

Equality analysis for MHCLG Changes to the National Planning Policy Framework

This document records the ongoing analysis undertaken by the **Ministry of Housing, Communities and Local Government (MHCLG)** to fulfil the requirements of the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010. This requires the department to pay due regard to the need to:

1. eliminate discrimination, harassment and victimisation and any other conduct prohibited by the Act
2. advance equality of opportunity between people who share a relevant protected characteristic and those who do not
3. foster good relations between people who share a relevant protected characteristic and those who do not

The protected characteristics which should be considered are:

- age
- disability
- sex
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sexual orientation.

Please note that in relation to the protected characteristic of marriage and civil partnerships, the department is required to have due regard to this only in relation to the first point in the first paragraph above.

SECTION 1

1.1 Policy/Service

New National Planning Policy Framework - context

The National Planning Policy Framework (NPPF) was introduced in 2012 to consolidate the government's planning policies for England. It provides a framework within which locally prepared plans are produced and contains national policies to be considered when dealing with planning decisions and particularly applications for planning permission. When a local authority brings forward a plan, they have a statutory duty to have regard to national policies and the NPPF is therefore drafted with the expectation that plans will be consistent with the policies contained within it. This new NPPF incorporates policies currently set out in the government's Planning Policy for Traveller Sites (PPTS) into the NPPF, to increase clarity and consistency in the planning system. The government's aims in respect of traveller sites, previously set out in the PPTS, have not changed. National Planning Policy for Waste has not changed and is therefore not considered in this assessment. When preparing plans or making decisions on applications relating to waste development, regard should also be had to the policies in the NPPF, where relevant.

The NPPF and PPTS were last updated in December 2024.

This new NPPF sets out a clearer set of policies for both plan-making and decision-making. While many policies reflect the general position in the NPPF 2024, re-drafts have been made to improve clarity and usability. This approach is intended to make national policy easier to understand and apply, rather than to signal a fundamental shift in direction. By presenting policies in a more accessible form, we aim to reduce ambiguity and avoid unnecessary duplication in local plans, while ensuring that national priorities are consistently embedded in decision-making.

A key objective of this revision is to provide a distinct set of national decision-making policies that can be relied upon without repetition in development plans. This clarity will help streamline processes and support delivery. It is proposed that these new decision-making policies will apply on the day of publication of the new NPPF. The new plan-making policies would apply to local plans prepared in the new system which commenced in March 2026. For spatial development strategies the NPPF will apply from the day of publication. For neighbourhood plans the new NPPF will apply to plans submitted to the local planning authority under regulation 15 on or after the date of publication of the final NPPF. The qualifying body may choose to withdraw a neighbourhood plan that has already been submitted and update it to take into account the new NPPF.

The NPPF has been re-structured starting with an introduction followed by procedural policies relating to plan-making and decision-making. This is followed by chapters on

thematic topics containing both plan-making policies and national decision-making policies. The introduction itself has been redrafted to reflect the structure of the NPPF (i.e. the new style plan-making and decision-making policies) and to be clear on the purpose of plan-making policies to inform the preparation of development plans and of decision-making policies as a material consideration in decision-making. These changes are intended to improve the usability of the NPPF overall. The policies in the NPPF apply across England, and the NPPF makes clear that the plan-making policies should be read as a whole in the preparation of plans and that the decision-making policies should be read as a whole. As the NPPF is implemented locally, it is through the application of the NPPF that any impact will be realised and the weight afforded to individual policies may result in a different on-the-ground impact from that set out in this assessment.

In addition to structural improvements, the NPPF includes policy changes to better support sustainable growth through plan-making and decision-making.

Specifically, these include, but are not limited to, changes on:

- a) A permanent presumption in favour of suitably located development. The policy makes clear what forms of development are acceptable in principle in different locations as part of creating a more rules-based approach to development.
- b) Building homes around stations. The policy establishes 'in principle' support for suitable proposals – a "default yes" – for developing land around rail stations within existing settlements, and around 'well-connected' train stations outside settlements, including on Green Belt land. We are also proposing a minimum density of 45 dwellings per hectare around 'well-connected' stations with a service frequency of 8+ trains per hour and 35 dwellings per hectare around 'well-connected' stations with a service frequency of 4 trains per hour, subject to limited exceptions.
- c) Driving urban and suburban densification. We want to get the most use out of suitable land in urban and suburban areas, including through the redevelopment of corner and other low-density plots, upward extensions and infill development – including within residential curtilages. These changes will support higher density development in sustainable locations, with good access to services.
- d) Securing a diverse mix of homes. We want to better support the needs of different groups through the planning system. This includes stronger support for rural social and affordable housing, and setting clearer expectations for accessible housing to meet the needs of older and disabled people. It also means providing more flexibility on the unit mix of housing for market sale, where local requirements have been met for the mix of affordable homes.
- e) Supporting small and medium sites. We want to make it easier to bring forward small sites, through clear support for the principle of development in different locations, the policies on building more densely in settlements and strengthened support for mixed tenure development. We are also introducing a category of 'medium' development (as a subset of major development) linked to a range of policy and regulatory easements, to support a more streamlined and proportionate

planning system.

- f) Streamlining local standards. We want to promote certainty for applicants and speed up local plan production by limiting quantitative standards in development plans to only those where they provide clarity and certainty, are justified by proportionate evidence of local characteristics and needs, and do not duplicate matters already addressed through national standards or other regulatory regimes, except where specific exceptions apply.
- g) Boosting local and regional economies. We want to encourage economic growth by giving substantial weight to the benefits of supporting business growth, and to particular areas and sectors - including those named in the Industrial Strategy, AI Growth Zones, logistics, town centres and agricultural and rural development.
- h) Supporting critical and growth minerals. We want to ensure that adequate provision is made for their extraction, recognising their economic importance. In parallel, and in view of the government's mission to achieve clean power by 2030, we want to restrict further the extraction of coal.
- i) Embedding a vision-led approach to transport. We want to further embed the changes made in December 2024, which signalled the importance of moving away from a 'predict and provide' approach to transport planning that can create unattractive environments dominated by cars.
- j) Better addressing climate change. We set out how decisions can take a proactive approach to both mitigation and adaptation in relation to climate change, in a way that links to other relevant policies in the NPPF.
- k) Conserving and enhancing the natural environment. We are making a number of changes, including to reflect Local Nature Recovery Strategies, to recognise landscape character and conserve and enhance existing natural features, to incorporate swift bricks and to provide guidance on sites of local importance for nature.
- l) Taking a more positive approach to the use of heritage assets. We want a clearer and more positive approach which can better support suitable heritage-related development, replacing the current policies that are difficult to navigate.
- m) Incorporating relevant policies from PPTS into the NPPF.

SECTION 2

2.1 Summary of the evidence considered in demonstrating due regard to PSED

For the purposes of this NPPF PSED assessment, the data the government has collected, over a period, on the housing experience of different households is most relevant here, given planning is a factor affecting different households. In the most up to date English Housing Survey published to date (2024-25 or 2023-24 where more recent data is not yet available), the headline findings on different characteristics were as follows:

- In 2024-25, there were an estimated 25.0 million households in England. Owner occupation is the largest tenure group, with 16.2 million households, representing 65% of all households. The private rented sector accounts for 4.7 million or 19% of households. The social rented sector remains the smallest since 2013-14. It accounts for 4.1 million households (16%).¹
- In 2024-25, 16% of all households had a HRP from an ethnic minority background, a significant increase from 13% five years ago (2019-20). The private rented sector had the largest increase across tenures from 18% in 2019-20 to 30% in 2024-25, followed by the social rented sector from 19% in 2019-20 to 22% in 2024-25). There was no significant increase in the owner-occupied sector (10% in both 2019-20 and 2024-25). Within the social rented sector, in 2024-25 households renting from local authorities were more likely to have a HRP from an ethnic minority background than those renting from a housing association (27% compared to 19%).²
- In 2023-24, there were 1.5 million households in England that contained a concealed household (defined as having at least one additional adult present who would like to buy or rent their own accommodation but could not afford to do so). This represents 6% of households in England. Overall, just over half (54%) of people who were living in a concealed household were aged 16 to 24. 8% of households with an ethnic minority HRP contained at least one adult who was living there because they could not afford to rent or buy elsewhere.
- In 2023-24, households who were the most likely to report difficulties affording their housing costs were in the lower income quintiles, those with dependent children and those based in London.³
- In 2023-24, there were 9.6 million households containing at least one person with a health condition. The proportion of households where at least one person had a health condition increased over the last decade from just under a third of households (32%) in 2013-14 to 35% of households in 2018-19 and then around four in ten households (39%) in 2023-24.⁴
- Overall, households living in a poor-quality home are more likely to contain at least one member with a long-term illness or health condition. Among those living in damp homes, the proportion with an occupant suffering from a health condition increased from around a third (33%) in 2013-14 to just under half (47%) in 2023-24.⁵
- In 2024-25, owner occupiers reported higher scores for life satisfaction (mean of 7.8) than the private rented sector (7.1) and social rented sector (6.8).⁶
- Among outright owners, female single person households were more common than male (25% female compared to 17% male) in 2024-25. The opposite was true for those

¹ English Housing Survey 2024 to 2025: [Chapter 1: Profile of households and dwellings - GOV.UK](#)

² English Housing Survey 2024 to 2025: [Chapter 1: Profile of households and dwellings - GOV.UK](#)

³ [English Housing Survey 2023 to 2024: Experiences of the 'housing crisis' - GOV.UK](#)

⁴ [English Housing Survey 2023 to 2024: health and housing - fact sheet - GOV.UK](#)

⁵ [English Housing Survey 2023 to 2024: health and housing - fact sheet - GOV.UK](#)

⁶ English Housing Survey 2024 to 2025: [Chapter 4: Well-being and loneliness - GOV.UK](#)

in the private rented sectors (18% single male, 15% single female) and those buying with a mortgage (11% male, 9% female). ⁷

- [Traveller caravan count: January 2026 - GOV.UK](#) The total number of traveller caravans in England on the count date in January 2026 was 29,402, an increase of 2,109 (8 %) in comparison with the 27,293 caravans reported in the January 2025 count. Overall, the January 2026 count indicated that 83 % of traveller caravans in England were on authorised land and that 17 % were on unauthorised land.
- There were 4,950 unauthorised caravans, an increase of 934 (23 %) since January 2025. The number of caravans on authorised socially rented sites was 6,479, an increase of 142 (2 %). People who identified as Gypsy or Irish Traveller are over three times more likely to live in overcrowded accommodation than the England and Wales population (26.5% compared with 8.4%) .

The Annual Fuel Poverty Statistics Report (2026, DESNZ) found that in 2025, there were an estimated 9.4% of households (2.36 million) in fuel poverty in England under the Low Income Low Energy Efficiency (LILEE) metric. This is a reduction from 9.9% of households (2.47 million) in 2024. The findings on different characteristics were as follows:

- Ethnicity; The rate of fuel poverty (Household Reference Person (HRP) for ethnicity:
 - Black HRP: 11.8%
 - Asian HRP: 12.0%
 - White HRP: 8.9%
 - Other ethnicity: 13.9%
- Age; Households where the oldest member was aged 16 to 24 years had the highest fuel poverty rate (18.6%) and households with children typically had higher rates of fuel poverty.
- Disability: Income from disability benefits (Attendance Allowance, Disability Living Allowance and Personal Independence Payment) are not included in the fuel poverty income calculation. This reflects that these benefits were specifically given to manage living with a disability. The analysis does not count households as receiving benefits unless they received another benefit in addition to a disability benefit. The share of fuel poor households receiving benefits rises to 67.3% (from 57.6%) if disability benefits are included.

We do not have comparable evidence on gender reassignment, marriage or civil partnership, pregnancy and maternity, religion or belief and sexual orientation in relation to the topics listed above.

