 - To advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it.
 - To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 1.3 The NNPA has undertaken this Equalities Impact Assessment which determines the potential impacts of policies, within the Publication Draft version of the Local Plan, on different characteristics. This Equalities Impact Assessment, in line with the Equality Act 2010, identifies nine characteristics to be protected from discrimination, which are:
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation

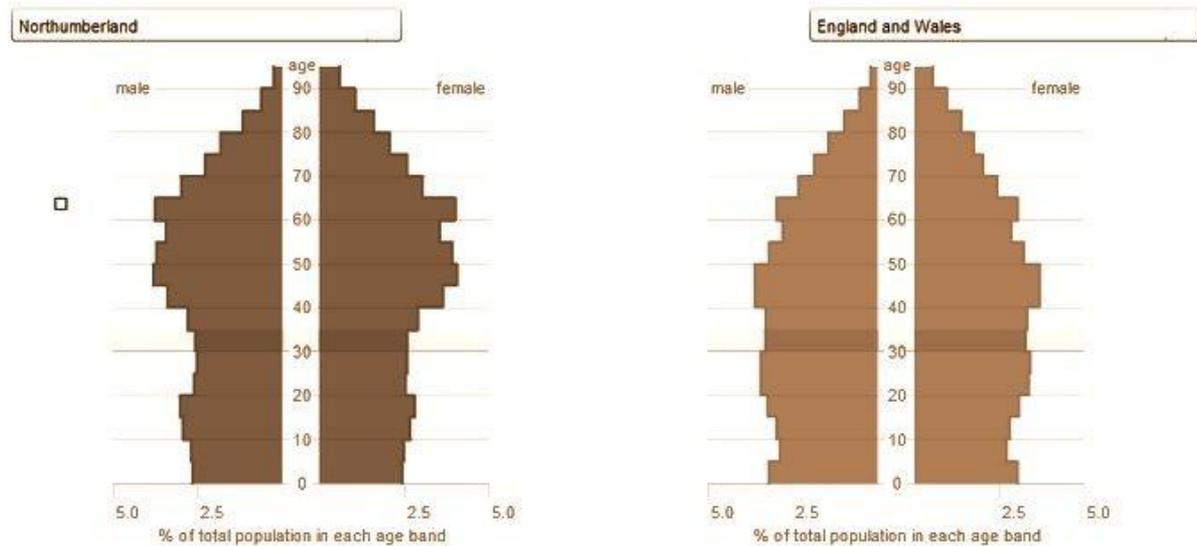
2. Baseline Information

Age

- 2.1 The population of Northumberland is an ageing one, as illustrated in the comparative diagram below (based on the 2015 mid-year estimates). It shows how a ten year period has seen the top-heaviness of the 'age pyramid', already clearly apparent in 2005, increase markedly, with the largest increase being in the 60 to 64 year old cohort.



- 2.2 The two diagrams below compare Northumberland with the England and Wales position, as at the 2011 Census, demonstrating that the nation as a whole has a much higher representation of the younger age cohorts.



- 2.3 These show that in Northumberland, planning needs to cater for a greater proportion of older age groups than on average around the country. Indeed, projections from 2012 to 2031 show that the over 65 age group will increase by 52.6%, the 70 to 79 age group by 48.8% and the 80-89 age group also increasing significantly.

- 2.4 The Publication Draft Local Plan determines where development should go in the future. It has to be a plan that seeks to sustain the economy, the environment and communities. As

such, it could affect how people are able to access, homes, jobs, services and other important aspects such as the countryside and recreation. The Plan seeks to locate new homes sustainably in relation to services; jobs and public transport and avoid areas of greater risk. It must also consider specialist needs of the population – how and where these could best be provided.

- 2.5 In terms of age, the Publication Draft includes Strategic Priority 4 that '*encourages more working age people and families to live in the National Park or one of its gateway settlements*'. The Strategic Priorities seek to attract and retain working age people, through building sufficient homes and attracting sufficient jobs. While the Publication Draft looks to achieve an age structure that more closely resembles the right hand of the two pyramids above, this in itself will not disadvantage the older age groups. Indeed the presence of younger households and workforce should help bolster services that older age groups rely on.
- 2.6 In overall terms, the Publication Draft values the contribution that older age groups make towards the economy and society and seeks to plan positively for this element of the population, as well as the younger elements.
- 2.7 How and where new development is planned affects overall levels of accessibility for people. In terms of older age groups, proximity to services, such as healthcare, is especially important and/or the means to access these by public transport. Accessing quality jobs is a key issue for younger people. Again, public transport can be a lifeline for young people wishing to access work.
- 2.8 Provision of appropriate accommodation in the right locations to meet needs is vital and this tends to be magnified as an issue for either end of the age spectrum. For the older age groups, the suitable provision and location of lifetime homes, retirement, sheltered housing and/or extra care housing are important. At the younger end of the age range, affordable housing can be the key to enabling people to live independently from family.
- 2.9 An additional factor for older people is that any homes built in unsuitable locations such as isolated places or areas of flood risk can form a greater risk for these age groups than is the case for younger people, who are less likely to be disabled, for example.

