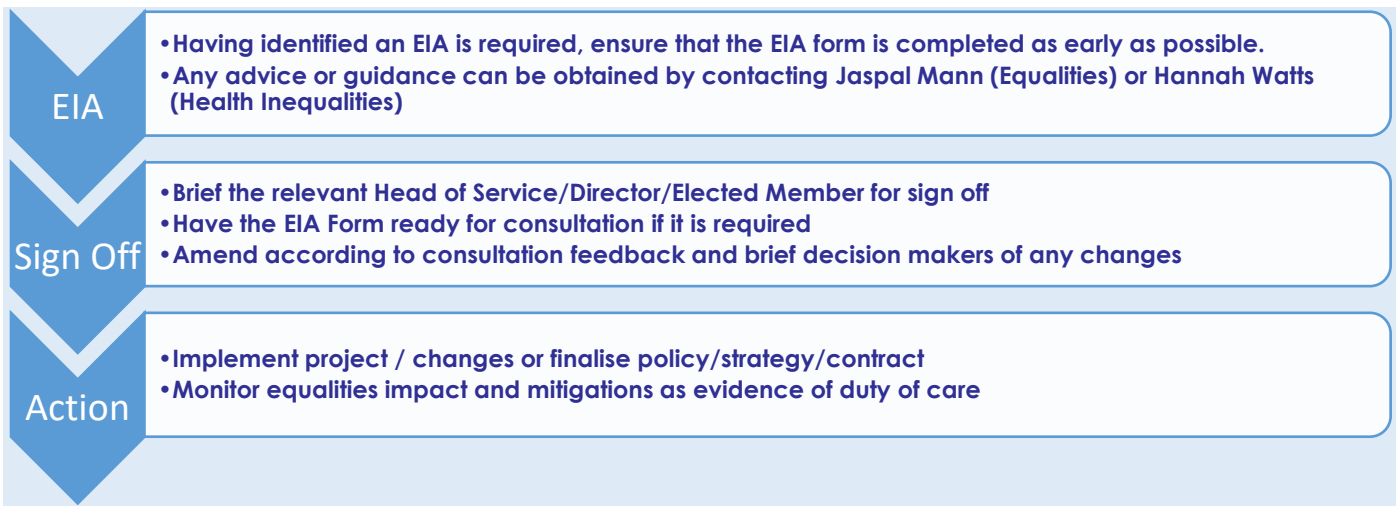


EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Coventry Local Plan Review Proposed submission (Regulation 19)
EIA Author	Name	Rob Haigh
	Position	Senior Planning Policy Officer
	Date of completion	01 October 2024
Head of Service	Name	Rob Back
	Position	Strategic Lead - Planning
Cabinet Member	Name	Councillor Naeem Akhtar
	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
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (*please give details*) *Coventry Local Plan Review – Proposed Submission*



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

The Coventry Local Plan (incorporating the City Centre 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 Coventry Local Plan formally commenced in 2023 with the publication of the Regulation 18 Issues and Options¹. The review of the Coventry Local Plan has to go through a statutory planning process which ultimately leads to the plan being examined in public by an independent Planning Inspector.

The Local Plan, City Centre Area Action Plan and existing Neighbourhood Development Plan (Willenhall) together form the statutory development plan for the city, which is used, alongside the National Planning Policy Framework, to help direct decisions on planning applications in Coventry. The reviewed Local Plan, once adopted, will provide an updated planning policy framework needed to guide development up to 2041.

Given the scope of the reviewed Local Plan in terms of geographical extent (citywide), range of policy content, and timespan (up to 2041) it has the potential to affect many people who will live and work in the city, and who will visit the city, over the plan period. As such, the content of the document will be relevant to the Public Sector Equality Duty, as set out above, and for this reason an EqIA of the Coventry Local Plan review is required. However, as the plan primarily relates to the use and development of land and seeks to address people's needs in relation to how land is used (i.e. for homes, employment, transport, services and facilities and to provide a safe and healthy environment), the beneficial effects of policies in the plan are largely focused on those 'protected characteristics' and other relevant characteristics that can act as barrier to those needs being met. These include deprivation, disability, age and race. Other 'protected characteristics' are less relevant, such as gender reassignment, pregnancy and maternity, religion or belief, sexual orientation, and marriage or civil partnership, but would still be subject to beneficial effects as the policies are designed and written to address the needs of everyone.

