



Wyre Council
Publication Draft Wyre Local Plan Partial
Review (2011-2031)

Equalities and Health Impact
Assessment
November 2021

Contents

1. Introduction, page 3
2. Background, page 4
3. The Adopted Wyre Local Plan, page 7
4. Methodology, page 9
5. Screening the Wyre Local Plan Partial Review (Stage 1), page 11
6. Scoping the Wyre Local Plan Partial Review (Stage 2), page 12
7. Information Gathering (Stage 3), page 13
8. Impact Assessment (Stage 4), page 14
9. Recommendations (Stage 5), page 19
10. Monitoring, page 19
11. Conclusion, page 19

1. Introduction

- 1.1 The Wyre Local Plan 2011-2031 (WLP31), adopted in February 2019, contains Policy LPR1 that requires an early partial review of the Plan. The scope of the review is established by the policy and is, in summary, to update the housing Objectively Assessed Needs (OAN), review the transport and highways matters and to review the allocation of sites to meet the full OAN. These are the specific matters for the review. There is no obligation upon the council to consider any other matters i.e. to take the review outside of the scope of LPR1.
- 1.2 As part of the plan preparation stage and pursuant to Regulation 18¹, on 28 February 2020 the council issued a consultation on the scope of the partial review. The consultation and the council's response established two elements to the review - compliance with Policy LPR1 and conformity with the NPPF 2019, subsequently updated in July 2021 (see the council's Statement of Consultation).
- 1.3 By definition, the partial review does not encompass a full review of the WLP 31 and all of the strategic matters that such a process would consider. It is limited in scope and at the time of writing proposes a limited number of amendments to adopted policies. Given the limited amendments to policies, the council has decided to combine what would normally be separate assessments of equalities and health impacts. This combined Equalities and Health Impact Assessment (EqHIA) has been produced in order to consider whether or not the proposed policy amendments have the potential to have impacts in terms of equalities and health on the borough's population and those that work and visit here.
- 1.4 This EqHIA has been carried out by Len Harris, Senior Planning Officer, Planning Policy, Wyre Council. It is based on the Publication Draft Wyre Local Plan (2011-2031) Wyre Local Plan Schedule of Revisions (2011-2031) (the Schedule). If necessary, it will be reviewed and amended prior to the

¹ The Town and Country Planning (Local Planning)(England) Regulations 2012 (as amended)

submission of the Wyre Local Plan Partial Review (2011-2031) for public examination.

2. Background

Equalities

- 2.1 An Equality Impact Assessment (EqIA) is a systematic way of examining whether a new or existing function, policy or process differentially affects any person or group of persons.
- 2.2 An EqIA can both identify any potentially discriminatory or negative consequences of a policy for a particular group, but can also be used positively to demonstrate the potential benefits for particular communities arising from a proposed policy or project.
- 2.3 EqIA's are not a legal requirement in England, but can be carried out as part of the council's Public Sector Equality Duty under the Equality Act 2010. To comply with the Duty due regard must be had to the following (which can be considered as aims of the Duty):
 1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010.
 2. The need to advance equality of opportunity between persons who share a relevant protected characteristic (see below) and those who do not share it. This involves having due regard, in particular, to the need to:
 - a. remove or minimise disadvantage suffered by persons who share a relevant protected characteristic;
 - b. take steps to meet the needs of persons who share a relevant 'protected characteristic' that are different from the needs of people who do not share it. In relation to disabled people, this includes, in particular, steps to take account of disabled persons' impairments (disabilities); and

- c. encourage persons who share a protected characteristic to **participate** in public life or in any other activity in which participation by such persons is disproportionately low.

3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to:

- a. tackle prejudice; and
- b. promote understanding.

2.4 In the context of these “aims”, the Duty requires the council to consider the effect or impact of its policies and practices on people who share the following ‘protected characteristics’:

- Age - this can be a specific age, or refer to people in specific age groups;
- Disability – this refers to persons with physical and/or mental impairments which have a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities;
- Gender reassignment – this refers to people in the process of transitioning from one gender to another;
- Marriage and civil partnerships - marriage can refer to a union between a man and a woman or between same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act). Note that the first aim of the duty applies to this characteristic (eliminate discrimination etc) but that the other aims (advancing equality and fostering good relations) do not apply.
- Pregnancy and maternity - pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. Protection against maternity discrimination is for 26 weeks after giving birth,

- Race – this refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
- Religion and belief - religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.
- Sex - refers to the male or female.
- Sexual orientation - whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Health