Disability

Note: "disabled people" includes people with physical, learning and sensory disabilities, people with a long-term illness, and people with mental health problems.

- 2.10 There were 16,200 residents receiving disability living allowance (DLA) in Northumberland as at May 2016. In the 16-64 age group, 36% were disabled which was similar to the national figure of 35.7%. However, those receiving DLA probably only represent about a quarter of the numbers who regard themselves as having some form of disability.
- 2.11 The table below shows that Northumberland sits more closely with the national, rather than the regional picture with regard to percentage disabled based on the Equality Act definition. Even so, this accounts for more than one in five people.

Disability amongst people aged 16-64 (Oct 2011- Sept 2012)

(Based on the Equality Act definition)	Northumberland	North East	England
% disabled	11.7	14.1	11.7
% work-limiting disabled	3.8	4.2	3.6
% both work-limiting disabled and disabled	20.5	24.0	20.4

Source: ONS Neighbourhood Statistics Local Authority profiles

- 2.12 The Publication Draft is a plan for where development should go in the future. It has to be a plan that seeks to sustain the economy, the environment and communities. As such, it could affect how people are able to access, homes, jobs, services and other important aspects such as the countryside and recreation. The Plan seeks to locate new homes sustainably in relation to services, jobs and public transport and avoid areas of greater risk. It must also consider specialist needs of the population – how and where these could best be provided.
- 2.13 For disabled people, isolation from services and/or ways of accessing services and work are barriers, as is a lack of opportunity to access specialist housing where this is needed. Homes built in unsuitable locations such as isolated places or areas of flood risk can form a greater risk for disabled people than for other people.

Gender Reassignment

Note: The Act provides protection for transgender people. A transgender person is someone who proposes to, starts or has completed a process to change his or her gender.

- 2.14 There is no information on the numbers of this protected characteristic in Northumberland, nor on whether proportions are different from the national average.
- 2.15 There is nothing to suggest that this protected characteristic would be affected any differently than the population in general as a result of the Plan. However, comments collected from representatives of LGBT suggest that perceptions of isolation in rural areas may be stronger for minority groups such as this one.
- 2.16 Known barriers for these groups include perceptions of isolation in rural areas, which may be stronger for minority groups such as this, a higher likelihood of hate crime in these areas, along with poorer support networks, especially for older people with this characteristic.

Marriage and Civil Partnership

- 2.17 Married or same-sex civil partnership couples make up 37% of Northumberland households, with 10% housing cohabiting couples (2011 Census, ONS). There was a 9% decrease in the number of marriages from 2010 to 2011. It is unknown how these figures have changed more recently at county level but the proportion of the population at national level who were married has remained consistent at 51% from 2010 through to 2017.
- 2.18 In the National Park, the number of married couples is anticipated to be less due to the lower numbers of residents aged in their 20s and 30s with more children and older people (with high numbers of divorcees and widowers in these age brackets) bringing the proportion down. Challenges include providing suitable and affordable housing with proximity to facilities and employment to support married and civil partnership couples.

Pregnancy and Maternity

Note: the law covers pregnant women or those who have given birth within the last 26 weeks, and those who are breast feeding.

- 2.19 At any given time, a significant minority of the population will be pregnant and/or looking after young children. They will have special needs relating to childcare which will have implications for how the environment is planned. Examples would be finding affordable living accommodation for single parents, which may be more of a barrier than for some other people in affordable housing need. Accessing vital childcare facilities poses difficulties in more isolated rural areas. These are issues which are relevant and within the scope of the Publication Draft Local Plan to address.

Race

Note: For the purposes of the Act 'race' can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. For example, you may have Chinese national origins and be living in Britain with a British passport.

