



Ministry of Housing,
Communities &
Local Government

National Planning Policy Framework: Equality Impact Assessment

July 2018

Ministry of Housing, Communities and Local Government



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1. Brief outline of policy proposal

The Secretary of State for Housing, Communities and Local Government proposes a revised National Planning Policy Framework (NPPF) to incorporate a number of the policy changes announced in the Housing White Paper '*Fixing our Broken Housing Market*', the consultation document '*Planning for the Right Homes in the Right Places*', policy proposals announced at Budget 2017 and a number of amendments to clarify and amalgamate existing policy. The revisions were published in draft in a consultation document on 5 March 2018. The responses to the consultation have been considered and, where appropriate, further amendments have been made. The accompanying Government Response provides the rationale for these decisions.

The NPPF consultation explicitly asked about the potential impact on protected groups. This document explains the policy intentions as they apply to those with protected characteristics, and where appropriate considers the responses to the consultation and the changes made in the light of these.

The revised NPPF continues to be a material consideration for planning decisions and a framework for plan making. It provides a balanced approach to addressing social, economic and environmental issues through the planning system, while at the same time facilitating a more systematic and positive approach to meeting the full range of identified housing needs.

2. Foreseeable impacts of policy proposal on people who share protected characteristics

This assesses the cumulative impacts on people who share protected characteristics, which may arise from changes to the existing policy.

The assessment references only those policy changes where potentially significant impacts have been identified on groups with protected characteristics. Therefore, not every policy change within the Framework will be listed. Where changes involve clarification, updating and streamlining text rather than substantive changes of policy, it is not anticipated that there will be any direct or indirect equality impacts, either positive or negative.

Crucially, these policy changes are strategic and set out at a national level. The application of the changes will, in the first instance, be the responsibility of each local planning authority. Each local planning authority will be subject to the Public Sector Equality Duty in carrying out its functions, including identifying all types of housing needed in their areas, and in engaging with the local community and other interested parties when developing plan policies. Furthermore, the local planning authority is under a duty to take into account representations made to it when determining a planning application. Accordingly, the NPPF has only an indirect effect on individuals – it is through the application of the Framework in plan-making and decision-taking that any impacts will occur, and therefore this assessment cannot be definitive on the impact on individuals with protected characteristics. This assessment broadly follows the structure of the revised Framework and considers the relevant issues and potentially significant impacts of the specific policies contained within it.

Introduction and Achieving sustainable development (Chapters 1-2)

Sustainable Development

The purpose of the planning system is to contribute to the achievement of sustainable development. This means meeting the needs of present as well as future generations, and includes all groups in our society. A small number of respondents to the NPPF consultation raised concerns that the definition of sustainable development in Chapter 2 did not emphasise inclusivity of development, especially for those with specialist needs.

The Government does not consider that the definition gives rise to any potential unequal treatment of groups with protected characteristics. The definition is widely-recognised as a high-level statement of overarching principles, and refers to meeting the needs of the present (implicitly, including all groups in society) as well as those of the future. It is anticipated that strengthened emphasis on plans accommodating identified needs of both present and future

generations in the revised Framework should increase the prospect of such needs being addressed. This will apply to the needs of the whole population, but given the ageing population¹, there should be positive impacts for older people in particular. The Government retains the view that the plan-led system is the most effective way of addressing needs, especially for those with protected characteristics, as this provides a greater degree of certainty so that service providers (such as for health care and social care) can align their strategies accordingly.

Sustainable Development Objectives and the Presumption in Favour of Sustainable Development

Although this part of the Framework has been shortened compared to the previous version, it retains a balanced approach to recognising and addressing economic, social and environmental needs, and as such the changes are not expected to have any differential effect on groups with protected characteristics. A small number of respondents to the consultation raised concerns that there is a lack of emphasis on access and inclusive design in the sustainable development objectives, and that the presumption in favour of sustainable development could weaken the requirement to meet the needs of older people and those with disabilities.

The sustainable development objectives are set at a high level, and are taken forward through policies elsewhere in the Framework. The social objective includes principles to meet the needs of all groups, including support for health, social and cultural wellbeing. Similarly, the presumption in favour of sustainable development sets a broad expectation that the development needs of all groups are addressed through plans. In the decision-taking context, when plans do not contain relevant policies (or the most important policies are out-of-date), the presumption places additional emphasis on the need to grant planning permission. This emphasis is subject to recognising and responding to other policies in the Framework, which ensures that the full range of national policies should be taken into account. Although footnote 6 to the presumption is now a 'closed list' of specific policies relating to various national protections, this does not mean that other policies (for example on accessibility) should not be taken into account, and indeed these other policies can still prove decisive in refusing development if the disbenefits would significantly and demonstrably outweigh the benefits. As a consequence, the changes to the presumption in favour of sustainable development are not expected to have a detrimental impact on groups with protected characteristics.

Neighbourhood Planning

Where communities plan for housing in their area in a neighbourhood plan, protections have been put in place to ensure that neighbourhood plans are not undermined and to retain community engagement and commitment to the process.

Therefore, certain neighbourhood plans are protected where specified criteria on land supply/housing delivery are met as set out in paragraph 14 of the revised Framework. It has been considered whether this protection would limit the housing supply which would otherwise come forward as a result of the presumption in favour of sustainable development, and therefore limit access to housing for people with protected characteristics. However the extent of the relief is limited, and to benefit from it neighbourhood plans need to contain policies and allocations to meet their identified housing requirement. Furthermore there may be more qualifying bodies allocating sites for housing in their plans, as the protection from the presumption provides more certainty that their plans will continue to have weight as part of the development plan. This should encourage the provision of housing sites using a fine-grained analysis of need. The revised Framework aims to ensure neighbourhood plans are given clear housing requirement figures so they are planning at the right level. Therefore, it is considered that there should be minimal impact on housing delivery and no differential impact on people with protected characteristics overall.

Plan-making (Chapter 3)

These changes are focused on streamlining and increasing the flexibility of plan-making and strengthening collaborative planning; improving the performance of local planning authorities; and supporting a general increase in housing delivery for the benefit of all. These are not expected to have any negative direct impacts on protected groups, and changes to the Framework set an expectation that authorities seek to meet needs, with a stronger

¹ In 2016 in the UK, 18% of people were aged 65 and over. By 2036, over half of local authorities are projected to have 25% or more of their local population aged 65 and over (Overview of the UK population: July 2017 - <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/overviewoftheukpopulation/july2017>)

emphasis on joint working to accommodate need, which ought to have a positive impact.

