

Equalities Impact Assessment of the Horsham District Local Plan, January 2024 (Extract of Sustainability Appraisal - Appendix C)

- C.1 This report presents the findings of an assessment of the likely effects on equalities issues of the Regulation 19 Horsham District Local Plan 2023.
- C.2 The requirement to undertake formal Equalities Impact Assessment (EqIA) of plans was introduced in the Equality Act 2010 but was abolished in 2012 as part of a Government bid to reduce bureaucracy. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.
- C.3 In fulfilling this duty, it is useful to produce a written record documenting how equalities issues having been specifically considered and that is the purpose of this report.
- C.4 The Equality Act 2010 identifies nine '*protected characteristics*' and seeks to protect people from discrimination on the basis of these. They are:
1. Age
 2. Disability
 3. Gender reassignment
 4. Marriage and civil partnership
 5. Pregnancy and maternity
 6. Race
 7. Religion or belief
 8. Sex
 9. Sexual orientation
- C.5 There are three main duties set out in the Equality Act 2010¹²³, which public authorities including Horsham District Council must meet in exercising their functions:
- To eliminate discrimination, harassment, victimisation and other conduct that is prohibited.
 - 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.

¹²³ Section 149(1) of the Equality Act 2010 .

The Regulation 19 Horsham District Local Plan

- C.6 The Regulation 19 Horsham District Local Plan (January 2024), sets out a vision and objectives for Horsham District together with 46 land use policies and 21 policies allocating large scale and small-scale site for development.
- C.7 The purpose of the Horsham District Local Plan is to guide development up to 2040. Because strategic planning is only one function of Horsham District Council, it is not expected that the Local Plan alone would address all of the duties of the Equalities Act.

Baseline Information

- C.8 The Regulation 19 Draft Horsham Local Plan (January 2024) and accompanying SA/SEA Report, set out baseline information about Horsham District, including some information relevant to the protected characteristics covered by the Equalities Act. The most relevant information is summarised below.
- The population of Horsham in mid-2021 was 147,487 compared to the 2011 Census, when 131,301 people lived in the District, across 54,900 households. The population is split between 75,471 females and 72,016 males¹²⁴.
 - Of the population in Horsham, 93.6% are white. The remaining population is split between a number of ethnic minority groups, including Asian (2.7%) Black (0.9%) and a further 2.1% from mixed or multiple ethnic groups.
 - 51.8% of Horsham's total population are religious. The majority are Christian (49.3%), Muslim (0.9%), Buddhist (0.4%), Hindu (0.6%) and Jewish (0.2%). Sikh (0.1%), and other religions (0.4%). As such, 34.8% of the population stated they have no religion (26.9%) or did not state a religion at all (7.95).¹²⁵
 - According to 2021 estimates, 59.4% of the population is aged between 16 and 64. From the recent estimates available of the population that is aged 16 and over, 29.6% are single, 52.5% are married of those 0.4% are living in a same-sex couple (married or in a civil partnership). A further 1.9% are separated but are still legally married or in a same-sex civil partnership). The remaining 16% are either divorced, widowed, or formerly in a same-sex civil partnership.¹²⁶
 - Horsham has an older age profile in comparison to England, with 22.8% of the population ages 65 years and over. The average age in Horsham according to Census

¹²⁴ ONS (2021) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland: Mid-2021 [Online] Available: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesScotlandandNorthernIreland>

¹²⁵ ONS (2021) Horsham [Online] Available: <https://www.ons.gov.uk/census/maps/choropleth/identity?Itla=E07000227&lad=E07000227>

¹²⁶ ONS (2021) Horsham Available [Online] <https://www.ons.gov.uk/census/maps/choropleth/population?Itla=E07000227&lad=E07000227>

2021 data is 45 years³.

