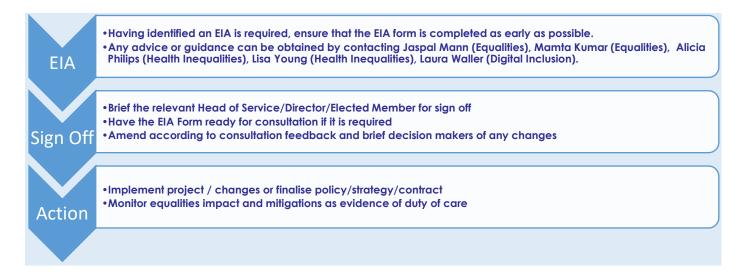
## **EQUALITY IMPACT ASSESSMENT (EIA)**



Title of EIA		Local Plan Review Issues and Options
EIA Author	Name	Clare Eggington
	Position	Planning Policy Manager
	Date of completion	09/06/2023
Head of Service	Name	Chris Styles
	Position	Head of Planning Policy & Environment
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities



#### PLEASE REFER TO EIA GUIDANCE FOR ADVICE ON COMPLETING THIS FORM

## SECTION 1 – Context & Background

#### 1.1 Please tick one of the following options:

This EIA is being carried out on:

□New policy / strategy

□New service

 $\boxtimes$  Review of policy / strategy

□ Review of service

Other project (*please give details*)



#### 1.2 In summary, what is the background to this EIA?

The Local Plan (including Coventry City Area Action Plan) was adopted in December 2017. Local Plan policies need to be reviewed once they are five years old to see whether they are still up to date. A full review of the Local Plan has commenced. The reviewed plan has to go through a statutory planning process which ultimately leads to the plan being examined in public by an independent Planning Inspector. This is an initial EIA of the issues being raised at the starting point of the review ('Regulation 18', or'Issues and Options') where we consider what policies might need updating, and any impacts which will need to be considered as the process of the review moves forward. We need to publicly consult on our initial views before producing final policy wording (which will be independently examined) The Local Plan covers a wide range of topics including health, levels and type of growth, jobs and economy, housing, town centres, communities, environment, design, heritage, transport and accessibility, environmental management, infrastructure.

At this stage of the plan review it is not possible to undertake detailed Equality Impact Assessment of each policy as we are gathering evidence and feedback on where we feel policies <u>may</u> need updating or where new policy may be needed (eg due to changes in national policy or local priorities). We will review responses after this initial consultation and this will include any feedback on equality and health impact matters which will need to be considered as the plan develops. Therefore this EIA and HIA provides a high level initial overview to help stimulate debate. The process of EIA and HIA and has been undertaken in discussion with the equalities and public health teams.

#### Overs a wide range of topics

1.3 Who are the main stakeholders involved? Who will be affected?

The local community and those delivering services in the area, landowners, developers and agents, special interest groups and organisations.

#### 1.4 Who will be responsible for implementing the findings of this EIA? Coventry City Council Planning Policy Service

#### **SECTION 2 – Consideration of Impact**

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:



- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not
- 2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to <u>https://www.coventry.gov.uk/factsaboutcoventry</u>)

The data analysis for the local plan has been prepared through a range of evidence base documents, for example:

- Housing and Economic Develoment Needs assessment which has been jointly prepared to cover • Warwickshire the Coventry and Housing Market Area (HMA), see https://www.coventry.gov.uk/downloads/file/39499/coventry-and-warwickshire-housing-andeconomic-development-needs-assessment-hedna- This covers demographic dynamics, overall housing need, affordable housing need, sizes and types of homes needed, specific housing market segments, housing needs of older people and people with disabilities. It uses the 2021 census as well as a range of other data sources.
- Gypsy and Traveller Accommodation Assessment addresses the specific needs of Gypsies and Travellers, reviews current policies and ensures that the reviewed plan provides for their future needs
- A series of topic papers to inform the review of the policy themes (which refer to a wide range of sources of evidence).
- Sustainability Appraisal
- 2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.
  - Positive impact (P),
  - Negative impact (N)
  - Both positive and negative impacts (PN)
  - No impact (NI)
  - Insufficient data (ID)

\*Any impact on the Council workforce should be included under question 2.6 – **not below** 



The Local Plan also includes a policy basis for social and community uses, which includes schools, universities and health centres.