- 2.5 The World Health Organisation defines a Health Impact Assessment (HIA) as a practical approach used to judge the potential health effects of a policy, programme or project on a population, particularly on vulnerable or disadvantaged groups. It emphasises that the aim for decision makers should be to maximise positive health effects and minimise those that are negative. With this in mind, a HIA can inform choices about alternatives and improvements to policies or programmes to actively promote good health.
- 2.6 The National Planning Policy Framework 2021 (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development with the social objective of supporting strong, vibrant and healthy communities in the context of meeting housing needs in well designed and safe places with accessible services and open spaces that support health, social and cultural well-being. In so doing plans should:
- Promote social interaction;
 - Create safe and accessible places, including the promotion of public safety, taking into account wider security and defence requirements;
 - Enable and support healthy lifestyles;
 - Provide for social, recreational and cultural facilities and services; and

- Support the provision of public service infrastructure including a choice of school places that meet the needs of the community.

2.7 Positive planning is an essential component of creating healthy places as recognised by Planning Practice Guidance:

The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population)..... (Paragraph 001 Reference ID:53-001-20190722.)

A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing. It is a place which is inclusive and promotes social interaction. (Paragraph: 003 Reference ID:53-003-20191101.)

3. The Adopted Wyre Local Plan

3.1 The Wyre Local Plan 2011-2031 was adopted on 28 February 2019. It establishes the strategic and detailed policies to guide development in Wyre and to identify key areas for protection such as the green belt and countryside. It contains:

- A spatial vision for Wyre to 2031;
- 12 objectives to achieve the vision;
- A spatial development strategy to meet these objectives;
- Eight strategic policies to guide and control the overall scale, type and location of new development and infrastructure investment;

- Six Core Development Management policies that provide additional policy guidance;
- 11 policies relevant to housing matters, including establishing the number of homes to be built in the plan period; and
- 15 policies that are relevant to economic matters, including establishing the amount of employment land supply.

3.2 The strategy of the plan is one of development within environment limits. The Vision is one of sustainable growth in a manner that supports the boroughs development requirements whilst creating opportunities for the development of social infrastructure. The Vision explicitly recognises the need to reduce social and health inequalities through a combination of a high quality and green environment and a greater choice in housing and employment opportunities, with well-connected green spaces and access to the countryside providing opportunities to adopt an inclusive and healthier lifestyle. This is reflected in the Plan's objectives, particularly objective 9:

To achieve a healthy environment with accessible high quality green infrastructure with opportunities for active recreation that contributes to the improvement in the general health and well-being of the population and promotes healthy lifestyle choices.

3.3 This objective finds expression in a number of policies including those concerned with the design of development and the provision of green infrastructure. Policy SP8 Health and Well-Being provides specific support for development that promotes healthy communities and includes the requirement for developers to undertake site specific HIAs where the council deems this necessary.

3.4 It is easy to see how many aspects of the local plan policy framework intersects with issues relating to equalities and health. This policy framework for the Local Plan can also be adapted to create a framework for the EqHIA of the Local Plan partial review in terms of the desired policy outcomes. The list of ten policy outcomes below is therefore not exhaustive but is considered representative of

the Local Plan Vision and policies, and reflective of national planning policy as expressed in the NPPF and PPG:

1. Reduce social and health inequalities
2. Promote healthy lifestyle choices
3. Provide access to high quality green infrastructure
4. Provide opportunities for active recreation
5. Support the provision of local infrastructure services
6. Create opportunities to meet housing needs, including that for older and younger people
7. Facilitate investment in the borough's economy and support local job growth
8. Minimise environmental impact and promote good environmental stewardship
9. Support measures to mitigate and adapt to climate change.
10. Promote safe and well-designed places.

3.5 The EqHIA that follows utilises these policy outcomes as the assessment framework in a similar manner to the use of objectives in a Sustainability Appraisal.

4. Methodology

4.1 Equalities and Health Impact Assessments provide a systematic way of examining whether a new or existing function, policy or process differentially affects equalities or health.

4.2 There is no standardised template for conducting a EqIA or HIA. However, the WHO identifies five stages to a HIA methodology which are considered to be logical and reasonable: screening, scoping, appraisal, reporting, and monitoring. These are similar to a typical process for conducting an EqIA and as such provide a logical and consistent approach.

Stage 1 - Initial screening – is an EqHIA required?

Stage 2 - Scoping – defining the scope of the EqHIA, including determining objectives.

Stage 3 - Information gathering – identifying baseline information to establish the context in Wyre.