The new legal requirement for all areas to have strategic policies in place to address their strategic priorities should mean better coverage of plans, especially those dealing with strategic matters, as well as the need for regular reviews. Since strategic priorities will include homes and jobs (which will be matters that are amongst the most fundamental for all groups including protected groups), ensuring that plans come forward which address these matters means there is a greater likelihood of development coming forward to meet the needs of all members of community. This is expected to result in an indirect positive impact, since getting plans in place will indirectly lead to a more proactive and planned-for approach to development, with a framework in place to assess whether development is sustainable development. The change requiring authorities to review their plans at least once every five years to consider whether they need updating should have a positive indirect impact on groups with protected characteristics. The changes will ensure that local plans and spatial development strategies are kept up to date, ensuring they reflect the needs of the local population and any changes to local circumstances.

It has been considered whether planning for gypsies and travellers would be a strategic or non-strategic policy. Revised policies in this chapter need to be read over to the Planning Policy for Traveller Sites. As such, planning for homes for all gypsies and travellers (nomadic and settled) is a strategic policy as outlined in paragraph 20 of the revised Framework. Through emphasising the need to plan for homes (including for gypsies and travellers) as a strategic priority, this revised policy is considered to have a beneficial impact in advancing equality of opportunity for gypsies and travellers (those who fall under the definition in the Planning Policy for Traveller Sites and those who do not) and the rest of the community. This is because the requirement for all areas to have strategic policies in place means better coverage of plans and a more proactive and planned for approach to development to meet the needs of the community including gypsies and travellers. Since strategic policies include housing, there is a greater likelihood of planned development including housing coming forward to meet the needs of all members of community. This policy approach applies to gypsies and travellers.

It has been considered whether 'accessibility' should be incorporated in a parallel way to affordability, including making specific reference to this in paragraph 16, and 'accessible housing' as a minimum in the strategic policies section in paragraph 20a. It is concluded that specific reference to accessibility is not needed in these instances as the term 'housing' includes all kinds of housing need such as market, affordable and accessible housing for specific groups so it is not necessary to highlight particular needs or subsets of housing. Policies within the Framework should not be read in isolation, and the Housing and Making Effective Use of Land chapters make it clear that the housing needs of different groups, including those requiring accessible housing, should be assessed and reflected in planning policies. This is also reflected in current national planning practice guidance. The reference to 'including' affordable housing in the strategic policies is intended to highlight affordable housing – this however is not mutually exclusive or at the expense of other forms of housing which is for those with protected characteristics.

It has been considered whether the emphasis on planning for strategic policies 'as a minimum' could lead to negative outcomes disproportionately affecting groups with protected characteristics (notably disabled people, black and minority ethnic people, women, younger and older people). The changes to policy in the final Framework make it clearer there is a positive expectation that non-strategic policies come forward to deliver other policies which are important to an area (e.g. inclusive design), whilst still retaining flexibility on how this is done at the local level. It is considered that there should not be any direct or indirect negative impacts on protected groups as local planning authorities should still identify strategic priorities and ensure these are planned for, and should ensure that any other issues are addressed through non-strategic policies (contained in local plans) or through neighbourhood plans. The requirement for local planning authorities to make clear their strategic priorities should allow authorities to better coordinate development for the local population, including any specific needs of groups with protected characteristics.

Finally, the Framework makes clear that authorities should seek to meet objectively assessed needs of all types. Authorities must also fulfil their obligations under the Public Sector Equality Duty when they develop planning policies, and they should plan positively in light of their Public Sector Equality Duty requirements. Therefore it is considered that the 'positively prepared' soundness test should not place too much emphasis on addressing housing need at the expense of other aspects of sustainable development, such as local health needs, infrastructure and the environment.

Decision-making (Chapter 4)

As noted above, planning decisions are matters for local authorities and the Framework does not alter the duties and responsibilities of local authorities. The changes to policy on viability should streamline how funding for infrastructure

and affordable housing is secured and increase certainty around the likelihood of delivery, which should benefit all people accessing services including health centres, transport services and affordable housing – including people who share protected characteristics. People who access affordable housing are likely to include a high proportion of those who share protected characteristics compared to people accessing market housing.

The added certainty around viability, created through clear affordable housing requirements in local plans and a preferred standard approach to appraisals, is intended to increase the delivery of affordable housing.

As part of the changes to policy, viability assessments are to be made publicly available. This could raise concerns around publishing sensitive information within the viability assessments that relate to vulnerable individuals, which may include people with disabilities. Any associated guidance around publishing viability assessments will make it clear that such information should not be made publicly available.

The other changes mainly seek to clarify existing policy in the light of particular issues which have arisen since the Framework came into force. The changes are intended to help decision-makers foster the delivery of sustainable development, and are not anticipated to have a differential impact on groups with protected characteristics.

Delivering a wide choice of high quality homes (Chapter 5)

The policy changes aim to increase housing supply, provide a wide range of homes for all groups in society, and increase affordability. It is anticipated that the changes should, in general, provide positive indirect benefits for groups who access all forms of housing as they place a requirement on plan makers to identify specific groups with particular needs such as older and disabled people, and clarify that authorities are expected to have clear policies for addressing their specific needs. However, it is anticipated that some groups will be impacted directly, depending on their tenure status, as people who share protected characteristics disproportionately access affordable housing.

It has been considered whether the policy requiring 10% affordable home ownership products on major sites could undermine the ability to deliver affordable housing for lower income households by introducing a preference for ownership (as lower income households are more likely to be in rented affordable housing than affordable home ownership). Many people with characteristics protected by the Equality Act 2010 are concentrated among lower income households (e.g. disabled people, black and minority ethnic people, women, younger and older people). However the policies put forward in the Framework as a whole will increase the overall supply of housing and should not reduce the current supply of affordable housing for rent, so these groups should not be negatively affected by this. Additionally the policy specifies that the requirement will not be imposed where it would significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

Policies to increase housing supply overall such as the Housing Delivery Test and entry level exception sites are more likely to benefit younger people as they are less likely to already be homeowners. The majority of first time buyers, or those moving into affordable home ownership including shared ownership, are aged 16 – 44. Older people will be affected positively by the strengthening of what is now paragraph 61, as local planning authorities are expected to have planning policies which identify the size, type and tenure of homes required for different groups in the community including older people. They should also be positively affected by the revised definition of the term “older people” which will additionally include those approaching, as well as over, retirement age.

As with all other protected groups, disabled people should benefit from an increase in housing supply. Disabled people will be affected positively by the strengthening of paragraph 61, as local planning authorities are now expected to have planning policies which identify the size, type and tenure of homes required for different groups in the community including disabled people. In the light of consultation responses raising concerns about the delivery of accessible housing, a footnote has been added to the design chapter setting out that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing.

It has been considered whether to reference the needs of black and minority ethnic households and other protected groups not currently listed in paragraph 61. We have concluded that it is unnecessary as it is not a closed list and therefore not limited to the named groups.