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	Ρ	The review of the policies includes consideration of family housing provision, including affordable housing. 22.9% of children (0-15) live in relative low income families which is above the national average of 18.5% (2020/21 figures). The review ensures that infrastructure is aligned to development (eg schools, health, open space, walking and cycling networks) and supports the provision and retention of services such as community facilties and takes health issues into account for example healthy and active lifestyles. The review also includes a policy basis for social and community uses, which includes schools, universities and health centres.
Age 19-64	Ρ	The review of the policies includes supporting a range of different housing models to meet a variety of needs from people in this age group, including affordable housing, market housing, specialist housing, and a range of different models. How and where new development is located may affect different age groups in varying ways. The accessibility of new development may have implications for some people more than others and some age groups might be impacted more (or less) than others. For example, for older age groups, proximity of new housing and other development to services, such as health and social care, convenience shopping and community facilities may be especially important and/or the means to access these provisions safely and easily via public transport. Conversely, accessing quality jobs, training and education opportunities, as well as establishing a place on the property ladder, is more likely to be a key issue for younger people. Access to pre-school provisions, play areas and healthcare is likely to more important to households with young families. Although all age groups are likely to be impacted, the potential exists for some age groups to be impacted by local plan policies more than others.
Age 65+	Ρ	<ul> <li>The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-32 period include:</li> <li>A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth;</li> </ul>

# EQUALITY IMPACT ASSESSMENT (EIA)



		<ul> <li>A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems</li> <li>The review of Policy H8 (: Care Homes, Supported Housing, Nursing Homes and Older Persons Accommodation) considers the need for the growth in housing including sheltered / retirement housing, housing with care, and housing for wheelchair users.</li> <li>The review seeks to combat deprivation on a number of fronts. It looks to respond to growth in jobs within the city and manage any imbalance that may exist between the quality of jobs and housing. As well as planning for new housing growth the review also looks to set a new direction for new employment proposals and supports existing schemes (e.g. Friargate and Coventry gateway). It is also accepted that house building in itself creates jobs both through construction and knock on jobs through the supply chain etc. As such ensuring a varied supply of homes in all parts of the city informed by the HEELA will help spread jobs growth and opportunities. By looking to prioritise development within the existing urban area where possible, the plan also promotes urban regeneration through a previously developed land perspective can help with the removal of derelict and vacant sites that act as a blight within local communities. Instead turning them into sites for new homes or jobs or infrastructure. Indeed the review is proactive in planning for replacement employment land to facilitate urban regeneration and enhance the built environment. As part of the wider infrastructure aspect of the plan, it provides a policy basis for ensuring sufficient community and social provisions are provided alongside new development .This includes schools, community buildings and useable green spaces. It also seeks to ensure new developments are well connected and well integrated with their surroundings in order to help community cohesion.</li> </ul>
Disability	Ρ	For disabled people, isolation from services, public transport options and/or communities as well as an undersupply of more specialist or flexible types of housing can be a barrier to living independently and to health and wellbeing. There are a wide range of needs within this category, and it is recognised that the review of the Local Plan can play a role in helping to meet specific specialist needs, in providing an accessible, healthy and inclusive communities, open spaces, facilities and a public realm that is appropriate and accessibly for all who want to use them. The review of Policy H8 includes consideration of specialist accommodation needs and explores the possibility of adaptations



		and homes meeting higher building regulations standards where there is evidence of need. In terms of delivering housing the review considers the housing needs of the population as a whole. As part of the HEELA, evidence was developed around housing needs for those with disabilities and this is reflected through the plan and the policies. The accessibility policies are also aimed at including transport and access for all aspects of the population.
Gender reassignment	ID	The Equality Act provides protection for transgender people, defined as people who propose to, has started, or completed a process to change their gender. Local Plan policies should seek to respond to the needs of all in the community, avoid discrimination and support inclusivity. No direct impact although a range of policies will be applicable depending on individual / household circumstances
Marriage and Civil Partnership	ID	Married or civil partnership couples could potentially face barriers through the size of homes, access to suitable facilities and services. A lack of local economic opportunities could potentially force longer commutes to economic opportunities outside of the city.
Pregnancy and maternity	ID	A proportion of the population will be pregnant at any time and/or looking after babies and very young children. They may have health, socialisation and childcare requirements, including around access to pre- and post-natal care, childcare and health services. They may be more likely to be seeking affordable accommodation that is suitable for a young or growing family, with access to facilities, schools, and open spaces (including play areas). These needs have implications for how our environment, infrastructure, housing and communities are planned and are relevant to the review of the Local Plan. No direct impact although a range of policies will be applicable depending on individual / household circumstances.
Race (Including: colour, nationality, citizenship ethnic or national origins)	р	The Gypsy and Traveller policy is being reviewed to ensure that their needs can be met over the plan period and this is informed by a new Gypsy and Traveller Accommodation Assessment. However, more work could be done to understand other impacts on race and how policies could address these if there are particular issues arising as the result of further evidence.
Religion and belief	ID	People of different religions and faiths may face barriers to accessing suitable places of worship, which may have particular requirements in terms of location, space and built form/function. The review of the Local Plan can influence the protection and location of community facilities and services and can therefore influence opportunities for religious groups to practice their religion and