This EqIA of the publication draft (Regulation 19) has included a comprehensive update of many policies and so any potential impacts need to be considered accordingly. Consultation on the publication draft before proceeding to submission for the purposes of Examination is required (which will be independently examined). The Local Plan covers a wide range of topics including: -

- Health
- Employment
- Housing
- Retail
- Communities
- Green Belt and Green Space
- Access and Movement
- Environmental Management
- Design

¹ <https://coventrycitycouncil.inconsult.uk/CLPRIO/consultationHome>

EQUALITY IMPACT ASSESSMENT (EIA)



- Conservation and Heritage and
- Infrastructure.

We have reviewed the responses after the initial consultation of the Local Plan Review (Regulation 18) which included any responses to the associated EqIA that was published at that time. Therefore, this EqIA and Health Impact Assessment provides a high level assessment of the various policy areas highlighted above based on the protected characteristics.

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. This is due to the fact that the Local Plan considers development throughout the whole city and will affect everyone who lives and works in Coventry.

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 <https://www.coventry.gov.uk/factsaboutcoventry>)

The data analysis for the local plan has been prepared through a range of evidence base documents and whilst not totally exhaustive, these include, for example:

EQUALITY IMPACT ASSESSMENT (EIA)



- Housing and Economic Development Needs Assessment (HEDNA) (2022) and Addendum Report (2024): Prepared on behalf of the Coventry and Warwickshire Local Authorities to provide a joint and integrated assessment of the need for housing, economic growth potential and employment land needs over the period to 2041 and 2050.
- Housing and Economic Land Availability Assessment (HELAA) (2024): A technical assessment which seeks to identify land which is suitable, available and achievable for housing and economic development over the Local Plan Period. The HELAA does not allocate land for development or determine the acceptability of any site for development, instead this assessment is an important source of evidence for deciding where new housing/economic development may be located.
- Gypsy and Traveller Accommodation Assessment (2023) - 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 background papers to inform the review of the policy themes (which refer to a wide range of sources of evidence).
- Strategic Flood Risk Assessment (SFRA) Level 1 (2022)
Evidence base on flood risk issues to support the review and update of the Coventry and Warwickshire Authorities Local Plans and associated Planning Policy documents.
- Coventry Employment Land Review and office market addendum (2024)
- Green Belt Technical Update (2024)
- Carbon Policy Report (2024): Specialist report assessing options available within the local planning system to address climate change in Coventry informing local plan policy.
- Sustainability Appraisal
- Viability Appraisal (2024): comprehensive whole Local Plan Viability Assessment that demonstrates viability of the policies set out in the Local Plan.
- Coventry and Warwickshire Water Cycle Study 2024

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*

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
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EQUALITY IMPACT ASSESSMENT (EIA)



<p>Age 0-18</p>	<p>P</p>	<p>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% (2022/23 figures). The review ensures that infrastructure is aligned to development (e.g. schools, health, open space, walking and cycling networks) and supports the provision and retention of services such as community facilities. The review also addresses the known health issues and challenges into account by promoting and encouraging healthy and active lifestyles.</p> <p>The review also includes a policy basis for social and community uses, which includes schools, universities, places of worship and health centres which all help this cohort to live a healthy and fulfilled upbringing.</p>
<p>Age 19-64</p>	<p>P</p>	<p>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.</p> <p>The delivery of high quality affordable housing will help to support all people whose needs are not met by the housing market. These will include all people on the city's housing register. Affordable housing will include housing for rent below market levels and housing for sale that provides a subsidised route to home ownership. The level of affordable housing need is determined by the Local Housing Needs Assessment and the level of affordable housing that can be delivered through the planning system will be determined by the viability of development and the level of public subsidy (if any) available.</p> <p>In association with affordable housing, 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</p>

EQUALITY IMPACT ASSESSMENT (EIA)



		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+	P	<p>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:</p> <ul style="list-style-type: none"> - A 18% increase in the population aged 65+ (potentially accounting for 54% of total population growth; - A 21% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems <p>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.</p> <p>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), which is relevant to this cohort given some people aged 65+ choose to continue working with research suggesting this trend becoming more prevalent². 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 HELAA 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</p>