All groups with protected characteristics should indirectly benefit from the Framework highlighting the opportunity for all members of the community, irrespective of any protected characteristic, to get involved in neighbourhood planning, to shape the development of their local area and to allocate small housing sites. The opportunity for gypsies and travellers to be involved in neighbourhood planning may have beneficial impacts in fostering good relations between travellers and non-travellers in line with section 149 of the Equality Act, 2010.

Support has been indicated in some consultation responses for the application of the Housing Delivery Test to gypsies and travellers due to perceived slow delivery of sites and lack of central government monitoring of delivery of pitches. Where there is under-delivery of housing, the buffer added to five year land supply requirements and presumption in favour of sustainable development consequences of the delivery test may benefit those gypsies and travellers who fall outside the scope of the Planning Policy for Traveller Sites as part of the wider community in bringing more land forward for development. This should consequentially increase the granting of planning permissions to deliver more homes.

The consequences of the Housing Delivery Test would not apply to gypsies and travellers who fall within the scope of the Planning Policy for Traveller Sites itself. The delivery test is intended to address the gap between site allocations and permissions and the numbers that are actually delivered. As build-out of traveller sites is faster and normally involves smaller sites, speed of delivery is considered to be less of an issue for pitches, and it is therefore considered that not applying the delivery test consequences will not negatively affect gypsies and travellers who fall within the scope of the Planning Policy for Traveller Sites. It is therefore not considered necessary for the Housing Delivery Test consequences to apply to the Planning Policy for Traveller Sites.

The new policy which allows local authorities to agree their 5 year land supply once on an annual basis (5YLS fix) will not be applicable to the Planning Policy for Traveller Sites land supply calculation. The annual agreement is designed to offer certainty to local authorities and communities where the land supply position is close to the housing required in the area, and therefore subject to regular challenge. We are not aware that this is a particular issue for Planning Policy for Traveller Sites land supply. The existing policy on land supply for Planning Policy for Traveller Sites would continue to apply where an authority has agreed their 5 year land supply under the National Planning Policy Framework. No responses to Q41 of the National Planning Policy Framework consultation argued either for or against the application of the 5YLS fix to the Planning Policy for Traveller Sites. Equalities impacts will be kept under review following the publication of the revised National Planning Policy Framework and as part of consideration of amendments to the Planning Policy for Traveller Sites.

Building a strong, competitive economy (Chapter 6)

The changes to the first part of this chapter are limited, and designed to maintain a supportive framework for economic development in different parts of the county, while recognising the rapidity of change in some sectors. This approach is not expected to have any differential impact on groups with protected characteristics. The key change in the section in the rural economy is that policy now recognises that sites for local business and community needs may need to be located next to or beyond existing settlements, and in locations not well served by public transport. Although such sites may be less accessible to people with limited mobility, in practice this policy is reflecting the reality of where sites for rural business and community facilities need to be located, so is unlikely to have any significant differential impact on these groups. This is particularly true given the safeguards included in the new policy, which encourages sites that are physically well-related to settlements and promotes opportunities to make sites more sustainable (such as through improved access by foot or cycle).

Ensuring the vitality of town centres (Chapter 7)

Town centres are facing significant pressures to change. Acknowledging this, the policies in this chapter have been amended to ensure a more flexible approach is taken to planning for new development and changes of use in town centres. Change in town centres will largely be determined by market forces. The added flexibility that the changes provide will allow greater levels of change in accordance with market demands. The resulting changes have the potential to have negative, neutral or positive impacts on groups with protected characteristics. It is not possible to determine what these may be due to the nature of change being driven by the market as explained above. However to the extent that the revised Framework encourages more housing in town centres, while continuing to encourage authorities to guard against the loss of valued facilities and services, it offers the opportunity for more people to live closer to shops and services, which could benefit those who are less mobile such as older people.

Promoting healthy and safe communities (Chapter 8)

The policy changes support healthy lifestyles, which should indirectly benefit all groups, but particularly those for whom access is likely to be more important than for other groups, such as older and disabled people, and who might have been negatively affected by limited access to facilities that help to support healthy living.

The changes giving more explicit recognition to the way that planning can promote social interaction are likely to

benefit groups with protected characteristics, including on grounds of age, disability, race and religion – as they should support environments that make it easier for people to mix and move around, thus providing greater opportunities for the fostering of good relations between those with protected characteristics and the rest of the population, and advancing equal opportunities between protected and non-protected groups.

It has also been considered whether the new policy on ways in which the planning system can promote public safety could disadvantage those with limited mobility (e.g. on grounds of age, disability or pregnancy), or give rise to concerns on the part of groups who might suffer discrimination on the grounds of race or religion, due to layouts or physical barriers that create an obstacle or a perception that public spaces are less open to certain groups. The policy is unlikely to have a significant negative impact on those with protected characteristics given the wider policies in the Framework. New guidance will be published which will address access considerations in relation to the types of location and developments involved.

Promoting sustainable transport (Chapter 9)

Older people and disabled people in particular should benefit from increased emphasis on creating places that are safe and secure, by minimising the scope for conflicts between pedestrians, cyclists and vehicles, for example. They will also be supported by the changes regarding avoiding unnecessary street clutter, which could be a hazard for people with visual or physical impairments. People who share these protected characteristics should also benefit from general facilitation of access to high quality public transport and policies aimed at limiting the need to travel – there is a positive change from considering the needs of people with disabilities to addressing the needs of people with disabilities and reduced mobility in relation to all modes of transport. A genuine choice of transport modes should help achieve more sustainable, better planned transport, which should consequently help reduce congestion and emissions, and improve air quality and public health – impacting positively on people such as the elderly who may have respiratory problems for example. It is therefore considered that these policies should have a positive impact on the elderly and disabled people.

Supporting high quality communications (Chapter 10)

The changes are not considered to have an impact directly or indirectly on any protected group or those who share protected characteristics, or impact on them in different ways from people who are not in any group or do not share those protected characteristics.

Making effective use of land (Chapter 11)

This new chapter allows land to be used more flexibly – particularly where housing is a priority – and expects minimum densities in appropriate locations, including utilising the space above shops, and supporting minimum density standards in city and town centres and around transport hubs, to enable more homes to be developed in the areas that need them most and which are most accessible. It is considered that the policy would have no direct impact on people who share protected characteristics, but could have an indirect impact upon groups with restricted mobility including the disabled, elderly, low income households, children and young people, so its implementation will be kept under review. Higher density living may not be suitable for all people. Families, the elderly and disabled may prefer to live in lower density housing, which has specialist access requirements or private amenity space. This is for local authorities to consider in their assessment of housing need.

The Framework as a whole supports the development of a range of housing types to meet the needs of identified groups including the disabled, elderly, low income households, children and young people. The Government expects higher densities to be achieved by well-designed, inclusive development, that maximise the opportunities for all groups to live in attractive and accessible housing.