		worship. No direct impact although a range of policies will be applicable depending on individual / household circumstances
Sex	ID	The pattern and location of development may have some impacts with regard to gender. The lives of older women are often different to those of older men. On average, women live longer and are more likely to be working later in life and have lower incomes. These factors will also impact on how the review of the Local Plan can have regard to other protected characteristics (including Age and Disability).
		Traditionally, working-age women have been more likely to have varied working patterns compared to men, with one or more part- time jobs, and may leave the labour market earlier, perhaps to care for children. Therefore, the need for access to public transport, proximity to workplaces and the avoidance of isolated locations are all considerations in planning to meet the needs of women.
Sexual orientation	ID	No direct impact although a range of policies will be applicable depending on individual / household circumstances

### HEALTH INEQUALITIES

**2.3** Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.

Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity

A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities

Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.

If you need assistance in completing this section please contact: Alicia Philips or Lisa Young



	for more information. More details and worked examples can be found at cc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx
Question	Issues to consider
2.3a What HIs exist in relation to your work / plan / strategy	<ul> <li>Explore existing data sources on the distribution of health across different population groups (examples of where to find data to be included in support materials)</li> <li>Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation</li> </ul>
	Response:
	The local Plan evidence base calls upon a range of sources of information and a topic paper on health has been produced in conjunction with officers from the public health team to ensure that health issues are considered in the development of the Local Plan review. The Local Plan Regulation 18 document has also been subject to independent Sustainability Appraisal which also includes consideration of health in that context.
2.3b How might your	Consider and answer below:
work affect HI (positively or negatively). How might your work address the needs of different groups that share protected characteristics	<ul> <li>Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income</li> <li>Consider what the unintended consequences of your work might be</li> </ul>
	Response:
	<ul> <li>Potential outcomes including impact based on socio-economic status or geographical deprivation</li> </ul>
	As set out in the EIA above, the evidence and proposed policy changes take into account a range of needs to ensure that Coventry delivers the right types of development for a range of needs. Health is not just determined by individual and lifestyle factors but also the environment and communities in which we live, work and play. In the context of regeneration, the development of local areas can impact on their affordability for some groups. As a lower socioeconomic gradient is associated with poorer health



outcomes, this can lead to a worsening of health inequalities. The Local Plan review should not inadvertently widen health inequalities, but rather should seek to reduce them. This may require monitoring, particularly of impacts to deprived sectors of the population.

<u>Employment</u>: has a multitude of physical and mental health benefits such as increased self-rated physical health and mental health. The Local Plan review sets about many ways in which employment could be increased as a result of development, particularly in the building sector. The increase in office workspace in the city can have a positive impact, although is recommended to be considered alongside the rise in demand for home working due to the COVID-19 pandemic.

<u>Sustainable Transport</u>: is a key part of The Local Plan review linked directly to tackling the challenges associated with climatic changes. Increased use of public transport can result in improved air quality which has a multitude of health benefits. Poor air quality is associated with exacerbation of asthma, cardiovascular disease and other respiratory conditions. In Coventry, 93% of residents live within 600m of a bus stop and most bus routes head towards the city centre. With the Local Plan review making various references to improved bus infrastructure, there is huge potential for increased useability, resulting in improved accessibility and social connectedness for Coventry people. However, it is recognised that increases in the cost of public transport could have a detrimental impact to affordability of sustainable transport, with knock on impacts on mental health and wellbeing, and therefore should be avoided where possible.