The equality analysis has been informed by evidence gathered through the public consultation and related stakeholder engagement, alongside the published data set out above. The consultation specifically invited views on equalities impacts through questions 224, 224a and 225, which asked respondents to identify any potential impacts of the proposals on businesses, any differential impacts on people with relevant protected characteristics under

⁷ English Housing Survey 2024 to 2025: [Chapter 1: Profile of households and dwellings - GOV.UK](#)

the Equality Act 2010, and any appropriate mitigation measures that could inform final policy decisions. Equivalent questions were included in the easy-read version of the consultation at questions 27, 27a and 27b. In total, 399 respondents answered question 224 and 325 respondents answered question 225. Eight responses were received to the easy-read consultation, with four respondents answering question 27, five answering question 27a and five answering question 27b. This evidence has been considered alongside engagement with stakeholders, including where respondents raised specific concerns about potential impacts on protected groups, to inform the assessment of likely impacts and any mitigations reflected in this analysis.

2.2 Assess the impact

This assessment considers evidence set out in section 2.1 on experiences of different households in relation to age, disability, age, race, alongside the proposed policies in the updated NPPF. Where there are data gaps, we have also considered likely impacts from further information and feedback during the consultation stage.

Whilst the general intent of most policies in the NPPF remains unchanged, we are making some policy changes and additions where these can support growth and/or fill gaps in national policy where this can address generic planning issues, to support shorter and locally-focussed development plans. The overall aims of updating the NPPF are intended to achieve a number of objectives, including to make national planning policy, and in turn development plans, more accessible, understandable and clear for everyone who uses them and to support timely and consistent planning decisions. This will in turn have equalities benefits, through making it easier for all interested parties to engage effectively.

There are likely to be neutral to positive impacts on people with protected characteristics as a result of measures in the new NPPF, which are set out in this section. For example, changes to policies that support increased housing delivery may particularly benefit those finding it difficult to access the housing market, including young adults, older people and some ethnic minority groups.

In some instances, however, the proposed changes may lead to adverse impacts on those with protected characteristics. For example, there may be inadvertent discrimination on certain groups, such as older people and those with disabilities, as a result of the move towards the use of digital tools in planning, particularly for those with limited digital access or skills. There also remain some ongoing potential risks of differential treatment relating to traveller sites, which have been raised through the public consultation and engagement with traveller groups. The likely impacts and mitigations of the specific policies that pertain to Gypsies and Travellers are set out below.

Through the mitigations identified in this PSED assessment, and in considering the NPPF

as a whole, it is considered that, on balance, these policies deliver more positive benefits for individuals with protected characteristics and for society overall.

The impact of specific policy changes for each chapter of the NPPF is outlined in detail below, based on the three aims:

1. **Eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the 2010 Act
2. **Advance equality of opportunity** between people who share a particular protected characteristic and people who do not share it
3. **Foster good relations** between the persons who share a relevant protected characteristic and persons who don't share it.

Areas where there are no differential impacts on people with protected characteristics expected as part of these policy changes are also outlined in this section.

Providing access to homes which people can afford, and a range of suitable employment and services, is central to providing opportunities for all and avoiding disadvantage for groups with protected characteristics. Reflecting this, the assessment starts by reviewing the proposed policies for promoting sustainable development, delivering homes and supporting growth, before moving to those designed to support the creation of high quality, sustainable places.

It then moves to the policies for conserving and enhancing the natural environment, as this also matters for everyone, especially as some groups with protected characteristics may have less access to nature than others, or have homes which may be particularly vulnerable to flood risk. The assessment concludes with the procedural policies for plan and decision-making, which are the key transmission mechanisms through which the policies in the NPPF are given effect.

Achieving sustainable development

The aim of these policies is to ensure that the planning system contributes to the achievement of sustainable development. This is a principle that applies across the NPPF, and should be delivered through plan-making and decision-making. There are three overarching objectives to achieving sustainable development, which are economic, social and environmental. The economic objective is to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure, and the social objective is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and

cultural well-being.

Generally, it is expected that the proposed policies will have a positive impact on people with protected characteristics. Evidence on likely impacts will be kept under review.

1. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

The proposals are likely to generally benefit all groups, and have a positive impact on people with protected characteristic, given they are likely to be disproportionately impacted by inadequate economic opportunities and insufficient housing or services. For example, policies S1 and S2 should ensure that development plans (including by identifying site allocations in a spatial strategy) meet needs of their areas, including objectively assessed needs for housing and other uses. This may have significant positive impacts in terms of housing accessibility, for example older people, young adults and some ethnic minority groups.

Policy S5 seeks to approve certain forms of development outside of settlements where sustainable, that may positively impact people with protected characteristics who may benefit from; increased access to affordable housing, such as those who find it difficult to enter the housing market which could likely include young adults, older people and some ethnic minority groups; housing which is located close to railway stations, businesses and facilities in rural areas, such as disabled and older people. Consultation responses raised concerns that policy S5 requires traveller sites to demonstrate unmet need outside of settlements, which was considered to be overly restrictive and could lead to differential outcomes. Concerns were raised about the difficulties of assessing traveller need and the cumulative impacts on site provision, arising from the policies across the Framework. In response to the concerns raised through the consultation, changes to policy HO12 have been made to clarify the demonstration of unmet needs, alongside a commitment to publish guidance on assessing traveller needs. It is intended that this guidance will assist with the demonstration of unmet needs against pitch and plot requirements.

2. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

Broadly these policies look to encourage sustainable development, which includes economic objectives (to help build the economy and infrastructure) and social objectives (ensuring a sufficient number and range of homes, accessible services and open spaces). This is likely to have positive impacts on advancing equality of opportunity.

Policy SD5 provides 'in principle' support to suitable development around well-connected stations. The objective of this policy is to support high density development in sustainable locations, in line with the density requirements set out in policy L3.

It is recognised that minimum density requirements, and higher densities more broadly, are unlikely to be suitable for traveller sites and other lower density forms of accommodation. In recognition of this, Policy L3 has been amended to remove minimum

density requirements for Gypsy and Traveller sites. Further guidance on how the effective use of land for traveller sites can be appropriately achieved will be considered. Policies to support the appropriate provision of traveller sites have also been strengthened – making clear that the development of traveller sites in order to meet evidenced needs will be supported in a range of locations, including outside of settlements and in areas that may not be well related to existing settlements.

3. **Foster good relations** between people who share a particular protected characteristic and people who do not share it.

Broadly these policies look to encourage sustainable development, which includes economic objectives (to help build the economy and infrastructure) and social objectives (ensuring a sufficient number and range of homes, accessible services and open spaces). This is likely to have positive impacts on fostering good relations.

Meeting the challenge of climate change

Climate change presents an urgent and far-reaching challenge, with wide-ranging implications for communities, ecosystems, and the economy. The planning system has a vital role to play in reducing emissions and building resilience to its impacts. Policy changes are proposed to support the transition to net zero by 2050 and to help communities adapt to a changing climate, recognising the cross-cutting nature of climate change. These policies aim to ensure that both climate change mitigation and adaptation are appropriately considered in both plan-making and decision-making.

4. **Eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the 2010 Act.

No forms of unlawful discrimination are considered to arise from the policies in the chapter. However, there are several positive impacts arising from the combination of reframing of existing policies, the new approach to signposting policies across the NPPF to ensure a holistic approach to climate change and the introduction of new policies such as those on wildfire risks, which as a whole create a more comprehensive approach to both climate adaptation and mitigation through the planning system. These policies seek to support mitigation and adaptation to climate change by establishing requirements for plan-making and decision-making to reduce emissions, conserve resources, assess current and future climate risks, and improve the resilience of new development, including for those who may be particularly vulnerable to the impacts of a changing climate.

5. **Advance equality of opportunity** between people who share a particular protected characteristic and people who do not share it.

The combination of new and reframed policies, alongside signposting to other relevant policies within the NPPF, create a more cohesive approach to mitigating and adapting to climate change through planning. This will have a positive impact on improving resilience to the impacts of climate change, including extreme weather events such as overheating, which can disproportionately affect children and older adults, those with underlying health

conditions, pregnant people, and those undertaking periods of fasting due to religious beliefs. They also seek to improve resilience to climate related emergencies such as floods and wildfires, which can present additional and disproportionate challenges for some groups, such as some elderly or disabled persons, to receive timely and appropriate assistance, evacuation or relocation.

The policies also have a positive effect on mitigating climate change by seeking reductions in greenhouse gas emissions and the conservation of resources. By contributing to wider climate change mitigation efforts, the policies may help reduce longer-term climate-related pressures on food production and water resources, which could otherwise affect the affordability of essential goods and services. This may particularly benefit those more likely to experience disproportionate impacts from rising food and water costs including those who may be more likely to be on lower incomes such as the young and elderly, those with disabilities, pregnancy and maternity, and those from ethnic minorities, and on those that may be follow a more restricted diet due to their religion or beliefs. Any such effects are expected to be indirect, cumulative and long term in nature.

6. **Foster good relations** between people who share a particular protected characteristic and people who do not share it.

There are no clear links between this chapter and fostering good relations.

Delivering a sufficient supply of homes

This chapter sets out how authorities should plan for and support the delivery of housing, including traveller sites and the provision of housing for particular groups. It includes changes to give clearer support for the delivery of housing and traveller sites where there are evidenced unmet needs.

7. **Eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the 2010 Act.

This chapter includes a range of policies that will promote a more strategic approach to the planning for and delivery of housing, boost housing supply, and give clear weight to development proposals that will address unmet needs, including needs for affordable housing and social rent. We have also committed to publishing new guidance on the use of cash payments received in lieu of onsite affordable homes ('commuted sums'), to provide further clarity on their deployment and calculation. Taken together, these policies will have a positive impact on housing affordability, which will likely benefit those groups who may find it more difficult to enter the housing market by renting or purchasing. This would be likely to include young people, those with disabilities, older people, and those from some ethnic minority groups. With regards to guidance on commuted sums, this may likely improve the delivery of affordable housing where on-site affordable housing provision may be less viable.

On accessible housing, our proposals expect authorities to set policies to meet or exceed identified need for M4(2) and M4(3) accessible housing on major development, and

specify a minimum proportion of at least 40% of major development to be delivered to the M4(2) standard. These changes are expected to have a positive impact on older and disabled people by driving up the provision of accessible and adaptable, as well as wheelchair accessible, housing. Increasing the housing options available to these groups will help to ensure they do not face discrimination and disadvantage in accessing housing that is suitable to their needs. We have made changes to the policy to make clear that authorities should set out requirements for major development, as opposed to over the plan period. This could reduce the level of homes this applies to, compared to proposals at consultation, given this may not apply to minor development. However, this change will also increase the consistency with which policies apply across the duration and area of the plan, which would prevent the risk that M4(2) requirements are backloaded to later stages of plan delivery, reducing the change of M4(2) developments coming forward. This will also maintain proportionate requirements on small sites, to limit viability impacts and support SME housebuilders. Given that, in the year ending September 2025, over 90% of the housing units granted permission were on major development sites, this approach will apply to the majority of new housing.

Our proposals more clearly require traveller sites needs to be assessed and targets set, at a strategic level. This will help to ensure traveller site need is addressed appropriately, and is expected to support the provision of greater numbers of traveller sites, in line with local needs. These benefits are likely to be delivered in the medium term, as spatial development strategies are developed and local plans implemented.

We have also committed to producing further guidance to assist local authorities in assessing the housing needs of different groups, including for Gypsies and Travellers and older and disabled people, which will help to ensure that housing needs are assessed more accurately and consistently across local areas.

8. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

This chapter includes new requirements that will help to advance equality of opportunity, by requiring specific provision for the needs of particular groups. This will ensure a greater range of appropriate accommodation choices for those currently underserved by the market. The substantial weight we are applying to unmet needs, including unmet needs for social rent homes should improve access to housing, including for younger people and families, and ensure those most reliant on social rent housing can benefit from the stability that a social home can provide.