Achieving well-designed places (Chapter 12)

This chapter should mean that all groups indirectly benefit from design expectations being strengthened, with community engagement meaning all sections of society are able to influence the design of future developments within their local area, thus advancing equality of opportunity between people who share a protected characteristic and people who do not. Well-designed development that meets the needs of the community can ensure that the positive benefits of new development are experienced by all, including those with protected characteristics.

The Building for Life standard referred to in the chapter sets out a checklist of considerations for use in setting out planning policies, or for deciding the appropriateness of a development proposal. The policy encourages local

planning authorities to utilise tools such as this, which should help ensure that all people, including those who share protected characteristics, are taken into consideration when design policies are developed and applied. This could assist local authorities in meeting their own Public Sector Equality Duty requirements.

Protecting the Green Belt (Chapter 13)

The changes to Chapter 13 support the wider use of brownfield land for affordable homes if they do not cause substantial harm to the openness of the Green Belt). Insofar as any of these support the building of more affordable homes, these will also be available to those with protected characteristics, including travellers living in permanent accommodation.

Paragraph 145 sets out the limited exceptions where new buildings will not be considered as inappropriate development in the Green Belt, including the circumstances in which brownfield land may be re-used. These exceptions do not enable those groups that fall under the Planning Policy for Traveller Sites to create a new site. However, local planning authorities continue to have responsibilities to meet the needs of those covered under the Planning Policy for Traveller Sites. Although the amendments are expected to lead, over time, to an increase in built housing (especially affordable homes) in villages and on brownfield land in the Green Belt, there is no reason to suppose that such land is currently suitable, accessible and available for use as an authorised traveller site by gypsies and travellers. Therefore our assessment is that the policy is unlikely to cause a significant loss of land suitable for traveller sites and does not affect the requirement for local authorities to meet the needs of gypsies and travellers in line with the Planning Policy for Traveller Sites.

Meeting the challenge of climate change, flooding and coastal change (Chapter 14)

Minor changes to the Framework clarify that planning policies should support the future resilience of communities and infrastructure in the face of climate change, and that the impact of rising temperatures should be amongst the planning impacts considered. These changes are not expected to have any foreseeable direct or indirect negative impacts on any protected groups. The changes are anticipated to lead to positive indirect benefits for all, and especially for vulnerable groups for whom climate change is expected to have a disproportionate adverse impact. These include groups such as low income households, elderly people, individuals with poor health, and residents of housing in areas at risk of flooding and coastal erosion.

In relation to flood risk, amendments to the Framework clarify the application of the exception test in plan-making and decision-making; policies relating to flood risk mitigation expectations for minor developments and changes of use; and that plan policies to manage flood risk from all sources should also take account of any cumulative flood risk. These changes are not expected to have any direct or indirect negative impacts on any protected groups. To the extent that these changes are seeking to ensure greater clarity in the understanding and application of existing planning policies intended to protect people and property from flooding, they should have indirect benefits for all, and especially for vulnerable groups for whom flooding can have a disproportionate adverse impact. These include groups such as elderly people, individuals with poor health and people with restricted mobility.

Conserving and enhancing the natural environment (Chapter 15)

In general, protecting and enhancing the natural environment should benefit all groups; indeed there is an extensive body of literature on the impact of access to the environment on personal wellbeing, particularly for those with health conditions. The strengthened protection for ancient woodland and ancient or veteran trees should have a beneficial impact for everyone, including protected groups. It is not considered that this policy would have any differential impact on any groups who share protected characteristics as compared to persons who do not share those protected characteristics.

The revised Framework contains strengthened policy on taking air quality into account in the planning system. Improved air quality should have a beneficial impact for everyone, including protected groups. According to the Clean Air Strategy 2018, elderly people are most at risk from poor air quality, as it can result in reduced life-expectancy and reduced wellbeing. There is also emerging evidence for a link between air pollution and an acceleration of the decline in cognitive functions. Therefore, better air quality could positively and differentially impact the health of older and disabled people and young people as compared to persons who do not share those protected characteristics.

It is not considered that the clarification of the agent of change principle should have a differential impact on groups who share protected characteristics as compared to persons who do not share protected characteristics.

The policy sets out that the agent of change (the applicant) should be required to include mitigation for 'significant adverse effects' as part of obtaining planning permission. The anticipated impact is that fewer businesses will be subject to nuisance complaints which could lead to restriction of their activities or closure. This policy should help to preserve local facilities open to use by all the community, including protected groups which will aid in fostering good relations between protected groups and other members of the community.

Conserving and enhancing the historic environment (Chapter 16)

The amendments to this chapter do not introduce new policy. Instead, they clarify existing policy in this area in the light of particular issues which have arisen since the Framework came into force and in response to consultation on the draft Framework. As such, it is not envisaged that the amended chapter would have any differential impacts (positive or negative) on those who share protected characteristics as compared to those who do not share those characteristics.

Facilitating the sustainable use of minerals (Chapter 17)

It is not considered that the revised policy in the Framework is likely to have any disproportionate impact on people who share protected characteristics as compared to people who do not share those protected characteristics. It is not currently anticipated that there would be any positive or negative adverse effects on the ability of communities to have their voice heard in respect of plan-making or decision-making on existing minerals or shale projects or proposed projects resulting from this revised policy.

Changes to the Planning Policy for Traveller Sites as a result of the revised NPPF

Question 41 of the National Planning Policy Framework consultation asked whether any changes should be made to the Planning Policy for Traveller Sites as a result of changes to the Framework. Many responses went beyond this question, and instead made broad comments about the substantive content and application of the Planning Policy for Traveller Sites, including the practical implications of the current definition of traveller. Some responses supporting changes to the Planning Policy for Traveller Sites related to the need for clearer policies and definitions. Clarity was requested regarding a range of issues including the coverage of paragraph 62 of the draft revised Framework, the needs of gypsies and travellers not covered by the Policy for Traveller Sites, and the application of the standard method for assessing housing need with regard to gypsies and travellers.

Paragraphs 1 of the Planning Policy for Traveller Sites and 4 of the revised National Planning Policy Framework state that these two documents should read in conjunction. To assist this policy read across, changes have been made to the Framework to provide greater explanation on how its new policies are read with the Planning Policy for Traveller Sites. An example of where read-over to the Planning Policy for Traveller Sites advances equality for gypsies and travellers includes the application of the revised plan-making chapter of the Framework, specifically the requirement to plan for strategic policies, which will apply to nomadic gypsy and traveller housing. As these changes are covered by the National Planning Policy Framework and guidance, no direct consequential amendments have been made at this time to the Planning Policy for Traveller Sites.