Obesity: has been causally linked with several chronic diseases including diabetes, hypertension, stroke and certain forms of cancer. There is also increased risk of mortality with disproportionate impacts on those in a lower socio-economic position, those with disabilities and people with mental health problems. The 'obesogenic environment' refers to the role environmental factors play in determining nutritional and physical activity behaviours; and the obesogenicity of an environment is defined has the sum of influences that the surroundings, opportunities, or conditions of life have on promoting obesity in individuals or populations. Obesogenic environments are implicit our everyday lives. Modern advances in technology and design have resulted in increased sedentary behaviour and less movement, for example through desk-based jobs, escalator use over stair use, and home deliveries over in person shopping. The Local Plan review includes policies to increase active travel modes of walking and cycling thereby supporting mode shift through reference to traffic dominance and policies to shift design and management of streets to incorporate cycle lanes and safer walkways. However, infrastructure needs to be complemented by continual work to encourage, enable and facilitate walking and cycling within communities partially through behaviour



change initiatives. Benefits of such initiatives include improved mental health and social connectivity, cleaner air, safer streets enabling children to play and less sedentary lifestyles. The COVID-19 pandemic may have resulted in people having increased unstructured time confined to their homes, and higher levels of stress and anxiety which are associated with overeating. Availability, access and promotion of certain foods, particularly those high in fat, sugar and salt (HFSS) facilitate increased consumption of unhealthy food, which further contributes to obesity. More needs to be done to limit access to these foods, or increase availability, access and affordability of healthy foods especially in at-risk populations. It is with these considerations that it is recommended that spaces are designed with evidence of limiting further creation of obesogenic environments.

<u>Housing</u>: the negative health impacts on housing include physical effects from mould, cold homes, internal air quality, overcrowding and mental health effects such as depression and anxiety. Poor housing can limit an individual's ability to reach their potential and living in areas with high crime, low green space and litter can have adverse impacts on ability to exercise outdoors and people's sense of belonging. Adequate energy efficiency and insulation of homes is essential for reducing heating costs and limiting negative environmental impact. The Local Plan review will have bespoke targets to make new homes as accessible as possible, this will be positive for the high proportion of people with disabilities in Coventry.

Communities: a sense of belonging with one's neighbourhood has positive impacts for wellbeing. This forms part of the Index of Multiple Deprivation (IMD). An increased sense of belonging can improve deprivation and therefore health and wellbeing. This is a theme that comes through strongly in the Local Plan review with policies seeking to uplift areas by facilitating community cohesion and civic engagement. Design principles to create good quality, sustainable, inclusive and accessible places to live, work and play are referenced throughout the Local Plan review. Creating public spaces that encourage social interaction can have positive impacts on mental and physical health. It is recognised that continual assessment of need through community participation is crucial, particularly considering inward migration into the city and changing population dynamics. Equally, adherence to design principals is key, with due consideration for different population groups including for example, people with limited mobility or people living with dementia, to support them in leading more fulfilling lives. While there are negative impacts of building on green space, Local Plan review policies indicate mitigations for this in line with NPPF guidance to make as much use as possible of previously developed land or brownfield land and to include green space in new developments. Equally, the commitment to working with communities and community groups through means such as neighbourhood plans shows willingness for citizen-led participation.



<u>Affordability</u>: the Marmot Review highlighted that financial deprivation can be a barrier to living healthier lives. The current cost of living crisis therefore will inevitably impact many people across Coventry, particularly those who are already facing financial challenge. While costs fall outside the parameters of a Local Plan review, the reduction in disposable income, and its impact on paying for homes and heating, food and travel, and other necessities, and its inevitable impact on health and wellbeing, cannot be ignored. The Local Plan review seeks to mitigate these issues where possible through for example, creating a proportion of affordable homes and supporting infrastructure for active travel. It is recommended that these aspects, particularly the need for affordable housing and use of viability loophole, is continually monitored to prevent people living in overcrowded and unsafe conditions as much as possible.

b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.

This HIA has assessed the Local Plan review impacts on lifestyles, social and community influences, living and environment conditions, access and quality of services and macro-economic environment and sustainability factors. The Local Plan review isuues and options (Reg 18) version is being written at a time where the country is recovering from the COVID-19 pandemic, with opportunities to implement learnings to 'build back fairer'. Throughout 2023 comes with fears of increasing interest rates; a rise in the energy cap; higher house prices; increased taxation and inflation without concurrent pay rises. It is in the midst of this, the Local Plan review is able to facilitate improvement in the health of the population of Coventry by using its influence to mitigate risks and create an environment in which all citizens can flourish. While the Local Plan review policies guide the design and infrastructure of future developments, it is recognised that complementing this work with behaviour change initiatives, engaging with communities and coproducing with communities will enable consideration of health impacts on all of Coventry's people to remain a priority.