Stage 4 – Impact assessment - by making a judgement based on the best available information and evidence, the EqHIA establishes the effect that a policy amendment might have on equalities or health. This impact may be:

- Positive
- Negative
- Both positive and negative
- Neutral
- No impact

For the equalities element, this aspect is considering the effect that a policy amendment might have on an equalities community in the context of the three aims of the PSED detailed above.

Stage 5 – Recommendations – recommended action to address negative impacts or otherwise improve the approach to equalities.

4.3 In some cases the impact may be unknown or unknowable (uk).

4.4 The impact assessment has been framed around four simple questions which act as a guide for the process:

- i. What is the purpose and intent of the revised policy?
- ii. How is it intended to work? This question requires the impact assessment to ‘walk through’ the policy revision and its implementation and consider what equalities or health impacts emerge in the context of the ten policy outcomes identified above.
- iii. Who benefits and how? Are there any potential differential impacts across populations and any potential disadvantage caused?
- iv. Are there likely to be any unintended consequences?

5. Screening the Wyre Local Plan Partial Review (Stage 1)

- 5.1 The current Local Plan was adopted in February 2019. It was adopted following a period of public examination based on a number of submitted documents including an Equality Impact Assessment but not a Health Impact Assessment.
- 5.2 The EqIA was submitted as part of the council's evidence that the plan as proposed was legally sound. The examining Inspector found that the Plan met all legal requirements.
- 5.3 This EqHIA provides an assessment of the equalities and health impact relating to the proposed policy revisions. It does not concern itself with:
- policies not subject to review;
 - the content of revised policies outside of the proposed revision itself unless the revision changes the meaning of the policy; or
 - proposed changes to the supporting narrative.
- 5.4 The policies of the Wyre Local Plan apply to the whole of the borough, including that part within the Forest of Bowland Area of Outstanding Natural Beauty. They will be used by the council to guide and manage development in the borough over the next 10 years. The new Wyre Local Plan will consist of the retained policies of the adopted plan and those revised through the partial review process.
- 5.5 Broadly, the role of the Local Plan is twofold:
1. To identify key local issues and provide a set of strategic and development management policies to manage change; and
 2. To identify the overall scale of development, including the need for housing and employment land, across the borough and to allocate sites accordingly.
- 5.6 The Wyre Local Plan Partial Review (2011-2031) is limited in scope and concerns itself with:

- Addressing Wyre’s Objectively Assessed Need for housing (aka. Local Housing Need); and
- Ensuring policies are consistent with the National Planning Policy Framework, 2021.

5.7 The policies and allocations will be a material consideration in determining planning applications.

5.8 The Local Plan will ensure that appropriate forms of development can occur in the most suitable locations. It helps provide a level of certainty about what areas will be developed or protected in the future and for what purpose.

5.9 Although the council is undertaking a partial as opposed to a full review of the Local Plan, given its geographical coverage and impact on social, economic and environmental matters there is the potential for the reviewed document to have implications relevant to the Public Sector Equality Duty and to potential health impacts across all communities who live and work in Wyre. As such, an assessment of equality and health impacts should be undertaken.

6. Scoping the Wyre Local Plan Partial Review (Stage 2)

6.1 An EqHIA can take different forms in terms of the depth of investigation and resource input. It is an important principle that this EqHIA is proportionate to the nature of the policies under assessment. In this instance the partial review process has identified a limited number of proposed amendments to the adopted Local Plan. The council is proposing amendments to six policies (SP1, SP4, HP1, HP3, HP4, and EP5) and the deletion of one policy (LPR1) as set out in the table below. The amendments are proposed to meet the requirements of policy LPR1 and the scope of the partial review in regards to an update of the Objectively Assessed Housing Need (Local Housing Requirement) and ensuring conformity with the latest National Planning Policy Framework 2021.

Wyre Local Plan (2011–2031)	Wyre Local Plan Partial Review (2011 – 2031)
SP1 Development Strategy	SP1 Development Strategy
SP4 Countryside Areas	SP4 Countryside Areas
HP1 Housing Land Supply	HP1 Housing Requirement and Supply
HP3 Affordable Housing	HP3 Affordable Housing
HP4 Rural Exceptions	HP4 Exception Sites
EP5 Main Town Centre Uses	EP5 Main Town Centre Uses
LPR1 Wyre Local Plan Review	Policy Deleted

6.2 The limited extent of the proposed amendments compared to the scope of the Local Plan overall suggests the most appropriate course of action is to undertake a “rapid” EqHIA; that is a review based on an analysis of potential impacts utilising known and publicly accessible data sources and professional judgement.