- The 2021 Census statistics suggest that health in the District is reasonably good with 86.5% of the population reporting themselves to be in very good, or good health. Some 10.2% state they are in fair health, with only 2.5% and 0.7% in bad or very bad health respectively. The health of the District has improved since the 2018 estimates.¹²⁷
- Horsham's Health Index score increased in 2021. Horsham has an overall Health Index score of 121.9, which is up 4.2 points compared with the previous year. A score of 100 represents average levels of health in England in 2015. A higher number always means better health and a lower number means worse health. Horsham ranked in the top 10 percent of local authority areas in England for health in 2021.¹²⁸
- In 2021, 5.0% of Horsham residents were identified as being disabled and limited a lot. This figure decreased from 5.8% in 2011¹²⁹. In 2021, just over 1 in 11 people (9.1%) were identified as being disabled and limited a little, compared with 8.6% in 2011. The proportion of Horsham residents who were not disabled increased from 85.6% to 85.9%. The decrease in the proportion of residents who were identified as being disabled and limited a lot in Horsham (0.8 percentage points) was similar to the decrease across the South East (1.0 percentage points, from 7.2% to 6.2%). Across England, the proportion fell by 1.6 percentage points, from 9.1% to 7.5%.
- According to the 2021 Census Data 91.1% of the population in the Horsham District are economically active. This compares with 78.8% in the whole of Great Britain. 94.4% of males are economically active in the Horsham District compared to 87.9% of females. This compares to 82.0% and 79.4% respectively for the rest of the UK¹³⁰.
- When considering all Indices of Deprivation (2019), the District of Horsham is ranked 290th out of 317 local authority areas where 1 is the most deprived. This position has fallen from 299 in 2015 and 304 in 2010.¹³¹
- In Horsham in 2018 it was estimated that 7.2% of households (4,258) were classed as being fuel poor. This is lower than the figure for West Sussex at this time which was 7.6%¹³². These figures are reflective of household income, household energy requirements and fuel prices in a given area.
- There is little baseline information available that is directly relevant to other protected characteristics including gender reassignment, or sexual orientation other than what is referenced above.

¹²⁷ ONE (2021) Horsham Available [Online] <https://www.ons.gov.uk/census/maps/choropleth/health/general-health-age-standardised/health-in-general/very-bad-health?lta=E07000227&lad=E07000227>

¹²⁸

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandwellbeing/articles/howhealthhaschangedinyourarea2015to2021/2023-06-16#E07000227>

¹²⁹ These are age-standardised proportions. Age standardised proportions are used throughout this section. They enable comparisons between populations over time and across geographies, as they account for differences in the population size and age structure.

¹³⁰ NOMIS – Local Area Report (2011) – Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx>

¹³¹ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

¹³² <https://lginform.local.gov.uk/reports/lgastandard?mod-area=E07000227&mod-group=E10000032&mod-metric=2131&mod-type=namedComparisonGroup&mod-period=1&mod-groupType=area>

Method

- C.9 The Regulation 19 Horsham District Local Plan has been reviewed to consider the likely impacts of the 46 land use policies and 21 site allocation policies on each of the *nine protected characteristics* from the Equality Act 2010 listed above. For each protected characteristic, consideration has been given to whether the options considered for inclusion in the Local Plan are compatible or incompatible with the *three main duties* of the Equality Act 2010.
- C.10 A colour coded scoring system has been used to show the effects that the Local Plan is likely to have on each protected characteristic, as shown below.

Score	Likely Effect
+	Positive
0/?	Neutral or unknown
-	Negative

- C.11 Note that the criteria applied to the appraisal of site options as part of the EqIA differs from the criteria applied to the appraisal of sites as part of the Sustainability Appraisal in the main SA Report. As such the effects identified cannot be compared between the two assessments.
- C.12 The purpose of this assessment is to ensure that the local plan policies are providing equality of opportunity and eliminating unlawful discrimination for everyone. The Council takes account of the needs, circumstances and experiences of those in the community who it intend to benefit from a policy.

Findings

- C.13 The detailed findings of the EqIA for the 46 land use policies are presented in Table 1 overleaf, while Table 2 presents the findings of the EqIA on the 21 site allocation policies. All policies have been shown to have either a positive, mixed or neutral effect in relation to all of the protected characteristics considered in this assessment. The document is therefore considered to be generally compatible with the three main duties of the Equality Act 2010.