2

[https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/peopleaged65yearsandoverinemploymentuk/januarytomarch2022toapriltojune2022#:~:text=and%20employment%20types-,In%20April%20to%20June%202022%2C%20the%20number%20of%20people%20aged,record%20level%20\(Figure%201\).](https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/peopleaged65yearsandoverinemploymentuk/januarytomarch2022toapriltojune2022#:~:text=and%20employment%20types-,In%20April%20to%20June%202022%2C%20the%20number%20of%20people%20aged,record%20level%20(Figure%201).)

EQUALITY IMPACT ASSESSMENT (EIA)



		<p>employment land to facilitate urban regeneration and enhance the built environment.</p> <p>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.</p>
Disability	P	<p>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.</p> <p>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.</p> <p>As part of the HEDNA, 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.</p>
Gender reassignment	NI	<p>The Equality Act provides protection for transgender people, defined as people who propose to have 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.</p>
Marriage and Civil Partnership	NI	<p>Those within this category are not considered to be affected differently by the policies within the Local Plan. As such, the Local Plan is considered no impact with respect to equality issues relating to marriage and civil partnerships.</p>

EQUALITY IMPACT ASSESSMENT (EIA)



Pregnancy and maternity	NI	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)	NI	<p>The Local Plan policies, proposal and allocations aim to ensure that sites are available to provide sufficient housing to meet a significant proportion of housing needs of all groups in Coventry.</p> <p>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.</p>
Religion and belief	NI	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	NI	<p>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, on a like for like comparison with men, have lower average 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).</p> <p>Traditionally, working-age women have been more likely to have varied working patterns compared to men, with one or more parttime 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</p>

EQUALITY IMPACT ASSESSMENT (EIA)



		isolated locations are all considerations in planning to meet the needs of women.
Sexual orientation	NI	No direct impact although some policies will be applicable depending upon the individual / household circumstances.



Method

2.3 The Regulation 19 Coventry Local Plan Review has been reviewed to consider the likely impacts of the 73 policies on each of the nine protected characteristics from the Equality Act 2010 listed above and the findings are shown in table 1 below. 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.

2.4 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

2.5 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 into account of the needs, circumstances and experiences of those in the community who it intends to benefit from a policy.

2.6 The Local Plan Review includes numerous different policies. This equality impact assessment considers the potential for disproportionate impacts and opportunities for advancing equality of opportunity and fostering good relations in respect of the Local Plan Review. However, this does not negate the need to consider individual policies in greater detail in relation to the wider corporate aims. The approach has been to undertake a high-level assessment in partnership with individual service areas on policy areas which are likely to impact on people with different protected characteristics. The aim of this is to identify key areas of focus and where a more detailed individual equality impact assessment on a specific policy, undertaken by the service area is likely to be required. In order to achieve positive equalities outcomes, there will be an on-going commitment from all service areas involved to assess and, where they exist, to mitigate, disproportionate impacts on particular protected characteristics. This will be an on-going duty and should be given proportionate attention according to the relevance at various stages.

EQUALITY IMPACT ASSESSMENT (EIA)



Table 1 Likely effects of the policies in the Coventry Local Plan Review (Regulation 19) on the nine protected characteristics under the Equality Act 2010