6.3 This “publication” edition of the EqHIA is published as a supporting document alongside the Publication Wyre Local Plan Partial Review (2011-2031). It is intended that any comments on the EqHIA will be assessed and will inform the version that will be submitted to the government in support of the Submission the Publication Wyre Local Plan Partial Review (2011-2031).

7. Information Gathering (Stage 3)

7.1 In order to carry out a meaningful EqHIA it is important that the authority has a good understanding of the population and health characteristics of its local communities and the issues they may face. The EqIA published August 2017 to support the (subsequently) adopted Local Plan provides a detailed profile of the borough’s population including key health markers. In summary, the profile showed:

- Wyre has an aged and ageing population. Wyre has a larger proportion of its population over the age of 50 and a significantly lower proportion aged 20-39 compared to Lancashire, the North West and England. By 2041, the

population aged 65 or over in Wyre is projected to reach 40,700 – the largest number of any Lancashire authority.

- 26% of the population in Wyre were single (never married or never registered a same-sex civil partnership) at the 2011 Census. Lower than Lancashire (32%), the North West (36%) and nationally (35%).
- Wyre has much less ethnic diversity than Lancashire, the North West and England. A much higher proportion of the population than in the North West or in England were white at the 2011 Census.
- As of the 2011 Census, three quarters of the population in Wyre stated they were Christian which is higher than Lancashire (69%), the North West (67%) and nationally (59%).
- Wyre has relatively high rates of dementia, cardio-vascular disease and diabetes.
- There is a relatively high incidence of people whose day to day activities are restricted by some form of limiting long-term illness, unable to manage at least one self-care activity or will require help with at least one domestic task.
- There are differences in life expectancy across the borough - these generally correlate with areas of high deprivation.

8. Impact Assessment (Stage 4)

- 8.1 This impact assessment mimics the structure of the proposed revisions to the adopted Local Plan. For each policy subject to a revision the assessment provides a summary of the proposed revisions, summarises the policy intent, presents an assessment of potential impacts, including the identification of any actions arising, and identifies potential equalities and health impacts (positive, negative, neutral, no impact or unknown).

Policy: SP1 Development Strategy

Proposed Revision: To amend the minimum number of houses to be delivered over the plan period from 9,200 to 7,232 at part 3 of the policy. No other amendments to the policy are proposed.

Intent: Policy SP1 sets out the overall planning strategy for the Borough which aims to achieve improved economic performance whilst minimising or negating environmental impact. The policy promotes sustainable extensions to the towns and rural settlements. It establishes a settlement hierarchy and key principle that where possible higher order settlements become the focus of greater levels of development. It promotes a strategic policy of ensuring that the majority of development takes place within settlement boundaries, whilst introducing Strategic Areas of Separation designed to protect the identify and distinctiveness of particular settlements.

The proposed revision is a consequence of the adoption by the council of the government's Standard Method of calculating Local Housing Need. It is a lower figure than that in the adopted Local Plan. However, the development strategy as set out in the adopted Local Plan remains unaltered.

Assessment: The requirement to deliver less houses could have a negative impact on the number of affordable homes built and homes built for older people. Reducing the supply of housing for older people as part of larger housing developments (as required under Policy HP2) could impact on the ability of older people to move into newer housing more appropriate to their needs, with potential health implications. However, the partial review document does not amend the residential allocations and, in terms of supply, shows a higher number of homes planned to be built due to existing planning consents (see revision to Chapter 7: Housing, paragraph 7.2.2).

Equalities Impact: Neutral.

Health Impact: Neutral

Policy: SP4 Countryside Areas

Proposed Revision: To amend part five of the policy - which addresses the matter of the conversion of buildings that are in the countryside and *don't* meet the sustainability requirements of Policy SP2 – to allow for the subdivision of an existing residential building for residential use.

Intent: Policy SP4 applies to the countryside outside of the Green Belt and includes the Forest of Bowland. It takes a positive approach to the development of employment uses and rural businesses, rural affordable housing, sport and leisure and renewable energy. The policy also allows for the conversion of properties, under specified circumstances, for live/work units. The proposed revision is made to bring the policy in line with the National Planning Policy Framework 2021 §80d.

Assessment: Minor policy change which provides additional flexibility within the policy for the use of residential properties within the countryside. Allowing the sub-division of residential properties into smaller residential units may provide smaller properties for young people and small families and older people looking to downsize from a larger property. However, it is noted that part five addresses development in less sustainable locations. Increasing the supply of homes in less sustainable locations would count against objectives the seek to develop housing close to local services and as such would have a negative impact on those whose mobility is limited and those in higher need of accessible local services. Overall, the impact is expected to be neutral.