Findings for the policies in the Local Plan

- C.14 Policies which seek to address the provision of community services and facilities in the District, seek to support development that enhances community access to these facilities, or prevent development that would limit access to these facilities (Policies 2, 3, 4, 5, 11, 12, 14, 15, 19, 20, 27, 28, 35, HA1 and 41) are all expected to result in a positive effect in relation to the protected characteristics of **pregnancy and maternity, sexual orientation and religion or belief**. These policies are likely to contribute to the development of, and convenient access to, community facilities that could support meetings related to the LGBTQ+ community, pregnancy or maternity and faith groups in the District.
- C.15 Policies 2 and 3 support development at locations with a good range of services and facilities (Policy 2) and where it is demonstrated that it will enhance community services and facilities (policy 3). However, they may allow for development in smaller secondary settlements, outside the main built-up areas where there is more access to services and facilities. These central services and facilities might otherwise have benefit these protected groups and so in some instances residents in the smaller secondary settlements may have reduced access to community services and facilities.
- C.16 Policy 39 seeks to deliver affordable housing in rural areas, including that which would support people who provide important community services. This policy may therefore help to ensure the provision of community services to support pregnant women and faith groups at more rural locations. However, residential development outside of larger settlements may leave some residents with poor access to community services and facilities.
- C.17 Policies 15 and Policy 16 seek to restrict development outside of built-up areas that could disrupt the rural and undeveloped nature of the countryside and contribute to settlement coalescence. This may reduce the potential for development to take place in areas with poor access to community facilities, including those that may provide space for meetings for pregnant women and/or faith groups.
- C.18 It is likely that helping to ensure a more legible environment which is easy to navigate would benefit the local population which is becoming increasingly elderly. Policy 5 is expected to have a minor positive effect in relation to the characteristic of **age**, as it seeks to support development which is well laid out and provides convenient and legible connections. The mix of uses on site would also advance equality for the protected characteristics of maternity by providing a range of services and facilities in one location. Improvements to accessibility could also benefit parents with prams. Policy 5 has the potential to have a positive effect on the protected characteristic **disability** provided that the connections between place

make provisions for those in wheelchairs, the blind and deaf.

- C.19 The level of housing to be delivered over the plan period is set out through Policy 37. Delivering higher levels of development over the plan period is likely to respond more favourably to addressing housing affordability in the plan area. This is to be of particular benefit to young people wishing to get on the housing ladder. Policies that seek to ensure the provision of a range of housing sizes and types for specific groups of the community (Policies 38,39,40 and 42,) are likely to provide benefits in terms of helping young people to get on the housing ladder as well as ensuring that homes are suitable for older people. A positive effect is therefore expected in relation to the protected characteristic of **age**.
- C.20 Housing suitable for people with disabilities is supported through a number of policies including Policy 18 ((the provision of housing suitable for wheelchair users), Policy 20, (the delivery of retirement homes and specialist care housing) and Policy 23, (support for annexes to properties that can be used by elderly family members or for staff supporting a dependent or family member). These three policies are expected to have a positive effect on the protected characteristic of disability, with Policy 23 also having a positive effect on age.
- C.21 The Local Plan also includes policies which specifically seek to address the accommodation needs of Gypsies and Travellers. Policy 27 sets out that development must meet the 'specific needs of minority groups within the District, including Gypsies and Travellers and Policy 43 acknowledges that the Council will meet the identified current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. As such, both policies are expected to have a positive effect in relation to the protected characteristic of race.
- C.22 Certain groups in the District are likely to be particularly vulnerable to air pollution. This includes younger and older people, people with cardiovascular or respiratory problems as well as pregnant women. Policies 11 and 12, require the minimisation of air pollution in the District in order to protect human health. This is required through Policy 12 through the use of appropriate mitigation measures such as the implementation of local Air Quality Action Plans, minimisation of traffic measures, the use of cleaner fuels and electric car charging points. These policies are therefore likely to have a positive effect in relation to **age, disability and pregnancy and maternity**.
- C.23 Ensuring that appropriate parking is provided at developments in the District will have benefits for groups who are likely to experience mobility issues. This is supported through Policy 25 and therefore this policy is expected to have a positive effect in relation to **age and disability**.