Policy	Age	Disability	Gender reassignment	Marriage & civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy DS1: Overall Development Needs	+	+	+	+	+	+	+	+	+
Policy DS2: The Duty to Co-operate and partnership working	0	0	0	0	0	0	0	0	0
Policy DS3: Sustainable Development Policy	0	0	0	0	0	0	0	0	0
Policy DS4 (Part A) – General Masterplan principles	0	0	0	0	0	0	0	0	0
Policy DS4 (Part B) - Whitley Specific Masterplan Principles	0	0	0	0	0	0	0	0	0
Policy DS4 (Part C) – Keresley SUE Specific Masterplan Principles	0	0	0	0	0	0	0	0	0
Policy DS4 (Part D) – Eastern Green SUE Specific Masterplan Principles	0	0	0	0	0	0	0	0	0
Policy HW1: Health and Health Impact Assessments (HIA)	+	+	+	+	+	+	+	+	+
Policy JE1: Overall Economy and Employment Strategy	+	+	+	+	+	+	+	+	+
Policy JE2: Provision of Employment Land and Premises	0	0	0	0	0	0	0	0	0
Policy JE3: Non-Employment Uses on Employment Land	0	0	0	0	0	0	0	0	0
Policy JE4: Location and type of Office Development	0	0	0	0	0	0	0	0	0
Policy JE5: Industrial and Storage / Distribution Development	0	0	0	0	0	0	0	0	0
Policy JE6: Tourism/Visitor Related Development	0	0	0	0	0	0	0	0	0
Policy JE7: Accessibility to Employment Opportunities	+	+	+	+	+	+	+	+	+
Policy JE8: Location of Research and Development (R&D)	0	0	0	0	0	0	0	0	0
Policy H1: Housing Land Requirements	0	0	0	0	0	0	0	0	0
Policy H2: Housing Allocations	0	0	0	0	0	0	0	0	0
Policy H3: Provision of New Housing	+	+	+	+	+	+	+	+	+
Policy H4: Securing a Mix of Housing	+	+	+	+	+	+	+	+	+

EQUALITY IMPACT ASSESSMENT (EIA)



Policy H5: Managing Existing Housing Stock	0	0	0	0	0	0	0	0	0
Policy H6: Affordable Housing	+	+	+	+	+	+	+	+	+
Policy H7: Gypsy and Traveller Accommodation	+	+	+	+	+	+	+	+	+
Policy H8: Specialist Housing including with elements of care, Older Persons accommodation and hostels	+	+	+	+	+	+	+	+	+
Policy H9: Residential Density	0	0	0	0	0	0	0	0	0
Policy H10: Student Accommodation	+	+	+	+	+	+	+	+	+
Policy H11: Homes in Multiple Occupation (HMOs)	+	+	+	+	+	+	+	+	+
Policy H12 – Build to Rent	+	+	+	+	+	+	+	+	+
Policy H13 – Co-living	+	+	+	+	+	+	+	+	+
Policy R1 Delivering Retail Growth	0	0	0	0	0	0	0	0	0
Policy R2: Coventry City Centre – Development Strategy	0	0	0	0	0	0	0	0	0
Policy R3: The Network of Centres	0	0	0	0	0	0	0	0	0
Policy R4: Out of Centre Proposals	0	0	0	0	0	0	0	0	0
Policy R5: Retail Frontages and Ground Floor Units in defined centres	0	0	0	0	0	0	0	0	0
Policy R6 Restaurants, Bars and Hot Food Takeaways	+	+	+	+	+	+	+	+	+
Policy CO1: New or improved social community and leisure premises	+	+	+	+	+	+	+	+	+
Policy CO2: Re-Use of or Redevelopment of Facilities	+	+	+	+	+	+	+	+	+
Policy CO3: Neighbourhood and Community Planning	+	+	+	+	+	+	+	+	+
GB1 Green Belt	0	0	0	0	0	0	0	0	0
Policy GB2: Safeguarded Land in the Green Belt	0	0	0	0	0	0	0	0	0
LGS1 Local Green Space	+	+	+	+	+	+	+	+	+
Policy GE1 Green and Blue Infrastructure	+	+	+	+	+	+	+	+	+
Policy GE2: Green Space	+	+	+	+	+	+	+	+	+
Policy GE3: Biodiversity, Geological, Landscape and Archaeological Conservation	+	+	+	+	+	+	+	+	+
Policy GE4: Tree Protection	+	+	+	+	+	+	+	+	+
Policy DE1 Ensuring High Quality Design	0	0	0	0	0	0	0	0	0