The consultation explored the benefits and drawbacks of allowing applicants of medium sites to make a financial contribution in lieu of providing onsite affordable homes. The Government has decided not to take the policy forward.

The consultation also sought views on applying a minimum proportion of social rent that should be delivered on new developments, unless otherwise specified in the plan. We are not making changes to the NPPF to introduce this policy at this time, following concerns raised through the consultation that this could have an adverse impact on overall numbers of affordable and social housing, and undermines local flexibility. National requirements also risk duplicating requirements introduced, in 2024, for local plans to set out minimum proportions of social rent to be achieved on major

development. These existing requirements for plans to set out the minimum proportion of social rent that should be achieved should still support the government's ambition to boost the supply of social rent housing, in line with local needs. We will also consider what additional guidance we can provide to assist local authorities in the process of assessing need for social and affordable housing.

We have also reintroduced the Vacant Building Credit, which was removed in error in the consultation draft. Maintaining this policy will continue to allow for reductions in affordable housing to be secured where vacant buildings are being reintroduced, which can reduce the amount of affordable housing required on certain sites. However, the policy helps to encourage development on brownfield sites and support bringing vacant buildings back into reuse, whilst maintaining a proportionate approach to delivering affordable housing on these sites.

Our changes to accessible housing are also expected to advance equality of opportunity by ensuring a greater range of more appropriate accommodation choices for older and disabled people. This includes new requirements for authorities to set out minimum accessibility standards for new development on major sites to meet or exceed identified need, identify sites suitable for providing specialist older persons' housing, and setting policies supporting a more diverse tenure mix. In setting an M4(2) minimum floor, consultation responses raised that there is a risk that the figure will be treated as a target, and a number of respondents have also argued for all new housing to be built to this standard. However, we have been clear that the 40% figure is intended to act as a backstop; the majority of local plans do, and should continue to, set higher targets where necessary to meet identified need. As set out in the consultation response, we have also committed to publish further guidance on assessing older persons' and disabled persons' needs, to ensure that needs assessments are robust.

We have also not proposed requiring a minimum national proportion of M4(3) housing, however plan policies will be required to set their own minimum proportions, based on levels of need, which act to secure these benefits in appropriate ways for different areas. It is considered that the proposals in the revised NPPF strike the appropriate balance between providing a backstop in areas without clear requirements, whilst meeting our overall housebuilding ambitions. We also received many representations in the consultation about the additional costs and challenges of providing M4(3) housing, particularly in certain sites with topographical issues, making it particularly important to maintain flexibility here.

We are removing first homes exception sites as a bespoke form of exception site. This can provide greater incentive for the delivery of affordable homes via rural and community led exception sites, which can support those groups more reliant on affordable homes, and ensure that the mix of affordable housing delivered on exception sites better delivers local needs. Where there is a need for affordable home ownership products, such as discounted market sales housing, these will continue to be able to come forward where this meets local need.

9. **Foster good relations** between people who share a particular protected characteristic and people who do not share it.

Policies to encourage more diverse sites and ensure housing for particular groups is located appropriately could help to foster good relations between different communities. For example, the support for setting proportionate requirements for major development sites can aid in ensuring new developments provide for intergenerational communities, with a mixture of housing types aimed at to provide for the needs of different groups. We have not proceeded with the proposal to set out tenure mixes for sites of 150 units or more, in order to allow for the appropriate mix of tenures required to be considered more flexibly on a site by site basis. We have also introduced new requirements for specialist housing to ensure these come forward in the right locations and with the right access to services, which will help to ensure integration of this accommodation within communities.

The new NPPF (policy HO8) allows applicants to provide affordable homes off-site on an alternative nearby site where this would optimise the quality or quantity of affordable homes built. Some consultation respondents expressed concern that this policy could negatively impact mixed communities, rural and coastal sites. Some pointed out how the shortage of affordable homes in some areas will not be resolved if developers are able to provide the housing too far away from the site. However, it was considered that this could be prevented through provision of sufficient evidence to decision-makers. The policy requirement as consulted on – that affordable homes should be provided onsite unless offsite provision on an alternative nearby site would optimise the quality or quantity of homes built – has been retained.

It is recognised that in relation to medium sites, there could be a higher proportion of single-tenure or fewer mixed-tenure schemes, which may have implications for the development of mixed and integrated communities. However, this risk is considered proportionate and justified, on the basis that such schemes are likely to represent developments that would not otherwise come forward, and therefore support the overall objective of increasing housing supply and access to housing for a wider range of households.

Planning Policy for Traveller Sites

Policies relating to traveller sites are not based on ethnicity. The definition of “Gypsies and Travellers” and “Travelling Show-people” in the NPPF encompass a broad range of groups covering specialist accommodation needs. It is recognised that the policies will mostly impact on Romani Gypsies and Irish Travellers who are recognised as an ethnic group protected under the Equality Act 2010. There is also a positive duty to facilitate the Gypsy way of life.

Policy in relation to the provision of traveller sites was previously set out in Planning Policy for Traveller Sites (PPTS). Following consultation, the new NPPF incorporates the specific policies that relate to the provision of traveller sites in accordance with its overall aims to support the delivery of a substantial increase in the supply of homes and traveller sites, by ensuring that a sufficient amount and variety of land can come forward where needed.

These aims are to be considered in light of the government's wider aim which is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic habit of life of travellers while respecting the interest of the settled community.

These aims are reflected through the objectives and specific plan making and national decision-making policies in the NPPF. We sought views through the consultation on whether the incorporation of the policies have addressed these aims more generally. Impacts arising from specific housing and accommodation policies are set out below.

10. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

Changes have been made to the policy to ensure that traveller site need is assessed, and targets set, at a strategic level, in line with other more general housing. Other changes have been made in the NPPF to ensure that traveller provision is included, where relevant and in light of the consultation responses. The majority of respondents supported the merging of the PPTS in this way, with some arguing that the embedding of Traveller policy could support equitable outcomes. Concerns were however also raised about the likely adverse impacts of settlement policies, those relating to density requirements and the policy on intentional unauthorised development on the Gypsy way of life.

Consultation responses have highlighted concerns over the extent to which assessments of traveller need allow for unmet need to be demonstrated, which could impact on the ability of traveller sites to come forward. 2020 research from Friends, Families and Travellers shows that only 8 out of 68 local authorities in the South East of England identified a 5-year supply of deliverable Traveller sites, which supports claims that the current system creates challenges for assessing and meeting need. Respondents also raised the need for further guidance on how traveller accommodation needs assessments should be undertaken, to ensure needs are not underestimated. To address these concerns, the government has committed to publishing Planning Practice Guidance which will set out in greater detail how authorities should assess and plan to meet need for traveller sites.

A number of respondents have also raised concerns regarding the impact of density requirements around well-connected stations. As discussed above, we have exempted traveller sites from meeting minimum density requirements. As part of our planned update to guidance on traveller sites, we will consider what further guidance may be needed on how traveller sites can make efficient use of land. Together, we believe the combination of guidance on assessments of need as well as the density exemptions will help address the concerns raised by consultees and align, where appropriate, traveller planning policy with that of bricks and mortar housing.

We have also made some changes to the criteria in Policy HO12 in response to feedback at consultation. Some elements of these, such as criteria regarding the impacts of environmental quality on the health and well-being of travellers, risked suggesting different policies applied to traveller sites as opposed to bricks and mortar. We have removed these references to make clear that wider policies regarding ensuring healthy, safe environments for residents will apply to traveller sites. Responses also suggested that clauses referring to not enclosing the site, and providing adequate play areas, would be better considered as part of design guidance. As part of our proposals for guidance on traveller sites, we intend to produce guidance on the design of traveller sites, reflecting the concerns raised through the consultation. We have also removed references to limiting the need for long distance travelling from the policy in response to the consultation.

11. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

Our changes will help to support better and more accurate assessments of traveller need, which can support the provision of traveller sites. This can help to address issues with under provision of traveller sites and reduce the reliance on unauthorised developments and encampments. We have also set clear criteria for how traveller sites should be identified in policy HO12. This responds to feedback from traveller stakeholders that the criteria currently set by local authorities are too restrictive, by replacing these with consistent national criteria. For instance, we have removed references that allow authorities to set policies requiring travellers to demonstrate a lack of alternative accommodation, which do not apply to bricks and mortar development. It also responds to concerns about traveller sites being located in areas of poor environmental quality.

There remain some ongoing risks of potential differential treatment relating to the approach to assessing need for traveller sites, and the lack of supply buffers or delivery tests relating to traveller sites. There are no buffers or Housing Delivery Test (HDT) consequences that are applied to the pitch and plot requirements in the same way as for brick and mortar housing, due to the way in which land comes forward for traveller sites. As highlighted above, additional guidance on this matter should lead to improvements in how need is assessed for Traveller sites, therefore advancing equality of opportunity.

12. Foster good relations between people who share a particular protected characteristic and people who do not share it.

Reliance on unauthorised developments and encampments may increase community tensions. Our changes to better support the delivery of sufficient traveller sites to meet need, including through additional guidance on assessing need, can help to foster good relations by reducing the reliance on unauthorised sites. The presumption of development within settlements could also lead to better integration of traveller sites within existing communities.

Building a strong, effective economy

These policies aim to support businesses and long-term economic growth to bring positive local and national economic impacts which could impact those with the following protected characteristics:

Age and Disability:

- Policy E4 encourages the sustainable growth of businesses, including through measures to retain and expand accessible shops and services. This could have a positive impact on both people with disabilities and elderly people living in rural areas who may be less mobile and are more likely to benefit from services provided by local shops and services.
- Policy E3 sets out that development proposals for freight and logistics should have acceptable impacts on local residents. This is an important safeguard on neighbouring residential uses, particularly for people with protected characteristics as any impacts could have a disproportionate impact on elderly and disabled people who may be more restricted at home because of limited mobility and/or they are unable to work.

13. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

It is not considered that the policies will have a negative impact on the duty to have regard to the elimination of unlawful discrimination. The plan-making policy (E1) sets out that development plans should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing. This would generally benefit all groups, and have a positive impact on people with protected characteristics as they are likely to be disproportionately impacted by inadequate infrastructure and housing.

14. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

It is not considered that the policies will have a negative impact on the duty to have regard to advance equality of opportunity. Broadly these policies look to support businesses and encourage long-term economic growth, this is likely to have positive impacts through new opportunities for employment on people with protected characteristics who are disproportionately likely to have low incomes. The policies also aim to support and expand accessible shops and local services which would likely have positive impacts on people with protected characteristics who may have limited mobility (e.g. older people or people with disabilities).

15. Foster good relations between people who share a particular protected characteristic and people who do not share it.

It is not considered that the policies will have a negative impact on the duty to have regard to fostering good relationships. The policy for freight and logistics sets out that the impacts of proposals on local residents should be acceptable. This is an important safeguard on neighbouring residential uses, particularly for people with protected characteristics as any impacts could have a disproportionate impact on elderly and

disabled people who may be more restricted at home because of restricted mobility and/or they are unable to work. The policies also seek to support rural leisure, tourism and local services which would benefit the local economy and could also give rise to positive impacts on fostering good relations in local areas.

Ensuring the vitality of town centres

We are making changes to the NPPF to boost the vitality and viability of our town centres – policies focus on encouraging mix use development.

16. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

The policies aim to promote a town centre-first approach to the delivery of main town centre uses. This includes encouraging and giving substantial weight in decision making to the intensification of use, including through residential development. The policy changes could therefore have a positive impact on people's access to community facilities. This may positively affect people with protected characteristics. Further, detailed consideration of specific protected characteristics are outlined below:

- **Age:** Provision of more walkable and accessible services and encouraging intensification of use in town centres will increase access to vital services for the elderly and young. In addition to this the expansion of the definition of main town centre uses to include banking and professional services is intended to increase access to in person banking services, which have been in significant decline. The loss of in person banking disproportionately affects the elderly who may struggle to interact with online banking offers.
- **Disability:** The provision of more accessible community services as advocated for by these policies will benefit individuals with a disability. By prioritising the location of main town centre uses within town centres this reduces the need for car use, which would both reduce air pollution which may disproportionately affect those with a disability and, coupled with policies in the Transport chapter promoting accessibility the NPPF will increase equal access to services for individuals with a disability. Encouraging intensification of residential use in town centre locations will also positively impact those with disabilities who will have greater opportunity to live in these areas and increase their access to services.
- **Sex & gender reassignment:** Improving access for all individuals to community services will equally benefit those undergoing sex and gender reassignment.
- **Pregnancy and maternity:** Similarly to those with disabilities, focusing town centre development within town centres will support the consideration of those with limited mobility during pregnancy, postpartum and for those with strollers/carriers for their children in new development proposals.
- **Race, religion or belief & sexual orientation:** Improving access will benefit all individuals, including those looking to access community services such as places of

worship.

17. **Advance equality of opportunity** between people who share a particular protected characteristic and people who do not share it.

This chapter will have a positive impact on advancing equality by improving access to community services for those with protected characteristics.

18. **Foster good relations** between people who share a particular protected characteristic and people who do not share it.

The policies in this chapter will have a positive impact on communities. Improving access to community services within town centres will encourage the integration of those with protected characteristics.

Supporting high quality communications

The amendments to Policies CO1 and CO2 aim to enable the expansion and upgrading of telecommunications networks, including 5G and gigabit-capable broadband, while maintaining safeguards and clarifying the supportive information required. These changes are intended to accelerate delivery and improve digital connectivity across the UK.

The changes are not considered to have a negative 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. Improved infrastructure delivery should benefit communities as a whole, including protected groups within those communities.

19. **Eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the 2010 Act.

It is not considered that the policies will have a negative impact on the duty to have regard to the elimination of unlawful discrimination.

20. **Advance equality of opportunity** between people who share a particular protected characteristic and people who do not share it.

The policy could have a positive impact on those with protected characteristics by reducing disadvantages to those groups through greater digital inclusion, improved connectivity and providing equitable access to digital services – particularly for those living and working in more rural areas where mobile coverage tends to lag behind more urban areas.

21. **Foster good relations** between people who share a particular protected characteristic and people who do not share it.

The telecommunication infrastructure policies aim to improve connectivity which could have a positive impact fostering good relationships.

Securing clean energy and water

Policies are proposed that recognise the importance of energy and water infrastructure, bringing together amended policies on renewable and low carbon energy with two new

policies on planning for energy and water, and on decision-making for water infrastructure.

22. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

No forms of unlawful discrimination are considered to arise from the policies on water and energy.

The introduction of new plan-making policy for energy and water will ensure that development plans are aligned with the capacity and future requirements of energy and water infrastructure, taking into consideration the implications of planned growth, changing consumption patterns, and the impacts of climate change. New decision-making policy for water infrastructure will positively impact on the delivery of water supply, drainage and wastewater infrastructure.

In addition, there are also positive impacts arising from the reframing of the existing energy policies and alongside the introduction of new elements, such as specific references to electricity network infrastructure, as these policies will facilitate the delivery of renewable and low carbon energy developments and electricity network infrastructure.

In combination, it is anticipated that the policies in this chapter will improve energy security, support economic development, contribute towards a net zero future and facilitate the delivery of water infrastructure.

These benefits will have a positive impact on those who may be particularly vulnerable to the impacts of a changing climate and to fluctuations in utility prices and supply.

23. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

The new and reframed policies facilitating the development of energy and water infrastructure will strengthen energy security, support economic growth, and create jobs by enabling investment in clean technologies and resilient networks.

This will have a positive impact on those more likely to experience fuel poverty or to be affected by rising utility prices or supply impacts. This includes those who may be more likely to be on lower incomes, such as the young and elderly, those with disabilities, those who are pregnant or on pregnancy and maternity leave, and those from ethnic minorities⁸.

24. Foster good relations between people who share a particular protected characteristic and people who do not share it.

There are no clear links between this chapter and fostering good relations.

Facilitating the sustainable use of minerals

The policies in this chapter seek to ensure that a sufficient supply of minerals is provided to meet society's needs, while ensuring this is delivered in a manner that does not give rise to

⁸ Department for Energy, Security and Net Zero, [Annual Fuel Poverty Statistics report 2025](#),

unacceptable environmental impacts.

The policy changes support the supply of critical and growth minerals to support economic growth and the transition to a low-carbon economy, recognising their increasing importance in supporting the delivery of green energy, achieving net zero and maintaining national security. Policies also introduce a more restrictive approach to fossil fuel extraction.

Supporting the exploration, extraction and processing of critical minerals may lead to an increase in mineral development activity. Conversely, the transition away from fossil fuels to prevent the risk of negative environmental impacts may lead to a reduction in activity within the coal and onshore oil and gas sectors.

Mineral resources are inherently constrained by geology, and therefore mineral development is often concentrated in particular locations and around specific communities, such as rural villages, market towns and areas with an established history of mineral extraction. This can result in localised environmental effects, including noise, dust and traffic movements, which may affect nearby residents, businesses and local services, particularly where communities are located in close proximity to mineral sites.

Increased mineral activity in an area may give rise to indirect impacts, particularly for people with protected characteristics of age, disability and potentially pregnancy and maternity. These groups may be more sensitive to changes in the local environment, including noise, dust, traffic and impacts on accessibility.

The NPPF addresses these risks through requirements for robust and proportionate assessment, including the consideration of cumulative impacts. It also requires that development does not give rise to unacceptable adverse effects on human health or the environment. This approach, alongside other regulatory regimes, provides appropriate safeguards to manage potential inequalities in impacts while supporting the delivery of minerals.

25. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

There are no clear links between this chapter and the elimination of unlawful discrimination.

26. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

The policies in this chapter seek to ensure the sufficient supply of minerals to provide the infrastructure, buildings, green energy and goods that the country needs. As such, these policies are vital to support increased housing delivery which will benefit young adults who are often disproportionately affected by the housing crisis. People with disabilities may also benefit as more accessible homes are provided.

27. Foster good relations between people who share a particular protected characteristic and people who do not share it.

There are no clear links between this chapter and fostering good relations.

Making effective use of land

Making best use of land is fundamental to the planning system – it allows needs for development to be met efficiently, while safeguarding and improving the environment. Many urban areas in England have been developed at relatively low densities, particularly when compared to continental Europe⁹. In many places, there is potential for higher densities, to better support thriving neighbourhoods, improve access to jobs and services, and make the best use of land within our towns and cities. The policy changes in this chapter seek to capture this potential in two ways - by supporting intensification of land uses in urban areas and setting clear expectations for minimum densities in locations with good transport connectivity. This policy aims to support the government's ambitions to deliver 1.5 million homes and thereby improve access to housing.

Locations with good public transport connectivity can support residential and mixed-use development at higher densities. This is because good connectivity reduces the need to travel, less land is required for parking and road infrastructure, and opportunities for active travel are maximised. As result, higher density development can create sustainable, well-designed places, with good access to jobs and services.

Several amendments have been made to the proposals consulted upon. As updated, the specific policies contained in the chapter include:

- Policy L1: Planning for an effective use of land consolidates plan-making policy in the existing NPPF. It also encourages development plans to identify specific areas suitable for intensification and to set minimum density requirements in locations capable of supporting more efficient use of land, going beyond the baseline requirements of Policy L3.
- Policy L2: Making effective use of land provides strengthened support for certain types of development that support the intensification of built-up areas – including corner plots, redeveloping low density plots, and infill development (including within residential curtilages) and completing gaps in existing rooflines. The policy introduces clear high-level design parameters for such development.
- Policy L3: Achieving appropriate densities introduces an expectation that proposals will contribute to an uplift in density unless there is a clear justification that this is either inappropriate or not possible, and to this end sets minimum density requirements for development around well-connected railway stations, which are defined by a new glossary definition, with different minimum densities applying depending on the frequency of train service. A new definition of 'reasonable walking distance' has been introduced to provide greater clarity and to confirm that the

⁹ <https://www.centreforcities.org/reader/net-zero-decarbonising-the-city/cities-need-to-become-denser-to-achieve-net-zero/>

minimum density requirements apply only to those parts of a site that fall within that distance.

28. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

In seeking to encourage local authorities to optimise the use of allocated sites to provide community facilities that reduce the need to travel (Policy L1), the chapter may help to eliminate unlawful discrimination against those communities which would not otherwise have facilities of their own. This reinforces policies HC1 and HC3 which provides further detail on how community facilities should be planned for.

Traveller sites are often developed at densities lower than those proposed in the policy on land around stations – and these lower densities in many cases help these sites to better accommodate a traveller way of life. To prevent minimum density standards impeding suitable traveller accommodation coming forward (thereby risking indirect discrimination), the government has introduced an exemption from the density standards for traveller sites.

For other protected characteristics, there is much less clear evidence that the policies in this chapter could risk preventing accommodation from being developed which meets the needs of that group. For example, while density standards may impede the provision of bungalows for older people, they bolster support for flatted and communal care older people's accommodation (and received support from providers of such accommodation through the consultation process). In many cases, as covered below, the policies in this chapter may in fact work to increase the supply of accommodation appropriate to specific groups in a way which advances equality of opportunity and helps to eliminate discrimination. Further, as covered below, we have introduced changes to the density policies following consultation to allow flexibility to cater for the needs of these groups.

Policy L3, and related policies GB7 and S5, refer to land within reasonable walking distance of stations. Partly to account for the fact that some groups (such as older and disabled people) may face greater challenges with walking, the new definition of 'reasonable walking distance' explicitly allows for route availability, quality and physical barriers to be considered. The needs of those less able to walk are also supported by other NPPF policy, as are the needs of those unable to walk. Policy HO5 requires local authorities to have greater ambition in the provision of wheelchair-accessible housing, while policies in the transport chapter – in particular TR4 – help to ensure that developments' access arrangements meet the needs of disabled and older people.

Regarding harassment and victimisation, the chapter contains safeguards which aim to ensure that residents and neighbours can maintain acceptable living standards (L2), including designing for factors such as privacy and overlooking which may lessen the capacity for, and impact of, harassment and victimisation between neighbours.

29. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

The overall aim of much of this chapter is to encourage more development, by supporting

high density development in sustainable locations. If effective, this would expand access to housing, and other infrastructure coming forward through mixed use development, with the largest positive effects likely in those groups currently least able to afford or otherwise access appropriate housing. This may help to reinforce the policies in the housing chapter which seek to encourage local authorities to plan for housing for different groups, including affordable provision.

Specific policies in the chapter may also advance equality of opportunity for groups with a protected characteristic. Policy L3, which encourages densification around stations, may advance equality of opportunity for groups who are less able or unable to drive (e.g. children, older people, and those with certain disabilities) by encouraging more housing to be provided in locations which facilitate easier access to public transport– and this is reinforced by policy elsewhere in the NPPF to prioritise walking, wheeling, cycling and public transport (TR1, TR3, CC2). The TTWA threshold which forms part of the criteria for a ‘well connected’ station has increased from top 60 to top 80 TTWAs ranked by economic gross value added. This means that the size of these effects could be greater than what was previously consulted upon. Reductions in the proposed minimum densities (when compared to the consultation draft) may lessen the size of these effects. However, this may be counterbalanced by those reductions making development viable around more stations than previously, which should increase the number of homes built and therefore the effects of the policy.

The consultation also raised concerns that policy L3(2)(a), which states that development proposals should contribute to an increase in the area’s density, could limit the flexibility needed to meet the housing needs of different groups. In response, the government has amended the policy to include a specific exception for sites where it can be demonstrated that meeting the density requirements is either inappropriate or not possible. This change acknowledges that in some circumstances, meeting specific housing needs (such as for older people or families with children) may require development at lower densities. This should broaden the types of housing which can be delivered in many areas, particularly in areas of existing high densities, and better support the needs of groups with protected characteristics.