- C.24 Policy 27 (Inclusive Communities, Health and Wellbeing) is likely to benefit all of the protected characteristics in the District. This policy seeks to address the requirements of all members of the community in new development. This includes the specific needs of older and younger people, minority groups, faiths and other community groups within the district. Furthermore, development is required by this policy to be designed to achieve healthy, inclusive and safe places.
- C.25 Strategic Policies 19 and 20 seek to guide development require new development to be inclusive, 'meeting the needs of all users, with particular consideration given to disability, age and gender, as well as addressing the needs of parents'. The policies are expected to have a positive impact on the protected characteristics of **age, disability, gender, pregnancy and maternity and sexual orientation**. However, a negative impact may result on those going through **gender reassignment** if this protected characteristic is not considered in detailed design elements such as toilet provision.

Findings for the site allocations considered in the Local Plan

- C.26 The large sites being considered for allocation are located at variable locations in relation to the areas of strongest service provision. In general, the sites being considered as urban extensions to larger settlements would provide residents with access to community facilities which might benefit the protected characteristics of **pregnancy and maternity, race and religion or belief**. Sites which are to be provided at smaller settlements would provide more limited access to existing community facilities. As such, overall, the large site options considered are expected to have a mixed (positive and negative) effect in relation to these protected characteristics.
- C.27 It is expected that the large sites options would deliver development in line with development principles for strategic sites as set out in Policy 20. This would require the provision of new community provisions to support strategic scale growth, with benefits likely to result in relation to provision of space for meetings relating to, **disability, pregnancy and maternity and sexual orientation**. The policy also requires the delivery of a range of housing types and tenures to meet the needs of young families, older people and Gypsies and Travellers. As such, the allocation of these sites may result in additional benefits in relation to **age, race and religion or belief**.

- C.28 Small site options that are located within close proximity of the Main Town (Horsham town) or the Small Town and Larger Villages of the District may also provide a good level of access to community services and facilities. A positive effect has therefore been identified for small site options which would provide residential use within or adjacent to the built-up area boundaries for these settlements in the District in relation to the protected characteristics of **age, pregnancy and maternity and religion or belief**. Sites which include housing that are not located within or at the edge of these settlements are less likely to provide access to such services and facilities. Therefore, the allocation of these site options may have an adverse impact in relation to these protected characteristics. A combined positive and negative impact has subsequently been recorded for these protected characteristics.
- C.29 Policy 38 and Policy 39 are expected to help ensure that housing is provided in the District to meet the needs of younger and older people as well as to meet the needs of people with disabilities. As such, the allocation of small site options which provide residential use may result in additional benefits in relation to **age and disability**.

Consultation on the Local Plan

- C.30 As well as the content of the Local Plan, it is important that the protected characteristics of the Equalities Act are taken into consideration when preparing and consulting on the Plan, in particular ensuring that all groups of people have the opportunity to access and participate in consultations.
- C.31 To ensure all groups of people have had opportunity to comment on the development of the Local Plan, the Council utilised its stakeholder database to notify of the start of the consultation (at the time of writing, 5,910 contacts are on this list). In total 6,320 comments were received on the consultation from 3,352 respondents. Respondents included groups and organisations representing those with protected characteristics.
- C.32 To ensure that the consultation was made as accessible as possible, in addition to contacting all those who had signed up to receive notifications for the Local Plan, the Council undertook the following activities:
- Parish Council Workshops – of which 28 out of the 35 Parish/Neighbourhood Councils attended
 - Public Exhibitions – 6 events held throughout the district available for all members of the public to attend (estimated that over 1,000 people attended)
 - Distribution of consultation material, leaflets and exhibition boards to libraries.
 - Adverts in District Post and West Sussex County Times to notify of consultation

- Use of Council's Facebook and Twitter accounts to publicise the consultation
- C.33 Production of YouTube videos to explain different elements of the consultation document and why a Local Plan is needed.

