

2026 Review of the Equalities Impact Assessment of the Horsham District Local Plan, June 2026

1. This report presents the findings of an assessment of the likely effects on equalities issues of the Schedule of Suggested Main Modifications to the Regulation 19 Local Plan dated June 2026. The Main Modifications schedule is to be considered by the Council's Cabinet on 6 July 2026.
2. The requirement to undertake a 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.
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.
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
5. There are three main duties set out in the Equality Act 2010¹, which public authorities including Horsham District Council are required to meet in exercising their functions. These are:

¹ Section 149(1) of the Equality Act 2010

- 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.

The Regulation 19 Horsham District Local Plan

6. The Regulation 19 Draft 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.
7. The Horsham District Council Schedule of Suggested Modifications to the Regulation 19 Local Plan June 2026 document sets out proposed wording amendments to 42 policies, increasing the overall housing number from 13,212 to 18,712 and identifies 17 new site allocations in respect of the Inspectors recommendations following the reopening of the Local Plan examination in early 2026.
8. This document reviews those suggested modifications in light of the nine protected characteristics listed above to ensure the changes do not result in discrimination or the marginalisation of any group in any way.
9. 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

10. The Regulation 19 Draft Horsham Local Plan (January 2024) and accompanying SA/SEA Addendum 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 in the 2024 EqIA document which is appended to the SEA Report as Appendix C.

Method

11. The Horsham District Council Schedule of Suggested Modifications to the Regulation 19 Local Plan June 2026 has been reviewed to consider the likely impacts of the amendments to the 42 land use policies and 17 new site allocations 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.

12. 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
?	Neutral or unknown
0	No Change
-	Negative

13. 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.

14. 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 intends to benefit from a policy.

Findings

15. A summary of the changes made to each policy is presented in Table 1 together with information on the proposed new site allocations in Table 2.

16. The findings of the EqIA on the amended 40 land use policies are presented in Table 3, while Table 4 presents the findings of the EqIA on the 17 new site allocation policies. Where the policy change has had no impact on the nine protected characteristics a score of 0 has been given.

17. Where an impact has been identified 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.

Table 1: Summary of changes to policy

Amended Policy Number	Proposed Change
Strategic Policy 3	Amended policy wording and two deleted criterion
Strategic Policy 4	Amended policy wording

Strategic Policy 5	Additional sentence added
Strategic Policy 6	Amended policy wording
Strategic Policy 7	Energy Hierarchy deleted
Strategic Policy 8	Policy criterion deleted
Strategic Policy 9	Amended policy wording and policy renamed
Strategic Policy 10	Total re-write of policy
Strategic Policy 11	Amended policy wording
Strategic Policy 12	Additional policy criterion
Strategic Policy 13	Amended policy wording
Strategic Policy 14	Amended policy wording
Strategic Policy 15	Deleted Policy
Strategic Policy 16	Amended policy wording
Strategic Policy 17	Amended policy wording and deleted criterion 7
Strategic Policy 18	Amended policy wording
Strategic Policy 19	Total re-write of policy
Strategic Policy 20	Deleted Policy
Strategic Policy 21	Amended policy wording
Strategic Policy 23	Amended policy wording
Strategic Policy 24	Amended policy wording
Strategic Policy 25	Amended policy wording
Strategic Policy 26	Amended policy wording
Strategic Policy 27	Amended policy wording
Strategic Policy 28	Amended policy wording
Strategic Policy 29	Amended policy wording
Strategic Policy 30	Amended policy wording
Strategic Policy 31	Amended policy wording
Policy 32	Amended policy wording
Strategic Policy 34	Deleted Criterion 1b
Strategic Policy 36	Amended policy wording
Strategic Policy 37	Amended policy wording
Strategic Policy 38	Amended policy wording
Strategic Policy 39	Amended policy wording
Strategic Policy 40	Amended policy wording
Strategic Policy 42	Amended policy wording & deleted criterion 1b
Strategic Policy 43	Amended policy wording
Strategic Policy HA1	Amended policy wording
Strategic Policy HA2	Amended policy wording
Strategic Policy HA3	Amended policy wording
Strategic Policy HA4	Amended policy wording
Strategic Policy HA15	Amended policy wording
Strategic Policies HA19, HA20 and HA21	Amended Policy Wording