- 2.20 According to censuses, the proportion of people who described themselves as not being 'White British' has been very low in Northumberland compared with many parts of the country. However it is showing a marked increase – up from 1.9% in 2001 to 2.8% in 2011 and it can be assumed that the upward trend in ethnic minority groups will continue. Furthermore, they are concentrated, in many cases, in certain areas. It is important that the Local Plan plans for the particular spatial needs generated by ethnic minority groups.
- 2.21 There are difficulties that people from ethnic minority backgrounds face in accessing affordable housing and certain services due to barriers such as language. In addition, migrants are often trapped in low paid jobs. The Local Plan seeks to improve access to quality jobs, homes and services generally for the population and there may be the opportunity to influence access for ethnic minority groups – at least indirectly.
- 2.22 One particular group – Gypsies, Roma and Travellers (GRT) – is known to be undercounted in official censuses due in part to their nomadic lifestyle. Perhaps, of all the ethnic minority groups, GRT have the most specialist needs in terms of planning spatially for their needs (accommodation / services / work). Evidence shows that GRT face barriers in accessing mainstream services including accommodation, health and education.
- 2.23 Notwithstanding the above commitments, further barriers to accommodation provision can be identified as follows:
- In terms of the types of specialist accommodation that may be required, communities can oppose sites being in their local area due to perceptions about matters such as loss of amenity.
 - It is not possible for such sites to be located in the Green Belt. Since it is likely that sites would be outside built-up areas, this effectively precludes them from being located in a sizeable part of the County.
- 2.24 The NNPA will seek to find a sustainable solution or solutions in consultation with the GRT and settled communities. It is not considered that the settlement hierarchy or other policies impose a restriction on accommodation that is any greater than the restrictions faced by the wider population.

Religion or Belief

- 2.25 Of those who stated that they had a religion in the 2011 Census, less than 2% followed religions other than Christianity. Nonetheless, it is recognised that particular religions will have particular requirements and this may include identifying land for places of worship.
- 2.26 A comparison between the 2001 and 2011 Censuses in Northumberland shows some changes in the minority religions, as well as a reduction in those stating a Christian belief. These changes could have implications for the requirement for different types of places of worship.

	2001		2011		Change	
	Number	%	Number	%	Number	%
Christian	249,029	81.1	216,673	68.6	-32,356	-12.5
Buddhist	352	0.1	578	0.2	226	0.1
Hindu	258	0.1	335	0.1	77	0.0
Jewish	129	0.0	169	0.1	40	0.1
Muslim	663	0.2	1,018	0.3	355	0.1
Sikh	385	0.1	494	0.2	109	0.1
Other religion	596	0.2	980	0.3	384	0.1
No religion	36,156	11.8	75,620	23.9	39,464	12.1
Religion not stated	19,622	6.4	20,161	6.4	539	0.0

Source: 2011 and 2001 Census (KS201EW & KS06), Office for National Statistics.

- 2.27 A barrier that may be faced by people from particular religions is accessing suitable places of worship, which may have particular requirements in terms of location and land. The Local Plan could determine the future location of community facility development and therefore influence the opportunities for religious groups to practice their religions.

Sex

- 2.28 The table shows the 2015 mid-year estimates for the distribution of the population between male and female and it can be seen that the ratio of female to male is higher in Northumberland than the North-East, which is in turn higher than England as a whole. This is largely explained by the older age profile, given that the life expectancy for females is greater than for males.

Area	Total Population	Male		Female	
		Number	%	Number	%
Northumberland	315,263	153,914	48.8%	161,349	51.2%
North-East	2,624,621	1,287,177	49.0%	1,337,444	51.0%
England	54,786,327	27,029,286	49.3%	27,757,041	50.7%

- 2.29 In terms of gender issues, the pattern of development can be a factor. The lives of older women are often very different from those of older men. On average, women live longer but have lower incomes and are more likely to be disabled. Women have different working patterns to men. Traditionally, women have also left the labour market earlier, though this is likely to change over time. Those in work may be more likely than men to have two part-time jobs rather than one full-time job. There is also a lower likelihood that women will have 24

hour access to a car. The need for access to public transport, proximity to workplaces and the avoidance of isolated locations are factors to consider in planning for the needs of women.

- 2.30 Because women are also often younger than their partners, more women than men live alone in their later years. These factors will also impact on how the Local Plan needs to have regard for other protected characteristics (Age and Disability).

Sexual Orientation

Note: The Act protects bisexual, gay, heterosexual and lesbian people.

- 2.31 The Government estimates that 6% of the population is lesbian, gay or bisexual (LGB). There are no statistics to suggest that proportions are likely to be significantly different in Northumberland than elsewhere.
- 2.32 Known barriers for these groups include perceptions of isolation in rural areas, which may be stronger for minority groups such as LGB, a higher likelihood of hate crime in these areas, along with poorer support networks, especially for older people with this characteristic.

3. Assessment Method

3.1 Each policy of the Publication Draft Local Plan has been reviewed against the three main duties set out in the Equality Act 2010:

- To eliminate discrimination, harassment, victimisation and other conduct that is prohibited under the Act.
- To advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it.
- To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

3.2 The table below shows how the impacts of each Policy has been assessed for each of the protected characteristics.

Colour	Impact
Green	Positive
Grey	Neutral
Red	Negative

3.3 A matrix below shows the full assessment of potential Equalities impacts. Those with a positive or negative impact have been referred to in further detail following the matrix.