Table 1 Likely effects of the policies in the Horsham Local Plan on the nine protected characteristics under the Equality Act 2010

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 4: Policies for Growth and Change									
Policy 1 – Sustainable Development	0	0	0	0	0	0	0	0	0
Policy 2 – Development Hierarchy	0	0	0	0	+/-	0	+/-	0	0
Policy 3 – Settlement Expansion	0	0	0	0	+/-	0	+/-	0	0
Policy 4 – Horsham Town	+	0	+/-	0	+	0	+	+	+
Policy 5 – Broadbridge Heath Quadrant	+	0	+/-	0	+	0	0	0	0

Policy 4 would contribute to the provision of a range of services and facilities within Horsham town which is considered to be one of the most accessible locations in the District for many residents. This could result in a positive effect in relation to the provision of services relevant to **pregnancy and maternity, the ageing population and sexual orientation**. There is potential for isolation amongst the ageing population, parents and pregnant women to be reduced through increased provision of meetings, classes and activities in locations such as community halls. An increase in the provision of community services and facilities within Horsham Town may also include places in which faith groups can meet and therefore a positive effect is identified for residents in the District in terms of support for **religion or belief, sex, sexual orientation and age**.

Similarly, a positive effect is identified for Policy 2 and 3 in relation to **pregnancy and maternity** and **religion or belief** due to development being supported at locations with a good range of services and facilities (Policy 2) and where it is demonstrated that it will enhance community services and facilities (Policy 3). However, a negative effect may also result. These policies would support some development in smaller secondary settlements and outside of the main built-up areas of settlements, where there is reduced access to services and facilities, which might otherwise benefit these protected groups.

A positive effect is identified for Policy 5 in relation to **age** due to the requirement for development at Broadbridge Heath Quadrant to be delivered to provide strong, legible connections. This approach to development may be particularly sympathetic to the needs of more elderly residents in the District. The policy will also have a positive impact on **pregnancy and maternity** as improved pedestrian and cycle connections will be easier to navigate with a pram. Policy 5 has the potential to have a positive effect on the protected characteristic disability provided that the connections between place make provisions for those in wheelchairs, the blind and deaf.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 5: Climate Change and Water									
Policy 6 – Climate Change	0	0	0	0	0	0	0	0	0
Policy 7 – Appropriate Energy Use	0	0	0	0	0	0	0	0	0
Policy 8 – Sustainable Design and Construction	0	0	0	0	0	0	0	0	0
Policy 9: Water Neutrality	0	0	0	0	0	0	0	0	0
Policy 10 - Flooding	0	0	0	0	0	0	0	0	0
Policies 6 to 10 do not include any direct or indirect references to any of the protected characteristics against which they have been assessed. A negligible effect has therefore been recorded for all protected characteristics.									

Chapter 6: Conserving and Enhancing the Natural Environment

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy 11– Environmental protection	+	+	0	0	+	0	0	0	0
Policy 12 – Air Quality	+	+	0	0	+	0	0	0	0
Policy 13 – The Natural Environment and Landscape Character	0	0	0	0	0	0	0	0	0
Policy 14 – Countryside Protection	0	0	0	0	+	0	+	0	0
Policy 15 – Settlement Coalescence	0	0	0	0	+	0	+	0	0
Policy 16 – Protected Landscapes	0	0	0	0	0	0	0	0	0

Policy 17 – Green Infrastructure and Biodiversity	0	0	0	0	0	0	0	0	0
Policy 18 – Local Greenspace	0	0	0	0	0	0	0	0	0

Elderly, and younger residents can be the more susceptible to poor air quality than other groups of people in the District. People with disabilities relating to cardiovascular and respiratory conditions and pregnant women are also particularly vulnerable to air pollution. As such, a positive effect is identified for Policies 11 and 12 in relation to **age, disability** and **pregnancy and maternity**. Policy 11 requires that development ensures the minimisation of air pollution in order to protect human health. The management of air quality as new proposals are delivered is directly addressed through Policy 12. Measures detailed in the policy include requiring development to contribute to the implementation of local Air Quality Action Plans, minimisation of traffic and encourage the use of cleaner fuels including through the provision of electric car charging points.