Table 2: New Allocations

New Allocations: Policy Number	Summary of Allocation
NEW POLICY Adversane	3200 Homes
Strategic Policy HA5, ASN2	Ashington Northern Cluster – 450 homes
Strategic Policy HA6: BGR4	Land at the Rear of Two Mile Ash Road – 10 homes
NEW POLICY Small Site Allocation at Billingham BL1	Land at Old Reservoir – 80
Strategic Policy HA8: CW3:	Land East of Cowfold – 100 homes
Strategic Policy HA9: Henfield: HNF2: HNF3	Land North of Furners Lane (191 homes) and Land East of Henfield (450 homes).
Strategic Policy HA10 Horsham	Additional Allocation at Horsham HOR3 Land South of New Place Farm (120 homes)
NEW POLICY	Additional Policy – KV1 -Land at Kilwood Vale additional allocation of 350 homes
Strategic Policy HA11 Lower Beeding:	Additional Allocations at Lower Beeding LWB4 incorporating land parcels ‘Land at Sandygate’ and ‘Land at Cedar Road’ (28 dwellings)
Strategic Policy HA12 Partridge Green:	Additional Allocation PG4 Land at Dunstans 80 homes
Strategic Policy HA14 Rudgwick and Bucks Green:	Additional Allocation RD3 Land West of Church Street Rudgwick (15 homes).
Strategic Policy HA16: Small Dole	Additional Allocation SMD2 Land at Highdown Nursery (10 homes).
NEW POLICY : New Allocation at Southwater SW1	South of Hogs Wood, (100 homes).
Strategic Policy HA18: Storrington & Sullington	New allocations at Storrington; STO3 Land South of Northlands Land (30 homes), STO04 Land at Fryern Road (50 homes) STO5 Land at Bax Close (30 homes),

Table 3 Likely effects of the changes to policies in the Horsham Local Plan on the nine protected characteristics under the Equality Act 2010

Policy	Age	Disability	Gender Reassignment	Marriage & Civil Partnership	Pregnancy and maternity	Race	Religion & Belief	Sex	Sexual Orientation
Amended Policies									
Strategic Policy 3	0	0	0	0	0	0	0	0	0
Strategic Policy 4	0	0	0	0	0	0	0	0	0
Strategic Policy 5	0	0	0	0	0	0	0	0	0
Strategic Policy 6	0	0	0	0	0	0	0	0	0
Strategic Policy 7	0	0	0	0	0	0	0	0	0
Strategic Policy 8	0	0	0	0	0	0	0	0	0
Strategic Policy 9	0	0	0	0	0	0	0	0	0
Strategic Policy 10	0	0	0	0	0	0	0	0	0
Strategic Policy 11	0	0	0	0	0	0	0	0	0
Strategic Policy 12	+	+	0	0	+	0	0	0	0
Strategic Policy 13	0	0	0	0	0	0	0	0	0
Strategic Policy 14	0	0	0	0	0	0	0	0	0
Strategic Policy 15	0	0	0	0	0	0	0	0	0
Strategic Policy 16	0	0	0	0	0	0	0	0	0
Strategic Policy 17	0	0	0	0	0	0	0	0	0
Strategic Policy 18	0	0	0	0	0	0	0	0	0
Strategic Policy 19	+	+	?	0	+	0	+	0	+
Strategic Policy 20	0	0	0	0	0	0	0	0	0
Strategic Policy 21	0	0	0	0	0	0	0	0	0
Strategic Policy 23	+	+	0	0	+	0	+	0	0
Strategic Policy 24	+	+	0	0	+	0	0	0	0
Policy 25	0	0	0	0	0	0	0	0	0
Strategic Policy 26	0	0	0	0	0	0	0	0	0

Strategic Policy 27	0	0	0	0	0	0	0	0	0
Strategic Policy 28	0	0	0	0	+	0	+	0	0
Strategic Policy 29	0	0	0	0	0	0	0	0	0
Strategic Policy 30	+	+	0	0	+	0	0	0	0
Strategic Policy 31	0	0	0	0	0	0	0	0	0
Policy 32	0	0	0	0	0	0	0	0	0
Strategic Policy 34	0	0	0	0	0	0	0	0	0
Strategic Policy 36	0	0	0	0	0	0	0	0	0
Strategic Policy 37	+	0	0	0	0	0	0	0	0
Strategic Policy 38	0	0	0	0	0	0	0	0	0
Strategic Policy 39	-	0	0	0	0	0	0	0	0
Strategic Policy 40	0	0	0	0	0	0	0	0	0
Strategic Policy 42	+	0	0	0	0	0	0	0	0
Strategic Policy 43	Need to see Appendix 2								
Strategic Policy HA1	0	0	0	0	0	0	0	0	0
Strategic Policy HA2	0	0	0	0	0	0	0	0	0
Strategic Policy HA3	+	0	0	0	0	0	0	0	0
Strategic Policy HA4	+	0	0	0	0	0	0	0	0
Strategic Policy HA15									
Justification									

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. All these groups of people can access and enjoy the MENS SAC. As such, a positive effect is identified for the changes to **Policies 11 and 12** in relation to age, disability and pregnancy and maternity.

Policy 15 sought 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 provide space for meetings for pregnant women and/or faith groups. Whilst deleting the policy may have a negative impact on these groups, coalescence has been addressed through Strategic Policy 14 therefore the impact is noted as neutral.

Whilst the wording has been revised, **Policy 19** still seeks to ensure 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.

Changes to **Policy 23** ensure that infrastructure upgrades will be in delivered at the right time to serve the development. These new community facilities 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.

Access to reliable bus transport can benefit the elderly, those with mobility needs and mothers with pushchairs, The strengthening of the wording of **Policy 24** to ensure bus travel serves the community is noted as a positive effect in relation to age, disability and pregnancy and maternity.