Concerns were also raised through the consultation regarding the application of minimum density requirements to traveller sites, which together with Policy S5, could give rise to adverse impacts on traveller provision. Following consultation feedback, the revised NPPF provides a specific exclusion for traveller sites (of all sizes) from the minimum density requirements set out in Policy L3. We will also consider further guidance on how the effective use of land for traveller sites can be appropriately achieved.

New policy on upward and other dwelling extensions (L2(1)(d)) may advance equality of opportunity for religious or cultural groups who, in some cases, are more likely to have larger families¹⁰.

¹⁰ <https://www.createstreets.com/wp-content/uploads/2021/12/Tottenham-Paper-1.9.pdf>

30. Foster good relations between people who share a particular protected characteristic and people who do not share it.

The proposals may help to foster good relations between different groups through the creation of higher density, well designed and sustainable communities. Improved access to local services, facilities and employment opportunities could further support this objective.

When combined with policies contained in the housing chapter and elsewhere (e.g. DP3 encouraging mixed communities, and HC1/HC3 encouraging community facilities), the chapter (and particularly policies L1 and L3 which encourage higher densities) may help to create mixed communities in which different groups encounter one another more frequently, helping to foster good relations between them.

This is reinforced by policy L1's encouragement to optimise allocated sites by securing multiple benefits including community facilities; where these community facilities cater primarily or partly to people with a particular protected characteristic (e.g. religion, age, disability, race), this may help to foster good relations between the group sharing that protected characteristic and others.

Protecting Green Belt land

Changes to Green Belt policy include changes to the definition of grey belt, to simplify the process of identifying grey belt land, and other changes aimed at introducing further clarity. These include clearer expectations of how authorities should review Green Belt land, plan for the beneficial use of Green Belt land, and consider development which is not inappropriate in the Green Belt. Changes will also help to support sustainable development in well-connected locations.

The revised NPPF includes a policy to lift the current restriction on the use of site-specific viability assessment on certain types of sites subject to the 'Golden Rules', namely where the development proposal is:

- (i) On previously developed land and demonstrably burdened by costs associated with that previous development which were not taken into account in the viability assessment that informed the development plan;
- (ii) For a strategic site; or
- (iii) For a development which is of a wholly different type to that considered in the viability assessment that informed the development plan.

Where development comes forward following viability assessment, negotiation over developer contributions may affect the tenure and or quantum of affordable housing delivered. However, without the use of viability assessment, schemes are less likely to be delivered. The policy makes clear that significant reductions in affordable housing below Golden Rules requirements will only be acceptable in exceptional cases where fully evidenced and justified.

31. Eliminate unlawful discrimination, harassment, victimisation and any other conduct

prohibited by the 2010 Act.

In making changes to the NPPF in 2024 we sought to ensure that its policies would be applied equally to all those with protected characteristics. In particular we acted to address concerns about the definition of 'gypsies and travellers', to align the NPPF more closely with PPTS and facilitate the traditional and nomadic way of life for Gypsies and Travellers. Changes made to this chapter will continue to support an equitable approach to development in the Green Belt. We are incorporating policy from the PPTS, which currently sets out specific policies relating to traveller sites in the Green Belt, into the wider NPPF. This does not entail any major policy changes in relation to traveller sites in the Green Belt, but incorporation within the wider NPPF could help to eliminate unlawful discrimination. Following consultation feedback, we are ensuring policy GB7(1)(h) applies to traveller sites, alongside bricks and mortar housing, and are making changes to policy L3 to ensure traveller sites are not adversely impacted by proposed density requirements.

32. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

We do not expect the PSED impacts identified in our December 2024 changes to be significantly altered. Our changes predominantly aim at setting out existing policy in a clearer and more rules-based way. This would be expected to benefit all groups involved in the planning system. Ensuring that policies around traveller sites are incorporated into the Green Belt chapter may help to ensure equitable treatment of traveller sites in the Green Belt, by reducing the risk of authorities applying Green Belt policies in differential ways, and mitigating against associated adverse impacts. This can help to advance equality of opportunity between people who share a protected characteristic and those who don't.

New policy making clear development near well-connected stations is not inappropriate in the Green Belt will apply to traveller sites, as well as bricks and mortar. We have also made changes to policy L3, following consultation feedback, to ensure that density requirements in these locations do not adversely impact traveller site development.

Lifting the current restriction on the use of site-specific viability assessment on certain types of sites subject to the 'Golden Rules' would likely enable more sites to come forward, increasing the overall supply of homes, which may advance equality of opportunity for any people who are more likely to benefit from additional housing supply. Where sites come forward following a viability assessment, negotiation over developer contributions is likely to reduce the proportion of affordable housing provided. Overall, however, we expect the impact of increasing supply (including as much affordable housing as is viable on site) to be more beneficial than sites not coming forward at all. In addition, the policy makes clear that significant reductions in affordable housing below Golden Rules requirements will only be acceptable in exceptional cases where fully evidenced and justified.

In addition, the policy may support the provision of older people's housing, and other types of specialist or supported housing, which may advance equality of opportunity for

people based on the protected characteristics of age and disability.

33. Foster good relations between people who share a particular protected characteristic and people who do not share it.

Changes to allow spatial development strategies a clearer role in reviewing Green Belt land could support a more strategic approach to the Green Belt, which could support more strategic planning to meet the needs of underserved groups. Consultation feedback also recognised that the incorporation of policy from PPTS into the NPPF, making specific policies for traveller sites more visible, could also help to ensure all planning needs are treated equitably. These could have an indirect effect on fostering good relations between communities, by tackling prejudice and promoting understanding, if it led to approaches that better supported planning to meet traveller site need.

Achieving well-designed places

The NPPF places emphasis on the planning and development process creating high-quality buildings and places for all users.

The proposed policies are generally expected to have a positive impact on people with protected characteristics, as they will together help provide clarity on how to achieve good design holistically in the planning system and ensure communities benefit from well-designed places that provide a variety of homes for all needs.

In particular, there will be positive impacts in relation to advancing equality of opportunities for the following protected characteristics:

- age
- disability
- sex

34. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

No forms of unlawful discrimination are considered to arise from the policies in the chapter. However, there are a number of positive impacts from the policies in terms of the design of the built environment including supporting integrated communities, promoting social interaction, providing accessible green infrastructure and inclusive public spaces.

35. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

There are a number of areas where the policies in this chapter advance equality of opportunity between those who share a protected characteristic and those who do not including:

- age: the policies have a positive impact on the design of places to provide opportunities for people irrespective of their age. This includes prioritising walking, wheeling and cycling; and including safe, secure, inclusive and accessible public spaces. This may have positive impacts for older people or children as the policies,

such as DP3, support the creation of healthy, mixed, vibrant and integrated communities that provide a range of uses and tenures, employing features which promote social interaction, safe, secure, inclusive and accessible public spaces, and provide recreational spaces and places to meet and participate in public life.

- disability: The policies consider how places can provide opportunities for people with different needs, including different types of disability, sensory impairments and neurodivergence. For example, including safe, secure, inclusive and accessible public spaces, and incorporating / connecting to accessible green infrastructure.
- sex: The policies promote accessible and inclusive public spaces that can improve safety, especially for women and girls. However, we heard through the consultation that because the NPPF does not explicitly refer to the safety of women and girls in line with the government VAWG Strategy there were concerns that this would have a negative impact on this group. Respondents called for a reference to how design can help prevent violence against women and girls in public spaces. We have therefore added new text to policy DP3 to address this.
- race: the policies, including DP3 and the supporting national design guidance promote mixed and integrated communities that incorporate a range of uses and tenures and should be considered when designing for all homes. This may have positive impacts in advancing equality of opportunity for Gypsies and Travellers who would benefit from the wider impacts of well-designed places, including greater access to public spaces which will encourage social interaction. However, interest groups representing Gypsies and Travellers raised concerns about the draft design policies in relation to the absence of specific national design guidance on traveller sites. Similar comments were received as part of the consultation on the draft Design and Placemaking Planning Practice Guidance. We are therefore proposing to include design guidance in any future PPG on traveller sites.

36. Foster good relations between people who share a particular protected characteristic and people who do not share it.

The policies will support fostering good relations, for example through the safe, secure, inclusive and accessible public spaces and through liveable places that promote social interaction. This may help positively contribute to towards tackling prejudice and promoting understanding between those who share a protected characteristic and those who do not.

37. Advertisement consent

The current NPPF paragraph 141 on advertisements was removed from the consultation version due to a desire to focus the NPPF on rules-based decision-making policies. A number of respondents called for the inclusion of a policy requiring the cumulative impact of advertisements to be considered by decision makers. They raised concerns about the impact of outdoor adverts for unhealthy food promotions on those with low incomes and referred to research from Adfree Cities which shows that 82% of outdoor advertising is located in the poorest half of England and Wales.

38. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

We consider that some groups with protected characteristics such as the elderly or those with disabilities, may be more likely to have low incomes and therefore, could be disproportionately affected by the proliferation of outdoor advertisements for unhealthy food in poorer areas. To mitigate this impact, we will amend PPG to ask decision makers to consider the cumulative impact of multiple advertisements in considering applications for advertisement consent.

39. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

The absence of a policy on advertisements is not considered to contribute to this aim.

40. Foster good relations between people who share a particular protected characteristic and people who do not share it.

The absence of a policy on advertisements is not considered to contribute to this aim.

Promoting sustainable transport

The policies on sustainable transport aim to ensure that transport considerations are fully taken into account in the preparation of development plans, as well as the evolution and assessment of development proposals. This includes a vision-led approach to transport to help embed the role that sustainable transport can play in delivering homes and places are well-connected, sustainable, accessible, inclusive and popular.

The policy will positively impact a number of protected characteristics:

- age
- disability
- sex and gender reassignment
- pregnancy and maternity
- race, religion or belief & sexual orientation

For example, the policy TR4 specifically references older people, children, women and girls, other vulnerable groups and those with limited mobility and the chapter specifically includes new reference to wheeling within the definition of sustainable transport modes. The assessment set out below considers the impact on each of the protected characteristics.

41. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

The policies aim to further embed the 'vision-led' approach to transport planning. The policy changes could therefore have a positive impact on people's health and wellbeing (i.e. such as improving access to more active and sustainable transport choices for those living in or near new development), which could positively affect people with protected characteristics. It is acknowledged that while the policies in this chapter seek to promote the provision of a range of sustainable transport modes and move away from private car use, this could potentially impact on individuals and groups with protected characteristics who rely on private transport modes. This has been taken into account and is reflected in

changes to policy. Further, detailed consideration of specific protected characteristics are outlined below:

- Age: 'Older people' and 'children' are explicitly mentioned in Policy TR4(1)(c), which would ensure transport impacts of new development consider such groups and in terms of scheme design. Generally, it is hoped the content of the 'Sustainable Transport' chapter and specific sub policies which enable active and sustainable transport modes would support a reduction in the number of cars or motor vehicles associated with new development and in residential areas, making places safer for younger people, children and the elderly.
- Disability: Policy TR4 specifically mentions people with disabilities, in terms of meeting their needs and in terms of scheme and street design. The focus in the transport chapter on accessibility of sites/schemes, accessibility needs of different users, and access to sustainable transport and to key facilities/services is likely to encourage mobility considerations in plan making and decisions, which will positively impact disabled people and those with specific mobility needs. The transport chapter also includes specific policy on 'wheeling' at TR (1)(d), TR2 (3)(b), TR3 (1)(b) and (e), whereas the current NPPF does not. Wheeling includes the use of wheelchairs, mobility scooters and similar mobility aids as a means of travel. Following consultation feedback we have also amended Policy TR4(1)(c) to specifically refer to 'those with limited mobility', a change which supports the consideration of the needs of disabled people.
- Sex & gender reassignment: The inclusion of safety policy considerations throughout the 'Sustainable Transport' chapter (such as TR4(1)(c), TR4(1)(c) as well as the inclusion of driver welfare and security (as outlined within Policy TR5), would ensure by effect that more vulnerable road and transport users are actively considered through the planning process. Following consultation feedback, we have amended Policy TR4(1)(c) to explicitly include women and girls in relation to arranging streets to create places that are safe but also references other groups who may be vulnerable to crime or the fear of crime which could include the trans community, or people with disabilities, ethnic minority groups or those who may be marginalised due to their sexual orientation (the latter three protected groups are covered by other sub categories in this PSED assessment).
- Marriage or civil partnership: – Based on PSED guidance, this characteristic is only to be considered for policies relating to employment. The transport chapter does not explicitly cover employment policy considerations.
- Pregnancy and maternity - Similar to the impact on those with disabilities, development built to maximise accessibility and connectivity by sustainable transport modes, could support the consideration of those with limited mobility during pregnancy, postpartum and for those with strollers/carriers for their children in new development proposals. This approach could reduce the barriers faced by those who are pregnant or postpartum in using sustainable transport modes and encourage

greater participation in public life of these groups. The 'wheeling' policy considerations could apply to prams and pushchairs, therefore, actively encouraging the consideration of these in new development.