Policy 14 and Policy 15 seek to restrict development outside of built-up areas that could disrupt the rural and undeveloped nature of the countryside and contribute to settlement coalescence. This may reduce the potential for development to take place in areas with poor access to community facilities, including those that may provide space for meetings for pregnant women and/or faith groups. As such, a positive effect is identified for these policies in relation to **pregnancy and maternity** and **religion or belief**.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 7: Development Quality, Design and Heritage									
Policy 19 – Development Quality	+	+	?	0	+	0	+	0	+
Policy 20 – Development Principles	+	+	?	0	+		+		+
Policy 21 – Heritage Assets and Managing Change within the Historic Environment	0	0	0	0	0	0	0	0	0
Policy 22 – Shop Fronts and Advertisements	0	0	0	0	0	0	0	0	0
<p>Policy 19 seeks high quality and inclusive design for all development in the District. It is specifically seeking to ensure that developments are accessible and safe, and also that a framework of high quality open spaces are provided to meet the identified needs of the community. These well designed, safe and accessible open spaces have the potential to address the requirements of all members of the community, including the specific needs of older and younger people, minority groups, faith and other community organisations. As such, a positive effect is identified in relation to age, disability, pregnancy and maternity, religion or belief and sexual orientation. A negative impact may result on those going through gender reassignment if this protected characteristic is not considered in detailed design elements such as toilet provision therefore a ? has been recorded against this protected characteristic.</p>									

Strategic Policy 20 seeks to guide development in the district and criterion 11 requires that all development be inclusive, meeting the needs of all users, with particular consideration given to disability, age and gender, as well as addressing the needs of parents. The policy is subsequently expected to have a positive impact on the protected characteristics of **age, disability, gender, pregnancy and maternity and sexual orientation**. Again a negative impact may result on those going through **gender reassignment** if this protected characteristic is not considered in detailed design elements such as toilet provision.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 8 : Infrastructure, Transport and Healthy Communities									
Policy 23 – Infrastructure Provision	0	0	0	0	0	0	0	0	0
Policy 24 – Sustainable Transport	0	0	0	0	0	0	0	0	0
Policy 25 - Parking	+	+	0	0	0	0	0	0	0
Policy 26 – Gatwick Airport Safeguarded Land	0	0	0	0	0	0	0	0	0
Strategic Policy 27– Inclusive Communities, Health and Wellbeing	+	+	+	+	+	+	+	+	+
Policy 28 – Community Facilities, Leisure and Recreation	0	0	0	0	+	0	+	0	0

Older people and members of the community with disabilities are particularly likely to benefit from the provision of safe and convenient parking that improves access to Horsham's town centers and other built-up areas. As such, Policy 25 is likely to have a positive effect in relation to **age** and **disability**.

Policy 27 is likely to have a positive effect in relation to all of the protected characteristics. This policy seeks to ensure developments address the requirements of all members of the community in new development, including the specific needs of older and younger people, minority groups, faith and other community groups within the district. Development is required by this policy to be designed to be healthy, inclusive and safe to meet the long-term needs of a range of occupiers.

The provision of new or improved community facilities and services will contribute to providing buildings that benefit specific groups of the community. This type of provision is likely to provide space for meetings for pregnant women and/or faith groups in the area. As such, Policy 28 is expected to have a positive effect in relation to **pregnancy and maternity** and **religion or belief**.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Chapter 9: Economic Development									
Policy 29 – New Employment	0	0	?	0	0	0	0	0	0
Policy 30 – Enhancing Existing Employment	0	0	0	0	0	0	0	0	0
Policy 31– Rural Economic Development	0	0	0	0	0	0	0	0	0
Policy 32 – Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Uses	0	0	0	0	0	0	0	0	0
Policy 33 – Equestrian Development	0	0	0	0	0	0	0	0	0
Policy 34 – Tourism Facilities and Visitor Accommodation	0	0	0	0	0	0	0	0	0

Policy 35 – Town Centre Hierarchy and Sequential Approach	0	0	0	0	+	0	+	0	0
Policy 36 – Town Centre Uses	0	0	0	0	0	0	0	0	0

Policy 35 supports development that will contribute to the vitality and viability of town centres by set out a town centre first approach with main town centre uses to be encouraged at these locations. These locations are noted to be the most accessible in the District. There is potential for the policy to have a positive effect in terms of resident’s ability to access services relevant to **pregnancy and maternity** and **religion or belief**. Specifically, benefits may occur through improved access to community spaces that facilitate meetings, classes and activities or places of worship.