There are three areas where revised policies will only apply to gypsies and travellers who fall within the NPPF and non-travellers. These are the application of paragraph 145g, the consequences of the Housing Delivery Test and the ability to 'fix' five year supply estimates. Assessments of impact relating to these policy areas are addressed in the relevant sections of this Public Sector Equality Duty analysis. Equality impacts raised in consultation responses to question 41 have also been considered. These include a range of issues including equality implications arising from having a separate policy for gypsies and travellers in the Planning Policy for Traveller Sites (with some references being made to gypsies and travellers experiencing both positive and negative discrimination from this policy framework), and the exclusion of the elderly and disabled gypsies and travellers who have ceased their nomadic lifestyle from the Planning Policy for Traveller Sites definition. This issue has also been raised in responses to the Unauthorised Encampments consultation, with one response stating that travellers who have had to cease their nomadic lifestyle due to ill health, education needs or old age should be included in the Planning Policy for Traveller Sites in order to be eligible for what they considered to be the more permissive regime of the Planning Policy for Traveller Sites which they felt would increase their prospects of obtaining planning permission.

Any relative differential treatment of gypsies and travellers resulting from any policies in the National Planning Policy Framework will be kept under review following the publication of the revised Framework. A consultation on [Powers for Dealing with Unauthorised Development and Encampments](#) closed on the 15 June 2018. This

consultation included a question about whether there are any specific barriers to the provision of more authorised permanent and transit sites and, if so, whether there is any action that the Government could take to help overcome those barriers. Consideration will be given to whether any changes may be required to the Planning Policy for Traveller Sites in response to the consultation on the draft revised Framework, alongside consideration of the issues raised in the consultation responses on Unauthorised Development and Encampments, including those responses which raise equality issues.

The Family Test

It is not anticipated that there will be an impact on family relationships arising from the revisions to the Framework. However it is considered that higher density living may not be suitable for all people, including families. The Government expects higher densities to be achieved by well-designed, inclusive development. Local planning authorities will be expected to plan for a range of housing types to accommodate the needs of identified groups, including families.

The changes are fundamental to delivering the homes we need and set out a comprehensive approach to ensure that we get the right homes built in the right places of the right quality. These will support a general increase in housing delivery for the benefit of all and therefore families will benefit from an indirect positive impact.

Consider your policy in light of each of the goals set out in section 149 (underlined below). Do any other impacts or opportunities arise which are not set out above?

All anticipated impacts have been described in the section above.

3. Do you need any more information to assess Q2 above? If so, how will you obtain it?

Specific questions about impacts were asked during the consultation, and this is reflected in both the response to the consultation and in this analysis. We recognise that the available data do not allow us to investigate all potential impacts on all groups with protected characteristics. However, in addition to the data used for this analysis, we have reviewed consultation responses following publication of the draft Framework for any anticipated impacts on people who share protected characteristics. Where these raised issues that could have a potential impact, we have built this into the assessment. Following implementation of the changes we will continue to assess its impact on people who share protected characteristics. This includes impacts on gypsies and travellers; in particular, consideration will be given to whether any changes may be required to the Planning Policy for Traveller Sites in response to the consultation on the draft revised Framework, alongside consideration of the issues raised in the responses to the separate consultation on Unauthorised Development and Encampments. The Ministry of Housing, Communities and Local Government would welcome any further evidence or analysis of the impact of its planning policies, and has published a list of its key areas of research interest, including the evaluation of planning and housing interventions: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/708137/AreasofresearchinterestMHCLG.pdf.

4. In light of the overall policy objectives, are there ways to avoid or mitigate any negative impacts you have noted in Q2 above?

Some changes to the draft policies have been made in light of the consultation to mitigate impacts on both wider society and specifically on those with protected characteristics, for example removal of the references which could have implied that non-strategic policies are optional, and revisions to the text to make it clear that local authorities should seek to meet needs for all types of housing, including use of the optional technical standards for accessibility.

5. In light of this analysis, what is recommended and why?

The Government considers the public interest lies in increasing housing supply and supporting sustainable development. The proposed changes to the National Planning Policy Framework have been assessed in the light of the Public Sector Equality Duty. Where potential negative impacts on protected groups have been identified,

amendments have been made to mitigate them. The Government will monitor the implementation of the Framework and, if adverse impacts on protected groups become evident, then it will consider how to address them, whether by amending the policy, or by other means.

6. Where impacts are or could be significant, when and how will they be reviewed?

We do not consider that the revised Framework will have significant impacts.

[See Annex B – Effects of Policy Changes]

This analysis was undertaken by:

Name/Title	Catherine Marsh & Lisa Sandercock
Directorate/Unit	Planning Policy and Reform
Date	23 July 2018

SCS Sign off Simon Gallagher

I have read the available evidence and I am satisfied with the above analysis

Please keep a record of this analysis for audit purposes and send a copy to errol.barnett@communities.qsi.gov.uk for his records

Annex A Evidence for Housing

The following analysis sets out the characteristics of individuals with protected characteristics of age, disability, sex and race, who recently moved into different tenures of dwellings. It is intended to demonstrate how indirect impacts of increased housing provision could impact certain groups more than others. These impacts are not direct results of the policies, but could arise depending on subsequent decision making outside of the coverage of the policies.

Age

New housing is more likely to benefit younger people as they are less likely to already be homeowners. They are therefore more likely to benefit from new homes being built, as a result of the resulting downward pressure on house prices and rents. Households with the household reference person aged 16 – 44 make up the majority of social renters (69%), affordable renters (76%), and affordable home ownership including shared ownership (78%), recent first time buyers (92%) and recent movers into the private rental sector (74%). Therefore younger people should benefit directly from an increase in new housing being made available as the majority of first time buyers, and those moving into affordable home ownership including shared ownership, are aged 16 – 44².

Households moving into different tenure types (i.e. new to the particular type of tenure)

2014-15 and 2015-16 EHS and CORE data

Age of household reference person	Social rent ¹ %	Affordable rent ² %	Affordable home ownership including shared ownership %	Recent first time buyers %	Recent movers into private rental sector %	All households %
16-24	21.1	19.2	10.7	8.8	23.8	3.3
25-34	24.4	31.7	46.1	62.5	32.8	14.5
35-44	16.1	18.7	21.5	20.7	17.2	17.5
45-54	13.3	12.6	10.1	6.2	13.0	20.1
55-64	11.2	7.8	5.7	1.0	7.8	16.2
65-74	7.5	4.9	3.6	u	4.0	14.3
74+	6.5	5.2	2.4	u	1.4	14.0
Total	100	100	100	100	100	100
<i>Dataset</i>	<i>CORE lettings</i>	<i>CORE lettings</i>	<i>CORE sales</i>	<i>EHS</i>	<i>EHS</i>	<i>EHS</i>

¹ Includes where age is imputed

² Additional 588 (1.3%) refused

Notes:

- recent first time buyers are those who bought a home for the first time within the last 3 years. Recent movers into the private rental sector are those who moved into the private rental sector within the last 3 years

² 2014-15 and 2015-16 EHS and CORE data

Disability

Consideration has been given to whether people with a disability would be adversely impacted by an increase in housing delivery but, as with all other protected groups, this group should benefit. Social rent and affordable rental sectors have a higher prevalence of households containing someone with a disability or long term illness than other housing sectors, therefore they may disproportionately benefit from increases in housing supply, depending on the tenure of housing resulting.