- Race, religion or belief & sexual orientation - While the policy does not speak to these protected characteristics directly, the focus on personal safety and security considerations (as outlined in the 'sex and gender reassignment' subheading of this PSED assessment) would encourage the issues of safety and perceptions of safety for these protected groups to be considered in new development, thus aiming to encourage these protected groups to have greater participation in public life.

42. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

The objective for the sustainable transport policies specifically states that the vision-led approach should be 'inclusive' and 'popular'. Policy TR1 also encourages early engagement with local communities so that proposals reflect local views, which could encourage improved opportunities in the plan making process for community views on transport matters. More generally, the transport policies aim to support the transport infrastructure needs of society and the creation of healthy places. It is likely that people with a number of protected characteristics will experience a positive impact as a result as they may be more likely to access sustainable transport infrastructure and facilities.

43. Foster good relations between people who share a particular protected characteristic and people who do not share it.

It is not considered that the transport chapter will have a positive or negative impact on the duty to have regard to the need to foster good relationships. However, more generally, Policy TR8 includes that opportunities should be taken to extend, link or improve the quality of existing public rights of way routes where this would improve access to green spaces and the countryside. This could therefore encourage uptake of access to places for outdoor recreation which could foster good relations between different groups, including people with protected characteristics.

Promoting healthy communities

The policies seek to promote the creation of healthy and inclusive places and support the provision of appropriate community facilities and public service infrastructure.

The policies are expected to have positive impacts on a range of groups with protected characteristics, including age, disability, sex, pregnancy and maternity, race, religion or belief and sexual orientation.

44. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

These policies specifically seek to support the creation of healthy and inclusive places and is therefore proactive in its approach to eliminate unlawful discrimination.

Policy HC5 which looks to limit hot food takeaways where there is a particular concentration of uses or near to schools, may limit the availability of and access to cheap cooked food offered by hot food takeaways, which may impact certain people with protected characteristics who are more likely to live in deprived areas and/or face poverty and depend on access to cheaper foods. However, we do not have any evidence to suggest that people with protected characteristics are more likely to live near to schools or areas with a high concentration of hot food takeaways that would be disproportionately affected by this policy. This potential effect can be justified as the policy aims to limit the proliferation of hot food takeaways to support public health initiatives relating to obesity and limit anti-social behaviour. In addition, this policy relates to new hot food takeaways – rather than existing premises. We do not think that the recommendation to remove ‘fast food outlets’ from the policy will have any impact on people with protected characteristics as feedback to the consultation suggested that the policy creates uncertainty and is difficult to apply consistently.

The glossary definition of community facilities has been amended to include “cemeteries and burial grounds”. This is expected to have a positive impact in eliminating unlawful discrimination for some groups with protected characteristics of religion or belief and potentially race, where burial practices are connected to faith, cultural or ethnic identity. For some faith and cultural groups burial is the preferred or only acceptable option following death. Recognising cemeteries and burial grounds as community facilities in the NPPF is intended to support their consideration within the planning system and may help local planning authorities identify and plan for facilities that meet the differing needs of local communities.

45. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

There are a number of areas where the policies advance equality of opportunity across protected characteristics as follows:

Age:

- identifying deficits in community facilities and public service infrastructure can help address gaps in services for older people and children, including play areas, education facilities and healthcare
- promotes inclusive and accessible recreational spaces for all ages, including informal play and allotments
- restricting hot food takeaways near schools, supporting healthier environments for children and adolescents

Disability:

- identifying needs for community facilities and public service infrastructure can highlight accessibility gaps in services and infrastructure
- emphasises inclusive design for play and recreation, supporting disabled users
- requires early planning for accessible infrastructure in new developments
- supports new or improved facilities that can be designed inclusively

- protects Local Green Spaces, which may be important for mental health and accessible recreation
- following consultation feedback, we have added the requirement for development plans to identify wider opportunities to reduce health inequalities to policy HC1. We have also added reference to 'wheeling' to HC1 to ensure consistency with other references in the NPPF and this will also result in further inclusivity of the policy.
- in addition, we have added a new criterion to policy HC4 which will require substantial weight be given to the benefits where development proposals would be of particular benefit in promoting good health, preventing ill-health, reducing health inequalities or supporting social interaction in the local community.

Sex:

- promotes walkable, mixed-use areas that can improve safety and reduce isolation, especially for women

Pregnancy and maternity:

- identifying service needs can support maternal health and early years provision
- ensures timely delivery of health and childcare infrastructure in new developments
- supports facilities like health centres and play areas that benefit new parents

Race:

- identifying local health inequalities can help address disparities affecting ethnic minority communities.
- supports culturally specific venues (eg places of worship, cultural centres).
- Supports consideration of culturally specific community needs, including burial practices and access to appropriate cemetery or burial ground provision

Religion or belief:

- explicitly supports places of worship and cultural venues
- supports consideration of the needs of faith and cultural groups for whom burial is the preferred or required practice, including through recognition of cemeteries and burial grounds as community facilities

Sexual orientation:

- new or improved community facilities could support inclusive spaces for LGBTQ+ individuals

46. **Foster good relations** between people who share a particular protected characteristic and people who do not share it.

The policies seek to create inclusive places, which would assist in fostering good relations between different parts of the community.

Pollution, public protection and security

The pollution, public protection and security chapter seeks to ensure that development proposals provide healthy, safe and clean living conditions for all different groups of people, taking into account communities who may be particularly vulnerable to the effects of pollution.

The policies in this chapter are likely to have a disproportionately positive effect on older people, minority ethnic groups, and those with health conditions who are more vulnerable to the effects of pollution.

47. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

These policies seek to reduce discrimination by ensuring that new development provides clean and healthy living conditions for occupiers and users, as well as existing occupiers and residents, considering whether they have characteristics which may make them particularly vulnerable to the impacts of pollution, such as children and older people.

Since the results of the consultation which highlighted concerns particularly for women and girls in relation to crime and fear of crime, we have included consideration of this into the policy. This should help to support those with vulnerable characteristics further.

48. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

Minimising pollution and creating clean and healthy places to live, work and visit for everyone, taking into account vulnerable communities, should help to advance equality of opportunity. There are a number of groups with protected characteristics including older people and minority ethnic groups who suffer disproportionately from the impacts of pollution.

Expanded provisions on safety in relation to women and girls will also help to create safer places for them to live, work and visit, increasing participation in public life and advancing equality of opportunity.

49. Foster good relations between people who share a particular protected characteristic and people who do not share it.

The agent of change policy which helps to ensure that new development is integrated effectively with existing community facilities, will help to reduce tension and conflict between different groups.

Managing flood risk and coastal change

Flood risk and coastal change is a prevalent and pressing issue, especially in light of a changing climate, with significant implications for both people and property. The planning system plays a crucial role in mitigating and adapting to the risk of flooding and coastal change and building resilience to their impacts. It is, therefore, proposed that a standalone chapter be dedicated to policies on this important and complex area.

50. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

There is no clear evidence to suggest that this chapter is likely to directly or indirectly cause unlawful discrimination. The policies seek to support the management of flood risk and coastal change by establishing standard requirements for both plan-making and decision-making which: direct development to areas of lowest flood and coastal change risk; prevent new development from increasing flood risk in other locations; safeguard land for flood and coastal erosion management; implement natural flood management techniques and sustainable drainage systems where needed; assess and adapt to the current and future risks posed by climate change; and generally improve the resilience of new development, including for those who may be particularly vulnerable to the impacts of flooding or coastal change. This includes travellers living in caravans, who may be more vulnerable to such impacts, and as such the policy on flooding in PPTS 13(g) has been carried over in policy HO12(c) to specify that proposed traveller sites should not be located in areas of high flood risk.

51. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

The policies should have a positive impact on resilience to more severe and frequent flooding as a result of climate change; the provision of sustainable drainage systems and the resulting green and blue recreational spaces and improved water storage capacity and quality; and the speed of the planning system and availability of land for development, which can result in increased housing supply and lower accommodation costs. These factors can disproportionately affect those living in lower income households; poor quality housing; temporary accommodation; and/or overcrowded areas; more likely consisting of children, households where the oldest member is aged 16-24, and the elderly; mentally or physically disabled people; single parent households that are predominately headed by women; and some minority ethnic groups. Improved resilience to flooding should also reduce risks to those groups, such as some elderly or disabled persons, who may face additional and disproportionate challenges in receiving timely and appropriate assistance, evacuation, or relocation in the event of a flood^{11, 12}.

The policies are also envisaged to have a positive impact on managing development in areas at risk of coastal change, and safeguarding land to deliver coastal management measures, with coastal communities having disproportionately large numbers of elderly people, who may also face additional challenges in the event of evacuation or relocation.

We do not anticipate the policies will impact the current standards around evacuation

¹¹ Disabled people in the UK face accessibility issues by way of transport, digital exclusion etc., which impacts evacuations, access to emergency information etc. (Gov.uk, Disability Unit & Office for Equality and Opportunity. The lived experience of disabled people in the UK: a review of evidence [Internet]. 17 July 2025. Available from: <https://www.gov.uk/government/publications/the-lived-experience-of-disabled-people-in-the-uk-a-review-of-evidence/the-lived-experience-of-disabled-people-in-the-uk-a-review-of-evidence>).

¹² The elderly and disabled are amongst the worst affected by flooding, facing risks such as disruption to routine needs like medical appointments and access to medication; limited ability to cope with a flooded home due to a shortage of suitable disability-accessible housing; higher likelihood of being impacted by coastal flooding as coastal communities have larger populations of the elderly; and inaccessible communication for people who are hearing-, vision-, or cognitively-impaired. (New Philanthropy Capital, Disability Rights UK, and Re-engage. How will the climate and nature crises impact older people and disabled people [Internet]? 21 June 2023. Available from: <https://www.thinknpc.org/resource-hub/everyones-environment-older-people-and-disabled-people/>)

plans and egress routes in relation to flood events, which can disproportionately impact those with restricted mobility or those who have difficulty understanding and retaining information/instructions, such as the elderly, young children, or parents of young children (particularly those from single parent households which are predominantly headed by women); pregnant people who are most commonly women; and mentally or physically disabled people.

52. **Foster good relations** between people who share a particular protected characteristic and people who do not share it.

Opportunity may arise for the fostering of good relations between those with and without protected characteristics through their shared use of green and blue recreational spaces resulting from the incorporation of more nature-based sustainable drainage systems within development.

Conserving and enhancing the natural environment

Natural environment policies seek to influence the design and location of new development to help drive nature's recovery and contribute to wider environmental outcomes, safeguarding our most important habitats, species and landscapes and recognising the centrality of natural capital to delivering sustainable growth. These measures reflect the government's ambition to build homes and infrastructure, while also conserving and enhancing the environment for future generations.