5. Equalities Impact Assessment - Positive or Negative Impacts

Age

ST2 – General Development Principles

- 5.1 There is a potential positive impact for people of all ages due to the following criteria: 1b) “reduces the need to travel”, 1h) “improves public access”, 2a) “the health and/or well-being of local communities” and 2e) “access to local services and community facilities”.

DM3 – Affordable Housing

- 5.2 Criterion 6: for “those in need of affordable housing who also have a local connection” has a potential positive impact for people of all ages as it will support existing family networks.

DM6 – Conversion of Buildings

- 5.3 This policy direction has changed to allow conversion into residential use subject to certain criteria. This could have a positive impact as it has the potential to create more suitable homes for people of all ages.

DM7 – Rural Economy and Diversification

- 5.4 Criteria 1b) “provides opportunities for the operation of home-based businesses” and 1d) “the provision of small, flexible, start-up businesses or incubator uses” could have a positive impact as it may be beneficial to those with young children who need to work flexibly or young adults to stay in the area.

DM9 – Tourism and Recreation

- 5.5 This policy in 1b) seeks for people of all ages to “increase their awareness, understanding and enjoyment of the special qualities of the National Park”.

Disability

ST2 – General Development Principles

- 5.6 There is a potential positive impact for people with a disability, or those caring for someone with a disability, due to the following criteria: 1b) “reduces the need to travel”, 1h) “improves public access”, 2a) “the health and/or well-being of local communities” and 2e) “access to local services and community facilities”.

ST4 – Spatial Strategy

- 5.7 This policy direction focuses development of housing and new facilities in the settlements of local centres and smaller villages which will enable people with Disability to access existing services, particularly those with mobility issues, on low income or unable to travel long distances frequently.

DM1 – Community Infrastructure and Facilities

- 5.8 Criteria 1) of the policy: “an unacceptable adverse impact on a community facility will not be permitted” ensures that these are retained both for those who need close access to services and for the health, social and mental wellbeing of residents able to engage with the rest of the community at these facilities.

DM3 – Affordable Housing

- 5.9 The policy direction to allow Affordable Housing on exceptions sites has the potential to give more housing opportunities to those with a disability or care for someone with a disability to find appropriate housing if they require Affordable Housing.

Marriage and Civil Partnership

DM3 – Affordable Housing

- 5.10 The policy direction to allow Affordable Housing on exceptions sites has the potential to give more housing opportunities to married couples and those in a civil partnership that may otherwise be unable to afford a home within the National Park, should they meet the requirements for Affordable Housing.

Pregnancy and Maternity

DM1 – Community Infrastructure and Facilities

- 5.11 Criteria 1) of the policy: “an unacceptable adverse impact on a community facility will not be permitted” ensures that these are retained for the benefit of those who are pregnant or on maternity who need close access to services and for the health, social and mental wellbeing of those residents by being able to engage with community groups at these facilities.

Race

ST5 – New Housing

- 5.12 This policy has changed meaning; although Principal Residency in the property is required, new houses are no longer restricted to those with a local connection. This could potentially benefit those of different races and from outside of the local area to live in the National Park.

DM5 – Accommodation for Gypsies, Roma and Travellers

- 5.13 The policy has potential benefit for these specific people by ensuring there is adequate infrastructure and facilities in order to suitably accommodate them within the National Park.

Religion or Belief

DM1 – Community Infrastructure and Facilities

- 5.14 As places of worship are considered community facilities, criteria 1) of the policy: “an unacceptable adverse impact on a community facility will not be permitted” ensures that places of worship are protected which benefits those which practice that faith.

Neutral Impacts

- 5.15 Unless mentioned above, all other policies mentioned are considered to have a neutral impact on the nine characteristics: Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, and Sexual Orientation. In such cases, the Publication Draft Local Plan policy does not include any direct or indirect references to any of the groups and the policy is not considered to have a direct impact (positive/ negative/ neutral) on this protected characteristic.

6. Conclusion

- 6.1 Overall based on the matrix, the Publication Draft Local Plan can be considered to have an overall positive impact on six of the nine characteristics: Age, Disability, Marriage and Civil Partnership, Race, and Religion or Belief. The Publication Draft Local Plan can be deemed to have a neutral impact on three of the characteristics: Gender Reassignment, Sex, and Sexual Orientation. The Publication Draft Local Plan is considered to be compatible with the three main duties of the Equality Act 2010.

Consultation

- 6.2 In addition to the content of the Local Plan, equalities for the protected characteristics are taken into consideration when consulting on the different stages of the Local Plan. This is typically done by the selection of a varied range of suitable venues inside and outside the National Park. Text of all the Local Plan documents are available in hard copy and in large print on request. Helpful documentation such as "What is a Local Plan?" and an FAQs sheet were also produced for the consultation. Two special youth consultation events were also held to ensure a broad range of ages were able to express their views on the Local Plan.