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Policy DE2: Delivering High Quality Places	+	+	0	0	0	0	0	+	0
Policy HE1 Conservation Areas	0	0	0	0	0	0	0	0	0
Policy HE2: Conservation and Heritage Assets	0	0	0	0	0	0	0	0	0
Policy HE3 Heritage Park – Charterhouse	0	0	0	0	0	0	0	0	0
Policy HE4: Archaeology	0	0	0	0	0	0	0	0	0
Policy AC1: Accessible Transport Network	+	+	+	+	+	+	+	+	+
Policy AC2: Road Network	0	0	0	0	0	0	0	0	0
Policy AC3: Demand Management	0	0	0	0	0	0	0	0	0
Policy AC4: Active Transport Provision including Walking, Cycling and Micro Mobility	+	+	+	+	+	+	+	+	+
Policy AC5: Bus, Demand Response Transit and Rapid Transit	+	+	0	0	0	0	0	0	0
Policy AC6: Rail	0	0	0	0	0	0	0	0	0
Policy AC7: Freight	0	0	0	0	0	0	0	0	0
Policy EM1: Planning for Climate Change Adaptation	+	+	0	0	0	0	0	0	0
Policy EM4 Flood Risk Management	+	+	0	0	0	0	0	0	0
Policy EM5 Sustainable Drainage Systems (SuDS)	0	0	0	0	0	0	0	0	0
Policy EM6 Redevelopment of Previously Developed Land	0	0	0	0	0	0	0	0	0
Policy EM7 Air Quality	+	+	+	+	+	+	+	+	+
Policy EM8 Waste Management	0	0	0	0	0	0	0	0	0
Policy EM9 Safeguarding Mineral Resources	?	?	?	?	?	?	?	?	?
Policy EM10 Non Mineral Development in Mineral Safeguarding Areas	?	?	?	?	?	?	?	?	?
Policy EM11 Net zero operational carbon new build residential development	+	+	+	+	+	+	+	+	+
Policy EM12 Net zero (regulated operational carbon) new build non-domestic development	0	0	0	0	0	0	0	0	0
Policy EM13 Overheating in new buildings	+	+	+	+	+	+	+	+	+
Policy EM14 Embodied carbon and waste	0	0	0	0	0	0	0	0	0
Policy EM15 Noise	+	+	+	+	+	+	+	+	+
Policy IM1: Developer Contributions for Infrastructure	0	0	0	0	0	0	0	0	0
Policy CC1: City Centre	+	+	+	+	+	+	+	+	+



Conclusion

- 2.7 The EqIA has examined whether the Regulation 19 Coventry Local Plan Review policies would have an adverse impact on or discriminate against different groups in the community with specific consideration to groups identified under the nine protected characteristics as identified in the Equalities Act 2010.
- 2.8 The assessment identified that all policies within the Local Plan are likely to have either a positive 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.
- 2.9 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. In addition, the specific Articles of the ECHR relevant to planning including Article 6 (Right to a fair and public trial within a reasonable time), Article 8 (Right to respect for private and family life, home and correspondence), Article 14 (Prohibition of discrimination) and Article 1 of Protocol 1 (Right to peaceful enjoyment of possession and protection of property) have been considered as part of the assessment undertaken in this EqIA document.
- 2.10 The Council will monitor the implementation and impact of the Local Plan policies through the production of its Annual Monitoring Report (AMR).



HEALTH INEQUALITIES

<p>2.11</p>	<p>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.</p> <p>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</p> <p>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</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
<p>Question</p>	<p>Issues to consider</p>	
<p>2.12a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> • Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation 	
	<p>Response: The local Plan evidence base calls upon a range of sources of information and a background 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 19 document has also been subject to independent Sustainability Appraisal which also includes consideration of health in that context.</p>	
<p>2.13b How might your work affect HI</p>	<p>Consider and answer below:</p>	

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<p>(positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<ul style="list-style-type: none"> • 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 • Consider what the unintended consequences of your work might be
	<p>Response:</p> <p>a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>Coventry became a Marmot City³ in 2013 and is committed to reducing inequality and improving health outcomes for all. Since 2019, the key focus is on children and young people, and following the impact of Covid19 on the city, also prioritising the effect on ethnic minority group communities. Healthy ageing is a challenge throughout England and the provision of good quality housing and access to employment is well established as contributing to better health and wellbeing – physical and mental.</p> <p>The effectiveness of reducing health inequalities is likely to be associated with the location of new development. In consideration of the land constraints in Coventry, the higher levels of housing are likely to be difficult to accommodate - homes may need to be small, more densely located and thus less able to meet the variety and adaptability of needs. Such levels of housing would also place pressures on the capacities of the open/green spaces in the city and thus, limit the health and wellbeing associated with such spaces.</p> <p>As set out in the EqIA 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 communities. As a lower socio-economic 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.</p>

³ www.coventry.gov.uk/policy-1/coventry-marmot-city



Employment: 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 respect of the new build sector. The increase in office workspace in the city can have a positive impact, although it is recommended to be considered alongside the rise in demand and popularity of home/agile working. This needs to be reflected in how the relevant policies are developed particularly in relation to office space demand and forecasting for such realities.