There is potential to positively impact those going through gender reassignment if this is considered when designing the workplace. Equally there is potential to negatively impact this protected characteristic if this design consideration is omitted. As such a ? has been recorded **for gender reassignment** for policies 29 and 32.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Housing (inc Allocations)									
Policy 37 – Housing Provision	?	0	0	0	0	0	0	0	0
Policy HA1 – Strategic Site Development Principles	+	0	0	0	+	+	+	0	0
Policy 38 – Meeting Local Housing Needs	+	0	0	0	0	0	0	0	0
Policy 39 – Affordable Housing	+	0	0	0	+/-	0	+/-	0	0
Policy 40 – Improving Housing Standards in the District	+	+	0	0	0	0	0	0	0
Policy 41 – Rural Exception Homes	0	0	0	0	+/-	0	+/-	0	0
Policy 42 – Retirement Housing and Specialist Care	+	+	0	0	0	0	0	0	0

Policy 43 – Gypsy and Traveller Accommodation n	0	0	0	0	0	+	0	0	0
Policy 44 – Rural Workers' Accommodation	0	0	0	0	0	0	0	0	0
Policy 45 – Replacement Dwellings and House Extensions in the Countryside	0	0	0	0	0	0	0	0	0
Policy 46 – Ancillary Accommodation	+	+	0	0	0	0	0	0	0

Policy 37 sets out options for the quantum of housing to be provided over the plan period. Requirements for how new housing should be provided in terms achieving an appropriate mix and high standard of housing are set out through the remaining policies in the 'Housing' chapter of the Local Plan. Requiring a higher level of growth over the plan period is likely to address housing affordability in a more positive manner. This could be of particular benefit to younger people wishing to get on the housing ladder. Given that the level of housing to be provided over the plan period is currently undecided the effect of this policy in relation to **age** is uncertain.

Policy HA1 sets out overarching principles for the delivery of strategic scale sites, which includes a requirement that they should provide a range of housing types to meet the needs of young families, older people and Gypsies and Travellers. Development is also expected to deliver supporting services and facilities which is to include community buildings. As such, a positive effect is identified for this policy in relation to **age, pregnancy and maternity, race and religion or belief**.

Policy 38 seeks to support development that will provide a mix of housing sizes and types. Delivering an appropriate mix of housing is expected to help meet the needs of younger people seeking to buy their first home as well as the needs of housing needs of an increasingly elderly population. Therefore, a positive effect is identified in relation to **age**.

Policy 39 sets the councils thresholds for affordable housing to ensure housing remains affordable for those who cannot compete in the housing market. Delivering affordable housing is expected to help meet the needs of younger people seeking to buy their first home as well as the needs of housing needs of an increasingly elderly population. Therefore, a positive effect is identified in relation to age. This policy may also help to ensure the provision of community services to support pregnant women and faith groups at more rural locations. However, residential development outside of larger settlements may leave some residents with poor access to community services and facilities. The policy is therefore expected result in a mixed (positive and negative) effect in relation to **pregnancy and maternity** and **religion or belief**.

Policies 40, 42 and 46 also include provisions that will benefit the residential needs of elderly and disabled people in the District. Policy 40 requires that new development meets housing standards that will ensure that there is delivery of homes that are suitable for wheelchair users; Policy 42 supports the delivery of retirement homes and specialist care housing; and Policy 46 provides support for annexes to properties that might be used by elderly family members or staff supporting a dependent or family member. As such, these policies are likely to have a positive effect in relation to **age** and **disability**.

Policy 41 supports the delivery of affordable housing in rural areas in exceptional circumstances where there is an identified local need for homes. The policy may result in a mixed effect (positive and negative) in relation to **pregnancy and maternity** and **religion or belief**. Support for this type of development is encouraged where the need is from people whose work provides important services to residents in the parish. This could support the functioning of community services at more rural locations, allowing for benefits in relation to groups such as pregnant women or faith groups. However, the delivery of housing outside of larger settlements may result in people living in locations where they have poor access to places of worship and/or community buildings which support meetings/services related to **pregnancy and maternity**.