Households moving into different tenure types

2014-15 and 2015-16 EHS and CORE data

At least one member of household with long term illness or disability	Moved into social sector in the last 3 years (proxy for entry into Social Rent and Affordable Rent)	Recent first time buyers	Recent movers into private rental sector	All households
	%	%	%	%
Yes	40.5	10.2	19.0	31.0
No	59.5	89.8	81.0	69.0
Total	100%	100%	100%	100%
<i>Dataset</i>	<i>EHS</i>	<i>EHS</i>	<i>EHS</i>	<i>EHS</i>

Notes:

- recent first time buyers are those who bought a home for the first time within the last 3 years. Recent movers into the private rental sector are those who moved into the private rental sector within the last 3 years

Gender

Women could benefit indirectly from an increase in affordable rental properties as they are more represented in these affordable rental properties (61%) compared to all households (51%)³. In all other tenures, there are no significant differences in terms of gender.

Adults in households moving into different tenure types

2014-15 and 2015-16 EHS and CORE data

Sex of household reference person	Affordable home ownership including shared ownership		Recent first time buyers	Recent movers into private rental sector	All households
	Social rent ¹ %	Affordable rent ² %	%	%	%
Male	45.1	35.1	46.9	52.1	52.8
Female	54.9	64.9	53.1	47.9	47.2
Total	100	100	100	100	100

³ 2014-15 and 2015-16 EHS and CORE data

Dataset	CORE lettings	CORE lettings	CORE sales	EHS	EHS	EHS
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¹ Includes where sex is imputed

² 212 households (0.5%) refused

Notes:

- all adults instead of household reference person used on this tab to avoid biases due to males being more likely to be the household reference person. The data is adults in households where the household reference person has moved into the different types of home

- recent first time buyers are those who bought a home for the first time within the last 3 years. Recent movers into the private rental sector are those who moved into the private rental sector within the last 3 years

Race

Households where the household reference person is Black are more likely to be social (7%) or affordable renters (8%), compared to all households (3%), while households where the household reference person is Indian are more likely to be recent first time buyers (8%) compared to the population as a whole (2%). Therefore different ethnic groups may disproportionately benefit from increases in housing supply, depending on the tenure of housing resulting.

Households moving into different tenure types

2014-15 and 2015-16 EHS and CORE data

Ethnicity household reference person	of Social rent ¹ %	Affordabl e rent ² %	Affordabl e home ownershi p including shared ownershi p %	Recent first time buyers %	Recent movers into private rental sector %	All househol ds %
White	83.3	83.7	88.1	83.4	82.5	88.8
Black	7.2	6.5	2.7	1.1	3.5	3.1
Indian	0.8	0.7	1.9	7.6	2.7	2.2
Pakistani or Bangladeshi	3.5	4.1	1.1	2.7	3.1	1.9
Other	5.2	5.0	6.1	5.3	8.1	4.0
Total	100	100	100	100	100	100
Dataset	CORE lettings	CORE lettings	CORE sales	EHS	EHS	EHS

¹ Additional 15,090 (5.2%) refused

² Additional 1,362 (3.1%) refused

Notes:

- recent first time buyers are those who bought a home for the first time within the last 3 years. Recent movers into the private rental sector are those who moved into the private rental sector within the last 3 years

Gypsies and Travellers:

Gypsies and travellers are a protected ethnic group under the *Equality Act 2010*. Planning policy is split between Planning Policy for Travelling Sites (PPTS), which contains policy for gypsies and travellers with a nomadic habit of life whatever their race or origin, see the definition in Annex 1 of the PPTS, (“PPTS gypsies and travellers”) and the gypsies and travellers who fall outside this definition (“NPPF gypsies and travellers”).

Increased housing will benefit protected groups by ensuring Local Authorities deliver the homes their area needs. The National Planning Policy Framework is clear on the duties of local authorities to plan for the needs of all communities. This should help to increase delivery of housing overall, including housing and / or sites for NPPF gypsies and travellers. Changes to the PPTS are being considered in light of the NPPF consultation responses and the consultation on powers for dealing with unauthorised development and encampments. The equality impacts of any changes will be kept under review.

Annex B – Effects of Policy Changes	
Protected Characteristics	Effects of Policy Changes
All Groups	<p><i>Introduction and Achieving sustainable development (Chapters 1-2)</i></p> <p>The Government does not consider that the definition of sustainable development gives rise to any potential unequal treatment of groups with protected characteristics. The definition is widely-recognised as a high-level statement of overarching principles, and refers to meeting the needs of the present (implicitly, including all groups in society) as well as those of the future. It is anticipated that strengthened emphasis on plans accommodating identified needs of both present and future generations in the revised Framework should increase the prospect of such needs being addressed. This will apply to the needs of the whole population, but given the ageing population⁴, there should be positive impacts for older people in particular. The Government retains the view that the plan-led system is the most effective way of addressing needs, especially for those with protected characteristics, as this provides a greater degree of certainty so that service providers (such as for health care and social care) can align their strategies accordingly.</p> <p><i>Plan-making (Chapter 3)</i></p> <p>The new legal requirement for all areas to have strategic policies in place to address strategic priorities should mean better coverage of plans, especially those dealing with strategic matters, as well as the need for regular reviews. Since strategic priorities will include homes and jobs (which will be matters that are amongst the most fundamental for all groups including protected groups), ensuring that plans come forward which address these matters means there is a greater likelihood of development coming forward to meet the needs of all members of community. This is expected to result in an indirect positive impact, since getting plans in place will indirectly lead</p>

⁴ In 2016 in the UK, 18% of people were aged 65 and over. By 2036, over half of local authorities are projected to have 25% or more of their local population aged 65 and over (Overview of the UK population: July 2017 - <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/overviewoftheukpopulation/july2017>)

to a more proactive and planned-for approach to development. The change requiring authorities to review their plans at least once every five years to consider whether they need updating should have a positive indirect impact on groups with protected characteristics. The changes should ensure that local plans and spatial development strategies are kept up-to-date, ensuring they reflect the needs of the local population and any changes to local circumstances.

Decision-making (Chapter 4)

The changes to policy on viability should streamline how funding for infrastructure and affordable housing is secured and increase certainty around the likelihood of delivery, which should benefit all people accessing services including health centres, transport services and affordable housing – including people who share protected characteristics. People who access affordable housing are likely to include a high proportion of those who share protected characteristics compared to people accessing market housing.