Sustainable Transport: 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, albeit the applicable Local Plan Review policies have no control on public transport pricing.

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 as 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 modal 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 directly through policy but also indirectly 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.

Housing: the potential negative health impacts of housing include sub standard internal and/or external conditions due to a variety of factors such as physical effects from mould, poor insulation/ventilation, internal air quality and overcrowding. Mental health effects such as depression and anxiety can also occur as a result of the physical effects. Poorly designed and built housing can limit an individual's ability to reach their potential and living in areas with high crime, lack of access to green and blue space coupled with litter can have adverse impacts on individuals abilities to choose to exercise outdoors. Adequate energy efficiency and insulation of homes is essential for reducing heating costs and limiting negative environmental impact. The Local Plan review will introduce bespoke targets through policies EM11, EM12, EM13 and EM14 to make new homes as sustainable as possible for all sections of the community.

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.

Affordability: 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 the 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 publication draft (Reg 19) version is being written at a time where the country is in a post COVID-19 pandemic recovery, with opportunities to implement learnings to 'build back fairer'.

Policy JE1 seeks to provide economic growth and jobs. The policy would ensure a sufficient quantum of development opportunities are provided to meet the demand for economic growth and support the diversification of Coventry's economy. This will be beneficial in increasing employment opportunities for people who are currently unemployed.

Policy JE5 aims at providing Local Employment Areas characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees. This will provide the needed local employment opportunities for people with lower qualifications.

Policy JE7 recognises that economic transformation cannot be achieved without new skills and training in the workforce. The policy seeks to ensure initiatives that provide training opportunities to assist residents in accessing employment opportunities are secured. Also, support will be provided to residents in applying for jobs arising from development. These policy approaches could potentially bring benefits for residents in deprived areas where low qualifications are barriers for gaining employment.



Policy H6 seeks to secure a percentage of affordable housing depending on the local housing values and land type with a percentage of new affordable homes required to be in accordance with the PPG. This policy is important in ensuring the housing needs of households of lower income are met and this will help to reduce inequalities. The policy also seeks to ensure that all new homes including affordable homes adhere to the design standards requirements and accords with the requirements for good design. Poor housing quality negatively impacts general health and wellbeing. As such, this policy is important in addressing health conditions associated with poor housing quality.

Additionally, other policies in the in the Plan such as Policy GE1 relating to green and blue infrastructure and Policy GE3 relating to nature conservation helps in addressing health inequalities.

Throughout the plan preparation period (2022-to date), there have been numerous challenges, supported by empirical evidence of increasing interest rates, a rise in the energy cap, higher average house prices, fluctuating levels of irregular migration⁴, social unrest⁵, taxation and inflation without concurrent pay rises. 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 location of future new build developments, it is recognised that individual behaviour changes are required to help improve one's own health.

2.14 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 review, which requires major planning applications over a certain threshold to undertake Health Impact assessment has been strengthened and this will impact on proposals for different development typologies in the future to ensure that health matters are appropriately considered. The policies that have been reviewed in the Local Plan have been developed in more detail (after consultation feedback) and include an updated Health Impact Assessment to update the assessment undertaken for the adopted Local Plan and ensures that the policies take health matters into account. Throughout the review process, there are multiple references to creating good quality, long lasting, and accessible homes and developments.

⁴ <https://www.gov.uk/government/statistics/irregular-migration-to-the-uk-year-ending-june-2023/irregular-migration-to-the-uk-year-ending-june-2023>

⁵ <https://commonslibrary.parliament.uk/policing-response-to-the-2024-summer-riots/>



Alongside this, the mitigation of projected climatic change impacts through the introduction of new policies EM11, EM12, EM13 and EM14 is welcomed. Aligned to this new policy approach is the strengthening and celebration of the 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 together with the strengthening of blue and green infrastructure policies.