A positive effect is identified for Policy 43 in relation to **race** as it directly supports the delivery of development to meet the identified current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople.

Table 2 Likely effects of the Large sites allocations in the Horsham Local Plan on the nine protected characteristics under the Equality Act 2010

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Strategic sites	+	0	0	0	+	0	+	0	0
<p>The large sites considered for allocation through the Local Plan are at variable locations in the District in relation to existing services and facilities. This includes community facilities which provide space for meetings relating to pregnancy and maternity and faith groups. The large scale allocations are being provided as urban extensions to existing settlements (West of Ifield, East of Billingshurst, and West of Southwater) and as such would provide more immediate access to existing provisions. As such a positive effect has been recorded in relation to age, pregnancy and maternity and religion or belief.</p> <p>Development at large sites should be in line with Policy HA1 (Strategic Site Development Principles) meaning they should include the delivery of services and facilities that ensure the successful functioning of these sites. These provisions could include new space for meetings relating to pregnancy or maternity, the LGBTQ+ community and faith groups. The policy also requires the delivery of a range of housing types and tenures to meet the needs of young families, older people and Gypsies and Travellers. As such, the allocation of these sites may result in additional benefits in relation to age, pregnancy and maternity, sexual orientation, race and religion or belief.</p>									
Small sites	+/-	+	0	0	+/-	0	+/-	0	0

Small site options that are located within close proximity to Horsham town or the Small Town and Larger Villages of the District should provide a good level of access to community services and facilities. Premises such as community halls for example might be used for meetings, classes and activities, thereby providing support and reducing isolation for parents or the elderly. Community facilities may also include places of worship which would be of benefit for residents in terms of support for religion or belief. Those sites which are located within or at settlement edge of the Main Town (Horsham town) or Small Towns and Larger Villages of the District provide access to good range of services and facilities. As such a positive effect has been identified for allocations in the following settlements: Broadbridge Heath, Horsham, Henfield, Pulborough, Steyning and Storrington and Sullington.

Sites that include housing which are not located within or at settlement edge of the Main Town (Horsham town) or Small Towns and Larger Villages of the District are less likely to provide access to services and facilities, meaning whilst there may be some benefit, allocation of the sites in Ashington, Barns Green, Cowfold, Rusper, Partridge Green, Rudgwick, Lower Beeding, Small Dole, Thakeham, Warnham and West Chiltington may have an adverse impact in relation to the protected characteristics of **age, pregnancy and maternity and religion and belief**.

As such a mixed positive / negative effect is expected for the small sites in relation to **age, pregnancy and maternity and religion or belief**.

** The development of new homes in the District would be in line with Policy 17 (Housing Mix) and Policy 19 (Improving Housing Standards in the District) which will help to ensure that housing to meet the needs of younger and older people as well as people with disabilities. As such, the allocation of these sites may result in additional benefits in relation to **age and disability**.

** Note that the criteria applied to the appraisal of sites as part of the EqIA differs from the criteria applied to the appraisal of sites as part of the Sustainability Appraisal in the main SA Report and therefore the effects identified are not the same between the two assessments.*

Conclusion

- C.34 The EqIA has examined whether the Horsham Regulation 19 Horsham District Local Plan 2023 has an adverse impact on or discriminated against different groups in the community with specific consideration to groups identified under the nine protected characteristic as identified in the Equalities Act 2010.
- C.35 The assessment identified that all policies within the Local Plan are likely to have either a positive, mixed positive and negative or neutral impact on the protected characteristics. No adverse impacts have been identified meaning it is not necessary to move further into the EqIA Process and require action planning. The identified benefits will also have benefits for the wider community.
- C.36 Based on the judgements made in the EqIA, it is not considered that any measures are required to mitigate against any adverse impacts. Due regard has been given to the three aims expressed in paragraph 149 of the Equalities Act and it is considered that the plan will work to eliminate discrimination by including policies that are inclusive, provide equal opportunity for all and foster good relations between persons where possible within the remits of Local planning.
- C.37 The Council will monitor the implementation and impact of the Local Plan policies through the production of its Annual Monitoring Report (AMR).