Equalities Impact: Neutral

Health Impact: Neutral

Policy: HP1 Housing Land Supply

Proposed Revision: To delete the existing policy and replace with a new policy. The new policy is re-titled “Housing Requirement and Supply”. The housing requirement position for the period 2011-2031 is amended from 9,200 dwellings to 7,232 dwellings. The latter comprising a minimum housing requirement of:

460 net additional dwellings per annum between 2011 and 2019; and

296 net additional dwellings per annum between 2019 and 2031.

Intent: Policy HP1 establishes the annual housing requirement for the plan period and also establishes the supply to be brought forward on allocated sites which remains unchanged at 5,192 dwellings.

Assessment: The revisions to the policy are a consequence of the council adopting the Government's Standard Method of calculating local housing need. The increase in housing supply over the plan period is a consequence of planning permission approvals. There is no change to the expected supply attributable to residential allocations made under policies SA1, SA3 and SA4.

Equalities Impact: No impact.

Health Impact: No impact

Policy: HP3 Affordable Housing

Proposed Amendment: Additional text in part 4 of the policy to allow the requirements of national policy and national planning guidance, including First Homes, to be material in the negotiation of the size, type, mix and tenure of affordable homes.

Intent: Policy HP3 establishes the need for all new residential developments to contribute to the provision of affordable housing. Part 4 clarifies that government policy will be a factor in negotiating the type of affordable housing provision. The proposed amendment specifically references the government's "First Homes" policy which is aimed at increasing the amount of owner occupied affordable housing proposed as part of new housing developments.

Assessment: The proposed change brings the policy in-line with the governments approach to the provision of affordable owner occupied housing. It does not change the total amount of affordable housing required. There may be a positive benefit for people wishing to access the owner occupied market at affordable levels.

Equalities Impact: Neutral.

Health Impact: Neutral

Policy: HP4 Rural Exceptions

Proposed Amendment: It is proposed to re-title the policy to read "Exception Sites". It is proposed to revise the content to insert a new part 3 to allow the

development of sites for First Homes and entry level homes outside of current allocations and where the criteria of part 3 are satisfied.

Intent: This proposed revision is a consequence of the introduction of the Government's First Homes initiative and their inclusion within the definition of affordable homes. The proposed revision ensures that the policy remains in accordance with national planning policy and extends the existing "exceptions" approach to affordable housing in rural areas to First Homes.

Assessment: Overall, the policy change could lead to an increase in the development of affordable housing in the borough and housing for older people. Although there could also be a loss of areas designated as countryside - as the policy wording allows for development of First Homes and entry-level housing outside of settlement boundaries – this is not likely to have significant equality or health impacts although it is appreciated that there may be a decline in amenity for existing residents whose property overlooks existing countryside.

Equalities Impact: Positive

Health Impact: Positive

Policy: EP5 Main Town Centre Uses

Proposed Amendment: It is proposed to remove the requirement for an impact assessment to be undertaken for office proposals at part 5b of the policy.

Intent: It is proposed to amend policy EP5 to ensure consistency with paragraph 90 of the NPPF 2021 regarding removal of the requirement for an impact assessment to be undertaken for office proposals.

Assessment: Minor technical revision to bring the policy in-line with national planning policy.

Equalities Impact: No impact.

Health Impact: No impact.

Policy: LPR1 Wyre Local Plan Review

Proposed Amendment: It is proposed to delete LPR1 which gives force to the partial review. Once the Wyre Local Plan Partial Review (2011-2031) is adopted the policy becomes redundant.

Intent: See above

Assessment: Technical change which has no equalities or health impact.

Equalities Impact: No impact.

Health Impact: No impact.

9. Recommendations (stage 5)

9.1 The proposed revisions to the Wyre Local Plan Partial review (2011-2031) are relatively minor in the context of the breadth of the Plan as a whole. The assessment above has concluded that the proposed revisions have either neutral or no impact. Consequently there are no recommendations to add over and above those previously made in the assessment for the adopted Wyre Local Plan.

10. Monitoring

10.1 There are no monitoring issues arising from the proposed revisions.

11. Conclusion

11.1 This EqHIA has reviewed a total of seven policies to understand whether any could singularly or cumulatively have a differential impact on health. It has found that most of the policies as written will have neutral or no impact and one policy dealing with affordable housing exception sites could have a positive impact by virtue of having the potential to increase the supply of affordable housing. The EqHIA has demonstrated that the proposed revisions are consistent with the policy outcomes listed at paragraph 3.4 above.