The reference to both physical and mental health within the Plan is noted and considered important to help improve overall levels of health within Coventry. Furthermore, due consideration of mitigation of unavoidable negative health impacts are also apparent throughout the reviewed policies. Given the above, the recommendations for policy is to make more explicit reference to both positive and negative health impacts and any appropriate mitigations. This seeks to support policy development in giving due consideration to health matters in the Local Plan Review. 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 gaps that already exist across the city.

2.15 Thinking of the main aims of your work area that this EIA is for; does your work area impact digital inequalities or exacerbate them? Does your work assume service users have digital access and skills? Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? Consider what the unintended consequences of your work might be.

The Review of the Coventry Local Plan will, directly and indirectly have a positive impact on reducing digital inequalities. Directly, this will occur through the continued positive promotion and encouragement of new or improved social and community facilities through policies CO1-3. In providing social, community and leisure services the provision and use of shared spaces, community facilities (such as meeting and sports venues, cultural buildings and places of worship) and other local services to enhance the sustainability of communities and residential environments. In doing so many, if not all of these facilities will have public internet access, for example in all community libraries across the city, members of the community can access online services at no personal cost to themselves other than through their required Council Tax payments.

Indirectly, policy IM1 sets out the approach to developer contributions for infrastructure and it is recognised that the delivery of infrastructure to support digital inclusion through improved telecommunications that will require a partnership approach. The Council has an important role to play in setting the level of and securing developer contributions that will help to deliver the necessary digital infrastructure to support development and growth. In line with its role and responsibilities, the Council will have a lead role in coordinating and delivering infrastructure in Coventry to support growth.



2.16 Where are the opportunities for your area to reduce digital exclusion inequalities and embed supports/interventions as part of your work? If any digital inequalities are identified how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.

A digitally accessible city will allow people enhanced freedom of choice about where and how they work, how they interact with services and facilities and how they promote and operate their businesses. The Local Plan Review will also support the city centre and its role within Coventry's electric city initiatives and its position as a Gigabyte City. A connected community is a more sustainable one, as it represents the opportunity for a reduction in car-based commuting and a commensurate reduction in carbon outputs and traffic congestion. It also promotes Coventry as a suitable place for high technology activities and employment to take place, especially in accordance with the growth and continued success of the city's two universities.

Despite the nationwide installation programmes of major suppliers there is a genuine risk that gaps will continue to remain within the market, especially within new developments that grow and expand the existing urban area. Indeed, the Council is aware of recent developments across Coventry where superfast broadband has been installed from the outset and as a result is helping residents directly access online services. Telecommunications infrastructure will continue to be of great importance through incorporating such provisions at the initial development stage. It also highlighted that within predominantly urban areas where existing networks can be connected and enhanced the cost of delivering such provisions is highly unlikely to have an impact on development viability when delivered from the outset in partnership with a specific provider. Through this Local Plan Review, the Council will continue to support and encourage through its policies ultra-fast broadband connectivity and will therefore aim to support the delivery of ultrafast broadband to throughout the plan period. Any opportunity to accelerate or increase connectivity across Coventry will be supported at every opportunity.

Finally, the way we engage, involve and consult with communities as we progress the Local Plan Review in line with the Statement of Community Involvement (SCI) recognises the issue of digital inclusivity. The SCI sets out how we engage, consult and involve through a range of mediums both digitally and in person.

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

The Local Plan already includes monitoring indicators, and these will need to be developed in accordance with the review of and introduction of new policies as part of the review process. However, there is scope to improve the monitoring process and this will be developed in more detail as the Local Plan review progresses through the regulatory process towards proposed submission.

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

No.

EQUALITY IMPACT ASSESSMENT (EIA)



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: lucille.buckley@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

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

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

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

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

EQUALITY IMPACT ASSESSMENT (EIA)



4.0 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

5.0 Approval

Signed: Head of Service: Rob Back	Date:
Name of Director: Andrew Walster	Date sent to Director:
Name of Lead Elected Member: Cllr. Naeem Akhtar	Date sent to Councillor:

Email completed EIA to equality@coventry.gov.uk