Whilst the wording to **Policy 27** has been amended no significant effects on the protected characteristics have been identified. The strengthening of **Policy 28** to give substantial weight to the benefits of providing new or improved public service infrastructure and community facilities 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 the changes to Policy 28 are expected to have a positive effect in relation to pregnancy and maternity and religion or belief.

The strengthening of **Policy 30** to give reference to community uses may contribute towards providing facilities that benefit specific groups of the community, including feeding space for breastfeeding mothers or prayer rooms for faith groups. As such the changes to Policy 30 have been scored positive in relation to pregnancy and maternity and religion or belief.

Requiring a higher level of growth over the plan period in **Policy 37, Policy HA3 and HA4** 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. A positive impact in relation to Age has therefore been recorded against these policies.

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. Reducing the amount of affordable housing required through **Policy 39** could therefore have a negative impact in relation to age.

Whilst **Policies 40 and 46** include provisions that will benefit the residential needs of elderly and disabled people in the District, the changes to these policies are not likely to impact the protected groups as standards are already covered by national policy, therefore a 0 score has been recorded.

Changes to **Policy 42** provide greater flexibility for appropriate expansion of existing retirement communities where these do not adjoin a settlement boundary therefore a positive impact has been recorded against age.

Policy	Age	Disability	Gender Reassignment	Marriage & Civil Partnership	Pregnancy and maternity	Race	Religion & Belief	Sex	Sexual Orientation
New Allocations									
NEW POLICY HA(NP1)Adversane	+	+	0	0	+	+	+	0	0
Strategic Policy HA5, ASN2	+	+	0	0	0	0	0	0	0
Strategic Policy HA6: BGR4	+	0	0	0	0	0	0	0	0
NEW POLICY HA(NP1) Small Site Allocation at Billingham BL1	+	0	0	0	0	0	0	0	0
Strategic Policy HA8: CW3:	+	0	0	0	0	0	0	0	0
Strategic Policy HA9: Henfield: HNF2 & HNF3	+	0	0	0	0	0	0	0	0
Strategic Policy HA10 Horsham	+	0	0	0	0	0	0	0	0
Strategic Policy HA11 Lower Beeding:	+	0	0	0	0	0	0	0	0
Strategic Policy HA12 Partridge Green:	+	0	0	0	0	0	0	0	0
Strategic Policy HA14 Rudgwick and Bucks Green:	+	0	0	0	0	0	0	0	0

Strategic Policy HA16: Small Dole	+	0	0	0	0	0	0	0	0
NEW POLICY : HA(NP4) New Allocation at Southwater SW1	+	0	0	0	0	0	0	0	0
Strategic Policy HA18: Storrington & Sullington	+	+	0	0	+	0	0	0	0

Justification

The allocation of 3,200 new homes in **Policy HP(NP1)** Adversane with particular provision for older people's and specialist care housing 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 and the ageing population post-retirement age. The provision of local health care facilities will also benefit the elderly and pregnant women and new mothers if provided and the new sports hub will benefit the younger population. The inclusion of 15 Gypsy and Traveler pitches within this allocation will have a positive impact on race and the provision of a new neighbourhood centre has the potential to provide facilities that benefit certain groups such as meeting space for meetings for pregnant women and/or faith groups in the area. As such, a positive effect has been recorded in relation to age, race, pregnancy and maternity and religion or belief.

New housing allocations within **Policies HA5, HA6, HA(NP2), HA8, HA9, HA10, HA11, HA12, HA14, HA16, HA18** is likely to address housing affordability in a more positive manner therefore a positive score in relation to age has been recoded for these policies.

New open space provision in **Policy HA5** is likely to benefit the younger population and those with disabilities who benefit from time spent in fresh air. A positive score has been recorded for age and disability against these policies.

Improvements to bus, cycling and pedestrian infrastructure as identified in policies HA18 and HP(NP1) can benefit the elderly, those with mobility needs and mothers with pushchairs, a positive effect in relation to age, disability and pregnancy and maternity has been recorded for these policies.

Representations period on the Main Modifications

18. 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. The Statement of Community Involvement² provides examples of groups who may be contacted and involved where appropriate, this includes youth groups, older persons groups/organisations, faith groups and disability groups.
19. The preparation of the Local Plan and any required consultations have been and will continue be undertaken with regard to the Equalities Act 2010 and the Public Sector Equality Duty. For example, the consultation materials and facilities for submitting representations will be made available through a range of channels, including online access, hard copies and, if required in-person support at Council offices.
20. The Council maintains a stakeholder database containing individuals and groups who have stated an interest in local plans in Horsham District which includes all those invited to make representations at the Regulation 19 stage (except anyone who has requested to have themselves removed). These stakeholders will be informed of the Main Modifications representation period. The database includes groups and organisations representing those with protected characteristics.

² <https://www.horsham.gov.uk/planning/planning-policy/statement-of-community-involvement>