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

The Health policy of the Local Plan, which requires major planning applications over a certain threshold to undertake Health Impact assessment is proposed to be strengthened and this will impact on proposals for housing development in the future to ensure that health matters are taken into account. As the policies of the plan are developed in more detail (after consultation feedback), this will include an updated Health Impact Assessment to update the assessment undertaken for the original Local Plan



review and ensure that the policies take health matters into account before their proposed wording is finalised.

Throughout the Regulation 18 Draft Local Plan review, there are multiple references to creating good quality, long lasting, and accessible homes and developments. Alongside this, the minimisation of climate impacts is commendable as is the celebration of our city's unique heritage, and this is linked to a stronger and more connected community identity which is conducive to good mental health and wellbeing. Retaining places of worship and cultural spaces will also further reinforce identity and connectedness in the city. The reference to both physical and mental health within the Plan is noted and considered important to contribute to the parity of esteem. Furthermore, due consideration of mitigation of unavoidable negative health impacts are also apparent throughout the given policies. Given the above, the recommendations for Planning colleagues generally refer to making more explicit reference to both positive and negative health impacts and given mitigations. This seeks to support colleague's efforts in showing due consideration to health in the Local Plan. Other recommendations seek to account for or emphasise health issues brought to the forefront through the covid-19 pandemic and minimise risk of inadvertently widening the inequality gap.

### **DIGITAL INCLUSION**

2.5 The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English (NHS Digital.)

Some of the barriers to digital inclusion can include lack of:

- Access to a device and/or data
- Digital skills
- Motivation to get online
- Trust of online safety

Digital exclusion is not a fixed entity and may look different to different people at different times.

Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.



Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.

Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.

It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work.

Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.

If you need assistance in completing this section please contact: Laura Waller (*Digital Services & Inclusion Lead, CCC*). More details and worked examples can be found at

https://coventry	cc.sharepoint.com/Info/Pages/What-is-an	-Equality-Impact-Assessment-(EIA).aspx
Question	Issues to consider	
2.5 What digital inequalities exist in relation to your work / plan / strategy?	<ul> <li>Does your work assume service users</li> <li>Do outcomes vary across groups, for e the least compared to those who have</li> <li>Consider what the unintended consection</li> </ul>	example digitally excluded people benefit e digital skills and access?
	range of ways including non-digital meth which details the standards associated v	e will engage with local communities in a nods. This can be viewed on our website
2.5b How will you mitigate against digital inequalities?	organisations to improve digital skills available if someone is unable to acce	e registration you may work with partner and ensure equitable processes are
	Response: we use a variety of methods to publicise accessible formats, provide hard copies the adopted SCI, 2021:	•



https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/8

#### 2.6 How will you monitor and evaluate the effect of this work?

We are required to monitor Local Plan policy in line with government requirements, and we will review our monitoring targets as we progress the plan review to ensure they are fit for purpose and are delivering as intended. The existing Local Plan already includes monitoring indicators and these will be reviewed and updated as necessary to ensure continuity. However, there is scope to improve the monitoring process and we will be looking at this in more detail as the review is progressed through the regulatory process.

#### 2.7 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

#### Headcount:

#### Sex:

Female	
Male	

#### **Disability:**

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

### Ethnicity:

#### Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

#### **Religion:**

Any other	
Buddhist	
Christian	
Hindu	



White	
Black, Asian, Minority	
Ethnic	
Prefer not to state	
Unknown	

Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

## Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

## 3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:
No impact has been identified for one or more protected groups
Positive impact has been identified for one or more protected groups
Negative impact has been identified for one or more protected groups
Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Service:	Date: 09/06/2023
Chris Styles	
Name of Director:	Date sent to Director: 09/06/2023
Andrew Walster	
Name of Lead Elected Member:	Date sent to Councillor:
Cllr D Welsh	Appendix to Local Plan Reg 18 Cabinet report 11 July 2023



Email completed EIA to <a href="mailto:equality@coventry.gov.uk">equality@coventry.gov.uk</a>