Delivering a wide choice of high quality homes (Chapter 5)

The policy changes aim to increase housing supply, provide a wide range of homes for all groups in society, and increase affordability. It is anticipated that the changes should, in general, provide positive indirect benefits for groups who access all forms of housing as it places a requirement on plan makers to identify specific groups with particular needs such as older and disabled people, and clarifies that authorities are expected to have clear policies for addressing their specific needs. However, it is anticipated that some groups will be affected directly (and in a positive way), depending on their tenure status, as people who share protected characteristics disproportionately access affordable housing.

Promoting healthy and safe communities (Chapter 8)

The policy changes support healthy lifestyles, which should indirectly benefit all groups, but particularly those for whom access is likely to be more important than for other groups, such as older and disabled people, and who might have been negatively affected by limited access to facilities that help to support healthy living.

The changes giving more explicit recognition to the way that planning can promote social interaction is likely to benefit groups with protected characteristics, including on grounds of age, disability, race and religion – as they should support environments that make it easier for people to mix and move around, thus providing greater opportunities for the fostering of good relations between those with protected characteristics and the rest of the population, and advancing equal opportunities between protected and non-protected groups.

It has also been considered whether the new policy on ways in which the planning system can promote public safety could disadvantage those with limited mobility (e.g. on grounds of age, disability or pregnancy), or give rise to concerns on the part of groups who might suffer discrimination on the grounds of race or religion, due to layouts or physical barriers that create an obstacle or a perception that public spaces are less open to certain groups. The policy is unlikely to have a significant negative impact on those with protected characteristics given the wider policies in the Framework. New guidance will be published which will address access considerations in relation to the types of location and developments involved.

Achieving well-designed places (Chapter 12)

This chapter should mean that all groups indirectly benefit from design expectations being strengthened, with community engagement meaning all sections of society are able to influence the design of future developments within their local area, thus advancing equality of opportunity between people who share a protected characteristic and people who do not. Well-designed development that meets the needs of the community can ensure that the positive benefits of new development are experienced by all including those with protected characteristics.

Meeting the challenge of climate change, flooding and coastal change (Chapter 14)

Minor changes to the Framework clarify that planning policies should support the future resilience of communities and infrastructure in the face of climate change, and that the impact of rising temperatures should be amongst the planning impacts considered. These changes are not expected to have any foreseeable direct or indirect negative impacts on any protected groups.

	<p>The changes are anticipated to lead to positive indirect benefits for all, and especially for vulnerable groups for whom climate change is expected to have a disproportionate adverse impact. These include groups such as low income households, elderly people, individuals with poor health, and residents of housing in areas at risk of flooding and coastal erosion.</p> <p><i>Conserving and enhancing the natural environment (Chapter 15)</i></p> <p>In general, protecting and enhancing the natural environment should benefit all groups; indeed there is an extensive body of literature on the impact of access to the environment on personal wellbeing, particularly for those with health conditions. The strengthened protection for ancient woodland and ancient or veteran trees should have a beneficial impact for everyone, including protected groups as they are irreplaceable habitats which have substantial benefits for biodiversity. It is not considered that this policy would have any differential impact on any groups who share protected characteristics as compared to persons who do not share those protected characteristics.</p>
Age	<p><i>Plan-making (Chapter 3)</i></p> <p>It has been considered whether the emphasis on planning for strategic policies ‘as a minimum’ could lead to negative outcomes disproportionately affecting some groups with protected characteristics (notably disabled people, black and minority ethnic people, women, younger and older people). The changes to policy in the final Framework make it clearer that there is a positive expectation that non-strategic policies come forward to deliver other policies which are important to an area (e.g. inclusive design), whilst still retaining flexibility on how this is done at the local level. The requirement for local planning authorities to make clear their strategic priorities should allow authorities to better coordinate development for the local population, including any specific needs of groups with protected characteristics.</p> <p><i>Delivering a wide choice of high quality homes (Chapter 5)</i></p> <p>It has been considered whether the policy requiring 10% affordable home ownership products on major sites could undermine the ability to deliver affordable housing for lower income households</p>

by introducing a preference for ownership products (as lower income households are more likely to be in rented affordable housing than affordable home ownership). Many people with characteristics protected by the Equality Act 2010 are concentrated among lower income households (e.g. disabled people, black and minority ethnic people, women, younger and older people). However the policies put forward in the Framework as a whole will increase the overall supply of housing and should not affect the current supply of affordable housing for rent. Additionally the policy specifies that the requirement will not be imposed where it would significantly prejudice the ability to meet the identified affordable housing needs of specific groups.

Policies to increase housing supply overall such as the Housing Delivery Test and entry level exception sites are more likely to benefit younger people as they are less likely to already be homeowners. The majority of first time buyers, or those moving into affordable home ownership including shared ownership, are aged 16 – 44. Older people will be affected positively by the strengthening of what is now paragraph 61, as local planning authorities are now expected to have planning policies which identify the size, type and tenure of homes required for different groups in the community including older people. They should also be positively affected by the revised definition of the term “older people” which will additionally include those approaching, as well as over, retirement age.

Building a strong, competitive economy (Chapter 6)

The changes to the first part of this chapter are limited, and designed to maintain a supportive framework for economic development in different parts of the county, while recognising the rapidity of change in some sectors. This approach is not expected to have any differential impact on groups with protected characteristics. The key change in the section in the rural economy is that policy now recognises that sites for local business and community needs may need to be located next to or beyond existing settlements, and in locations not well served by public transport. Although such sites may be less accessible to people with limited mobility, in practice this policy is reflecting the reality of where sites for rural business and community facilities need to be located, so is unlikely to have any significant differential impact on these groups. This is particularly true given the safeguards included in the new policy, which encourages sites that are

physically well-related to settlements and promotes opportunities to make sites more sustainable (such as through improved access by foot or cycle).

Promoting sustainable transport (Chapter 9)

Older people and disabled people in particular should benefit from increased emphasis on creating places that are safe and secure, by minimising the scope for conflicts between pedestrians, cyclists and vehicles, for example. They will also be supported by the changes regarding avoiding unnecessary street clutter, which could be a hazard for people with visual or physical impairments. People who share these protected characteristics should also benefit from general facilitation of access to high quality public transport and policies aimed at limiting the need to travel – there is a positive change from considering the needs of people with disabilities to addressing the needs of people with disabilities and reduced mobility in relation to all modes of transport. A genuine choice of transport modes should help achieve more sustainable, better planned transport, which should consequently help reduce congestion and emissions, and improve air quality and public health - impacting positively on people such as the elderly who may have respiratory problems for example. It is therefore considered that these policies would have a positive impact on the elderly and disabled people.

Making Effective Use of Land (Chapter 11)

This new chapter allows land to be used more flexibly – particularly where housing is a priority – and expects minimum densities in appropriate locations, including utilising the space above shops, and supporting minimum density standards in city and town centres and around transport hubs, to enable more homes to be developed in the areas that need them most and which are most accessible. It is considered that the policy would have no direct impact on people who share protected characteristics, but could have an indirect impact upon groups with restricted mobility including the disabled, elderly, low income households, children and young people, so its implementation will be kept under review. Higher density living may not be suitable for all people. Families, the elderly and disabled may prefer to live in lower density housing, which has specialist access requirements or private amenity space. This is for local authorities to consider in their assessment of housing need.

	<p>The Framework as a whole supports the development of a range of housing types to meet the needs of identified groups including the disabled, elderly, low income households, children and young people. The Government expects higher densities to be achieved by well-designed, inclusive development, that maximise the opportunities for all groups to live in attractive and accessible housing.</p> <p><i>Protecting the Green Belt (Chapter 13)</i></p> <p>The changes to Chapter 13 support the wider use of brownfield land for affordable homes if they do not cause substantial harm to the openness of the Green Belt. Insofar as any of these support the building of more affordable homes, these will also be available to those with protected characteristics.</p>
Disability	<p><i>Plan-making (Chapter 3) – as ‘Age’ above</i></p> <p><i>Delivering a wide choice of high quality homes (Chapter 5)</i></p> <p>As with all other protected groups, disabled people should benefit from an increase in housing supply. Disabled people will be affected positively by the strengthening of what is now paragraph 61, as local planning authorities are now expected to have planning policies which identify the size, type and tenure of homes required for different groups in the community including disabled people. In the light of consultation responses raising concerns about the delivery of accessible housing, a new policy requirement for delivery of homes that meet the optional access standards is to be introduced. This takes effect by virtue of a footnote that has been added setting out that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing.</p> <p><i>Building a strong, competitive economy (Chapter 6)– as ‘Age’ above</i></p> <p><i>Promoting sustainable transport (Chapter 9) – as ‘Age’ above</i></p>

	<p><i>Making Effective Use of Land (Chapter 11) – as ‘Age’ above</i></p> <p><i>Protecting the Green Belt (Chapter 13) – as ‘Age’ above</i></p>
Race	<p><i>Plan-making (Chapter 3) – as ‘Age’ above</i></p> <p><i>Delivering a wide choice of high quality homes (Chapter 5) – as ‘Age’ above</i></p> <p>It has been considered whether to reference the needs of black and minority ethnic households and other protected groups not currently listed in paragraph 61. It is concluded that it is unnecessary as this is not a closed list and therefore not limited to the named groups.</p> <p><i>Gypsies & Travellers – Read over of revised NPPF policies to Planning Policy for Traveller Sites (PPTS)</i></p> <p>Gypsies and travellers are covered by two different policies: those travellers that fall under the definition in Annex 1 of the Planning Policy for Traveller Sites are covered by that policy; those travellers who fall outside it are covered by the National Planning Policy Framework. As such, all policies outlined under the revised National Planning Policy Framework will apply to settled travellers.</p> <p>Paragraphs 1 of the Planning Policy for Traveller Sites and 4 of the revised National Planning Policy Framework state that these two documents should read in conjunction. To assist this policy read across, changes have been made to the Framework to provide greater explanation on how its new policies are read with the Planning Policy for Traveller Sites. An example of where read-over to the Planning Policy for Traveller Sites advances equality for gypsies and travellers includes the application of the revised plan-making chapter of the Framework, specifically the requirement to plan for strategic policies, which will apply to nomadic gypsy and traveller housing. As these changes are covered by the National Planning Policy Framework and guidance, no direct consequential amendments have been made at this time to the Planning Policy for Traveller Sites.</p>

Gypsies & travellers – Protecting the Green Belt

Some consultation responses to Q41 supported the application of what is now policy 145g to gypsies and travellers. These responses suggested that traveller sites on redundant brownfield land in the Green Belt could be considered appropriate and argued that the lack of consistency of approach was discriminatory. Some responses also stated that if travellers were identified as a local affordable housing need, then policy 145g should apply to gypsies and travellers. Equally, some responses highlighted the need for Green Belt protection.

Paragraph 145 sets out the limited exceptions where new buildings will not be considered as inappropriate development in the Green Belt, including the circumstances in which brownfield land may be re-used. These exceptions do not enable those groups that fall under the Planning Policy for Traveller Sites to create a new site. However, local planning authorities continue to have responsibilities to meet the needs of these covered under the Planning Policy for Traveller Sites. Although the amendments are expected to lead, over time, to an increase in built housing (especially affordable homes) in villages and on brownfield land in the Green Belt, there is no reason to suppose that such land is currently suitable, accessible and available for use as an authorised traveller site by gypsies and travellers. Therefore our assessment is that the policy is unlikely to cause a significant loss of land suitable for traveller sites and does not affect the requirement for local authorities to meet the needs of gypsies and travellers in line with the Planning Policy for Traveller Sites.

Gypsies & travellers – Housing Delivery Test Consequential Impacts

The consequences of the Housing Delivery Test would not apply to gypsies and travellers who fall within the scope of the Planning Policy for Traveller Sites itself. The delivery test is intended to address the gap between site allocations and permissions and the numbers that are actually delivered. As build-out of traveller sites is faster and normally involves smaller sites, speed of delivery is considered to be less of an issue for pitches, and it is therefore considered that not applying the delivery test consequences will not negatively affect gypsies and travellers who fall within the scope of the Planning Policy for Traveller Sites. It is therefore not considered necessary for the Housing Delivery Test consequences to apply to the Planning Policy for

	<p>Traveller Sites.</p> <p><i>Gypsies & travellers – Application of fix of 5 year land supply</i></p> <p>The 5YLS fix will not be applicable to the Planning Policy for Traveller Sites land supply calculation. The 5 year land supply fix is designed to offer certainty to local authorities and communities where the land supply position is close to the housing required in the area, and therefore subject to regular challenge. We are not aware that this is a particular issue for Planning Policy for Traveller Sites land supply. The existing policy on land supply for Planning Policy for Traveller Sites would continue to apply where an authority has fixed their 5 year land supply under the National Planning Policy Framework. No responses to Q41 of the National Planning Policy Framework consultation argued either for or against the application of the 5YLS fix to the Planning Policy for Traveller Sites. Equalities impacts will be kept under review following the publication of the revised National Planning Policy Framework and as part of consideration of amendments to the Planning Policy for Traveller Sites.</p>
Gender	<i>Plan-making (Chapter 3) – as ‘Age’ above</i>
Religion or Belief	no specific impact identified
Sexual Orientation	no specific impact identified
Pregnancy & Maternity	no specific impact identified
Gender Reassignment	no specific impact identified
Marriage and Civil Partnership	no specific impact identified