Although policies are unlikely to have a direct impact on individual protected characteristics, there are some ways that people with protected characteristics of age, disability and race could be indirectly affected.

53. **Eliminate unlawful discrimination**, harassment, victimisation and any other conduct prohibited by the 2010 Act.

There are no clear links between these policies and the elimination of unlawful discrimination.

54. **Advance equality of opportunity** between people who share a particular protected characteristic and people who do not share it.

Age:

- Natural Environment policies seek to increase green infrastructure provision and embed nature recovery through Local Nature Recovery Strategies (LNRS). This will increase access to nature through the application of accessible green standards across all new local plan policies, which evidence has shown can be key to health and wellbeing across all age groups. Furthermore, delivering new homes and infrastructure alongside nature restoration will improve the life chances of younger generations, ensuring development is truly sustainable.

Disability:

- safeguarding current important habitats while also influencing the design and location of new development to drive nature's recovery will present more opportunities for people with disabilities, as well as older age groups with lower mobility, to access

nature closer to their homes.

Race:

- improved access to nature and green infrastructure will also benefit people from ethnic minority backgrounds as evidence shows that they are less likely to have sufficient green infrastructure near their homes, and can suffer disproportionately from negative impacts on health and wellbeing, or a lack of climate resilience.

Increased access to nature through policies in the natural environment chapter set out above may be more limited in certain areas because of the new policy on Biodiversity Net Gain (BNG) (which will limit BNG enhancements beyond the statutory net gain objective to specific site allocations set out in up-to-date development plans and not for sites which are exempt under the statutory BNG regime).

While the BNG policy provides a clearer position on when biodiversity enhancements above the statutory minimum should be sought, some respondents were concerned that this approach may reduce the scale of additional biodiversity enhancements in certain locations. We note that this could have potential to reduce opportunities to target enhanced provision in areas with the greatest need, including locations where communities with protected characteristics currently experience poorer access to nature

55. Foster good relations between people who share a particular protected characteristic and people who do not share it.

Protected Landscapes provide great opportunities for people who share, or do not share, a particular protected characteristic. Natural environment policies seek to safeguard and protect these landscapes and assist decision makers in complying with the Protected Landscapes duty which asks relevant authorities to 'seek to further' the statutory purposes of these areas – including by increasing/promoting opportunities for the understanding and enjoyment by the public of the special qualities of the area.

More broadly, other proposed policies, such as N1, N2, HC1, HC2, H8, GB5, GB8, TR8 may lead to more accessible public green and blue space, which could help to foster good relations by building social bonds and community cohesion.

Conserving and enhancing the historic environment

In respect of the policy goals behind the changes to the chapter, the intention is to shift the emphasis of the chapter to the benefits of heritage-led redevelopment, rather than focusing solely on harm. MHCLG are seeking, in particular, to frame consideration of 'effects' of proposals on heritage assets, on a scale from positive to harm. The concept of 'optimum viable use' has been removed, in an effort to lessen operational uncertainty and explicit references to what we consider important public benefits have been introduced; these changes are aimed at shifting the dial on the redevelopment of vacant listed buildings. MHCLG are keen to ensure that in creating a more positive framing it remains the case that if decision-makers are to follow these policies they would discharge the 'special regard' duties under the Planning (Listed Buildings and Conservation Areas) Act 1990.

We do not anticipate changes to this chapter will result in different outcomes for those with

protected characteristics.

56. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

Heritage planning policy is intended to ensure that the historic environment is appropriately protected for this and future generations to enjoy. The policy will apply in the same way to anyone bringing forward development proposals affecting heritage assets.

57. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

Heritage planning policy is intended to ensure that the historic environment is appropriately protected for this and future generations to enjoy. As such it will benefit everyone, including those with protected characteristics, by helping to create places where people want to live and work.

58. Foster good relations between people who share a particular protected characteristic and people who do not share it.

Heritage planning policy is intended to ensure that the historic environment is appropriately protected for this and future generations to enjoy. As such it will benefit everyone, including those with protected characteristics, by helping to shape the identity of local places and promote community cohesion.

Plan-making policies

The policies within the plan-making chapter are collectively designed to make the plan-making process quicker, more efficient, accessible and transparent. The policies also clarify the role, purpose and content of the different plan types that form the overall development plan for an area.

The policies seek to support the implementation the new plan-making system introduced through the Levelling-up and Regeneration Act 2023, the Planning and Infrastructure Act 2025 (in relation to Spatial Development Strategies) and associated and forthcoming secondary legislation. The government previously consulted on the principles of reform to local plan-making through the 'Consultation on implementation of plan-making reforms' in July-October 2023 and published its response to the consultation in February 2025. The consultation and government response were both subject to consideration of the PSED, meaning that the PSED has been integrated into the principles of plan-making reform and the development of new local plan-making policies from an early stage.

The changes to the plan-making system, including the policies set out in the plan-making chapter will not, in themselves, result in significant direct effects. The changes are primarily focused on the process of preparing plans and their scope, as opposed to the specific policy content of plans itself.

Plan-making policy does however seek to guide the content of plans by, for example, limiting plan content to only matters that are necessary and relevant to the plans being prepared.

Plan-making policy also seeks to minimise plans including policy that duplicates, substantively restates or is inconsistent with the content of the national decision-making policies set out in the NPPF. The policy aims to streamline and simplify local plan-making, however it is recognised that as a result there may be reduced scope for plans to include local decision-making policies, where the policy matter is fully or mainly addressed through national decision-making policies. However, the NPPF does provide flexibility for plan makers to include local context, where it can be demonstrated that it is not addressed through national decision-making policies, and where it wouldn't be inconsistent with national policy. This would allow plans address specific local matters, minimising impacts on equality. In addition, the national decision-making policies themselves have been subject to PSED to assess their potential impact on groups with protected characteristics.

Specific plan making policies also seek to direct the content of particular types of plan – for example policy on the role and content of local plans (PM2) sets out that local plans should contain a vision, a spatial strategy and policies for development amongst other things.

While plan-making policy does seek to direct or guide the overall content and structure of plans, it is the specific content that is determined locally within those plans that may have direct impacts on groups with protected characteristics.

Therefore, the majority of effects will be secondary, resulting from the specific policies included by planning authorities and plan makers in their development plans prepared under the new process. It should also be noted that the preparation of plans that form the development plan is also subject to the PSED requirements meaning that the impact of individual plans will be subject to further scrutiny at a more local level. The changes to the plan-making system process however may have some identifiable impacts as set out below.

Setting standards policy

PM13 aims to provide clarity on the circumstances in which it would be appropriate to set local standards in development plans, balancing our overall aim to streamline and standardise plan-making and decision-making whilst acknowledging that some locally-set standards are appropriate, particularly to respond to relevant evidence of local characteristics and needs. The policy sets out where local standards should not be set in development plans, including in relation to matters already covered by Building Regulations.

59. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act.

The plan-making policies aim to make, in particular, local plan-making faster, clearer, more inclusive, and accessible. These changes aim to better reflect the needs of diverse communities, including those with protected characteristics. Faster plan-making should lead to more up-to-date policies and evidence, supported by meaningful public

engagement.

Having more up-to-date plans in place could, for example, potentially help deliver more homes¹³ and should provide greater certainty in planning for housing needs, including the size, type and tenure of housing needed for different groups in the community. These groups include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes. The plan-making reforms will support getting more plans in place which provide for the needs of different groups. Plans are the best way to appropriately allocate land to meet the needs of different groups in the community, including traveller sites.

The policies will support the rollout of the new system of strategic plans which, in particular, aim to help address cross-boundary strategic issues such as meeting unmet housing need and ensuring better coordination between new development and the delivery of infrastructure. These changes will help to address the needs of the community and protected groups by, for example, supporting the faster delivery of new homes and development and supporting infrastructure.

However, the shorter 30-month timeframe for local plan preparation could indirectly lead to some planning authorities seeking to reduce the range and depth of engagement to ensure the time expectations are met. Coupled with a move towards the use of more digital tools in planning could inadvertently discriminate against certain groups, particularly older individuals, those with disabilities, and people with limited digital access or skills.

We heard specific concerns through the consultation that a faster, more streamlined approach to plan-making could reduce scrutiny and undermine democratic input, because of reduced opportunities to influence a plan during preparation. Respondents noted this could, in particular, disadvantage older people and people with disabilities. We also heard that faster, more frequent plan production could disadvantage those who rely on longer term policy and environmental stability. This was with particular reference to people who are neurodivergent and also people with poor mental health. Concerns were also raised about SDSs taking decisions on development away from local communities.

New policies and guidance on effective and positive community engagement through a range of methods, and on publishing accessible plan documents, along with the introduction of standardised templates to support policies on plan preparation will help mitigate those concerns. It should also be noted that mandatory periods of public consultation on SDSs and local plans will continue to be set out in legislation, and that in the new system of local plan-making the required amount of formal consultation has increased, compared to the 'legacy' system. Furthermore, in the new system there is also

¹³ DLUHC (2022) Levelling Up and Regeneration Bill Impact Assessment, [LevellingUpandRegenerationBillImpactAssessment.pdf](#)

a requirement for local planning authorities, at an early stage in plan-making, to specifically consult stakeholders on how engagement during plan preparation should be carried out. With regard to longer term policy and environmental stability, it is recognised that more frequent plan preparation will mean more frequent changes to local planning policy. However, the chapter notes that plan makers should identify what areas of existing plans may be suitable to take forward for consideration in a new plan. This will help support plan and policy continuity, where appropriate. Overall, it is considered that the wider benefits of having plans prepared more frequently, and kept up to date, will support a more responsive plan-making system that can best reflect the needs of local people.

For spatial development strategies, there will be more limited opportunities for community involvement, including protected groups, however, this is balanced by the fact that there will be further opportunities to influence development during the preparation of local plans which will allocate specific development sites and set out detailed policies, for example, on affordable housing and other development requirements that have a wider community benefit.

The policy option for relevant plan-making authorities to prepare supplementary plans enables the plan-making system to be responsive where unanticipated changes require a streamlined plan-led response, including for minerals and waste, whilst ensuring that the area wide plan-led vision and spatial strategy are not undermined and provide consistency.

For these reasons we do not anticipate that the plan-making policies would have significant adverse effects on groups with protected characteristics, and that our changes will help mitigate and potential concerns. Overall, the policies are likely to have a generally positive impact on all groups.

Setting standards policy

Setting clearer expectations on local planning authorities with regard to accessibility standards, and making clear that development plans can set higher standards in relation to M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings), will allow local planning authorities to plan appropriately for new homes by requiring a higher portion of adaptable homes to be delivered on major development where they are needed to meet the needs of their local area. This could have a positive impact on people with protected characteristics, including those with a disability or older people, who are more likely to require an adaptable home.

We had proposed that local standards should not be set for matters relating to internal layout or construction of buildings unless they are to implement the nationally described space standards. However, in response to consultation feedback, the final version of the policy deletes construction from PM13(1)(c) and allows standards relating to internal layout provided they are justified and meet certain other tests. This has been recommended in response to concerns from respondents that PM13 would limit standards on matters like fire safety, flooding and overheating. Local standards on

matters relating to public safety, would allow LPAs to consider whether certain local standards are necessary to respond to particular local issues or circumstances in their area, which could benefit people with protected characteristics. For example, a local standard on fire safety, in an area of particular high-density development could set expectations on evacuation lifts which would ensure safe egress of people with disabilities or limited mobility (e.g. elderly people, pregnant people or children). Local standards on internal layout can also help to maintain design quality and support amenity and health. Whilst the proposed final policy would introduce new policy expectations on authorities looking to introduce local standards on internal layout (compared to existing policy), we think it strikes an appropriate balance and would have a more positive impact on this principle compared to PM13 as consulted on.

60. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

The chapter sets out policy on the importance of undertaking positive community engagement in plan-making. Public engagement and influence in the preparation of plans should generally allow for equality of opportunity across groups of people with and without specific protected characteristics. The policy emphasises the importance of using a range of methods when consulting with stakeholders. Up-to-date and regularly updated spatial development strategies and local plans should also allow for policies to set requirements for houses, facilities and infrastructure that better meet the needs of the local community, based on more up-to-date and relevant evidence, compared to plans that are out of date, less frequently updated and that often lead to more speculative forms of development.

We heard through the consultation that the approach to identifying land for development set out in policy PM9 will not help support the identification of sites for gypsy and traveller accommodation. The reason given for this was that traditional approaches to land identification, such as 'call for sites', are ineffective in identifying sites for Gypsies and Travellers with more targeted approaches being more suitable. Respondents noted that this could potentially discriminate against Gypsies and Travellers and that additional policy or guidance should be provided to address this matter.

We have recently published new guidance for plan makers when assessing the suitability of land for development. The guidance sets out that the specific accommodation needs of Gypsies and Travellers should be taken into account when considering the suitability of sites for development. We will consider the need for any further guidance on this matter as part of any additional guidance for traveller sites.

With regard to developer contributions, the policy is intended to increase certainty at the plan-making stage, raising the likelihood of infrastructure and affordable housing delivery. Improved provision of infrastructure (e.g. schools and GP surgeries) and affordable housing may advance equality of opportunity between people who share particular protected characteristics, for instance any groups of people who are more likely to require affordable housing (as set out above), or who may require access to (for

example) healthcare infrastructure.

We consider the plan-making policies are generally likely to have positive impacts on advancing equality of opportunity.

Setting standards policy

There are no clear links between this policy and advancing equality of opportunity. This policy provides guidance to plan-makers on how local standards should be set in development plans and it is neutral about advancing equality of opportunity.

61. Foster good relations between people who share a particular protected characteristic and people who do not share it.

The chapter sets out that the preparation of plans allows local communities to influence development in their area, including directing growth to the most appropriate locations, supporting regeneration and conserving and enhancing the quality of the built and natural environment. Whilst no specific direct impact on fostering good relations have been identified, faster plan-making and coverage of up-to-date plans will support development that meets the general needs of the wider local community. This could help support or foster good relations across groups of people with and without specific protected characteristics. Changes to the Neighbourhood Plan policy place greater emphasis on the community's role in positively shaping their area, reflecting local preferences, priorities, and needs. By enhancing the voice of the community, the sources of antagonism and contention in the planning system can be resolved in a way that has cross community consent.

Setting standards policy

This policy provides guidance to plan-makers on how local standards should be set in development plans and it is neutral about fostering good relations between people who share a particular protected characteristic and people who do not share it.

Decision-making policies

The decision-making policies in this chapter cover a range of miscellaneous general policies (the general approach to preparing and deciding planning decisions, information requirements, use of planning conditions and obligations, prematurity of plans, relationship with other regulatory regimes, development viability, enforcement, development orders, and use of Article 4 directions). Many are restatements of existing policy with the NPPF and reflect caselaw. For others where there is a substantive policy change (e.g. preparing and decision planning applications, information requirements), a key underlying objective is to ensure a more proportional and consistent approach is taken.

The potential impacts of the proposed decision-making impacts are considered below against the three aims of this assessment below. This includes consideration of impacts on Gypsies and Travellers.

62. Eliminate unlawful discrimination, harassment, victimisation and any other conduct

prohibited by the 2010 Act.

Generally, these policies do not raise any unlawful discrimination issues. The possible exception which we have considered in more detail in this assessment is policy DM8 on unauthorised development and enforcement. The aim of this policy is to maintain public trust and confidence in the planning system. It sets out factors for local planning authorities' consideration about whether enforcement action is expedient. In response to calls from MPs, local planning authorities and members of the public for further action, it also seeks to strengthen the existing policy on intentional unauthorised development by making clear that where it is concluded, based on evidence, that unauthorised development was intentional, that fact should be given substantial weight in considering whether to grant planning permission.

In general, we do not collect data on types of unauthorised development or those who undertake it, but we are aware from correspondence and engagement with local planning authorities and others that there is a perception that Gypsies and Travellers are more likely to undertake unauthorised development and so might be more impacted by stronger enforcement powers.

From the Count of Traveller Caravans, January 2026, we know that there were 4,950 unauthorised caravans reported in the January 2026 count, an increase of 934 (23 %) since January 2025. Of these, 4,335 were reported on unauthorised developments on land owned by travellers, an increase of 659 (18%), and 615 were on unauthorised encampments on land not owned by travellers, an increase of 275 caravans (81%) from the low figure of 340 caravans recorded in January 2025. Overall, the January 2026 count indicated that 83 % of traveller caravans in England were on authorised land and that 17 % were on unauthorised land.

In reaching decisions on individual cases (whether in relation to retrospective applications or enforcement appeals), decision makers can currently take account of the intentional unauthorised development as a material consideration (in line with the policy contained in 2015 WMS). Other policies and material considerations may also be relevant including for example, the best interests of children (which engages ECHR issues and the UN Convention of the Rights of the Child) or personal circumstances.

The new policy will continue to apply to all types of unauthorised development regardless of who undertakes it. The change to the policy is likely to make it more difficult for planning permission to be obtained in cases where intentional unauthorised development is evidenced and Gypsies and Travellers are likely to be disproportionately impacted from the change. The likely impact of the policy on individual decisions will depend on the facts of the case. Best interests of children will remain as a primary consideration for decision makers as will the ability to weigh matters such as need for traveller sites, and personal circumstances.

Stronger enforcement will benefit the wider community, including those with protected characteristics some of whom, for example the elderly or those with disabilities, might be more adversely affected by unauthorised development.

The consultation sought views on equality impacts of the proposed changes. Responses were received from individuals and organisations representing Gypsies and Travellers. Respondents felt that this group was already disproportionately affected by the current policy on intentional unauthorised development and that this would only be exacerbated by the strengthened policy. They felt the revised policy would take away decision makers' ability to exercise their judgement to consider individual circumstances, including situations of homelessness or lack of lawful alternative sites. Other views included that removing discretion from planning decision-making in this way risks turning planning enforcement into a mechanism of displacement rather than regulation and that enforcement policy should prioritise corrective engagement rather than punitive action.

We have considered the views expressed through the consultation responses. We do not agree that the new policy will take away the decision maker's discretion to weigh matters relating to provision of sites and personal circumstances. It will remain the case that this policy is a material consideration in cases where it is concluded, based on evidence that the unauthorised development was intentional, and will be weighted in the planning balance amongst other material considerations and plan policies. Other factors such as lack of authorised sites and/or personal circumstances will all remain factors which can be taken into account. And where relevant, the best interests of the child will remain a primary consideration. Authorities will have to make decisions in compliance with legal duties that apply to Gypsy and Travellers including the PSED in section 149 of the Equality Act 2010.

In view of this, we do not consider that any changes to the policy are needed [and that action is needed to deal with intentional unauthorised development that undermines confidence and trust in the planning system].

63. Advance equality of opportunity between people who share a particular protected characteristic and people who do not share it.

As stated above, the decision-making policies in this chapter cover a range of miscellaneous general policies, and generally these policies are neutral about advancement of equality of opportunity, for example Policy DM1 which promotes pre-application engagement with neighbours and the local community for major developments. Policy DM8 on unauthorised development and enforcement is a general policy but one in which Gypsies and Travellers could be disproportionately impacted affecting site provision (see reasoning above).

Changes in policy DM10 relating to LPAs using Article 4 directions to prevent over concentration of uses in certain areas, which could include HMOs, may have a limited impact on those with a protected characteristic, who may be more likely to live in a HMO. However, Article 4 directions should be restricted to the smallest geographical area required to mitigate the evidenced harm, thereby limiting any impact.

Policy DM5: Development Viability acknowledges that there may be circumstances in which a viability assessment demonstrates that it would not be possible for development to proceed on a policy compliant basis. The policy clarifies that in such circumstances, the

submission of a viability assessment as part of a development proposal may be justified to ensure that the proposed development makes the maximum possible contribution to affordable housing and other infrastructure.

64. Foster good relations between people who share a particular protected characteristic and people who do not share it.

As stated above, the decision-making policies in this chapter cover a range of miscellaneous general policies, and generally these policies are neutral about fostering good relations. In relation to policy DM8, if this policy was consistently applied by local planning authorities, it could help to foster good relations by helping to deter unauthorised development and ensuring that where it happens it is remedied more quickly, leading to fewer disputes between neighbours and promote community cohesion.

Transitional arrangements

Transitional arrangements will have an effect on the timing of the impacts of policy changes assessed here.

For decision-making, the revised NPPF is proposed to apply from the date the new NPPF is published. This means that the impact of changes on decision-making would be from the date of publication. This is proposed to ensure that the policies in the NPPF, which are reflective of the government's ambitions for planning policy, have an impact in decision-making quickly.

For plan-making, there are provisions made to allow development plans to continue to be progressed on the current version of the NPPF. The balanced decision is based on ensuring that plans that are significantly progressed already, do not have to make changes to reflect the new NPPF, so that they can be adopted as quickly as possible. This reflects the government's position that the plan-led approach is, and must remain, the cornerstone of our planning system. Local plans are the best way for communities to shape decisions about how to deliver the housing and wider development their areas need. In the absence of an up-to-date plan, there is a high likelihood that development will come forward on a piecemeal and speculative basis, with reduced public engagement and fewer guarantees that it will make the most of an area's potential. This will help to ensure that communities can benefit as soon as possible from up-to-date plans that support the delivery of housing, which for some local authority areas, will have a beneficial impact on groups with protected characteristics and the general public. For example, groups such as older people and families with children and people disabilities will benefit through up to date plans and policies providing greater certainty in planning for housing needs of the community, including the size, type and tenure.

The impacts for individual policy proposals are assessed in the specific sections in this PSED assessment and the direct effect of the transitional arrangements will be where these impacts are felt.

.3 Summary of the Analysis

Considering the policy changes overall, there are three key effects which we consider will have a positive impact on people with protected characteristics:

1. A range of changes to policies to support increased delivery of housing development, in particular in well-connected areas - greater housing provision of this kind is anticipated to particularly benefit those more likely to find difficulty accessing the housing market, for example young adults, older people and some ethnic minority groups.
2. Incorporating policies for traveller sites into the NPPF – support the provision of traveller sites.
3. Policy changes which seek to improve resilience to climate issues for example on wildfires, flooding and the natural environment – improvements may disproportionately impact those at greater risk of climate issues such as disabled people, older people and some ethnic minority groups.

There remain some ongoing risks of differential treatment relating to traveller sites, as set out in section 2.2, as well as some areas which may negatively impact older people or disabled people, such as the digitisation of planning. Through the mitigations identified in this PSED assessment and the aims of NPPF policies as read as a whole, we would assess that, on balance, the planning system would deliver more positive benefits for individuals with protected characteristics and on society overall.

The table below summarises where each NPPF policy is anticipated to impact (positively or negatively) the individual protected characteristics, as identified in section 2.2 of this assessment.

	Age	Disability	Sex	Gender reassignment	Marriage & civil	Pregnancy and maternity	Race	Religion or belief	Sexual orientation
Achieving sustainable development	Y	Y	Y	Y	N	Y	Y	Y	Y
Plan-making policies	Y	Y	Y	Y	N	Y	Y	Y	Y
Decision-making policies	N	N	N	N	N	N	Y	N	N
Delivering a sufficient supply of homes	Y	Y	N	N	N	N	Y	N	N
Building a strong, competitive economy	Y	Y	N	N	N	N	N	N	N
Ensuing the vitality of town centres	Y	Y	Y	N	N	Y	Y	N	Y
Promoting healthy communities	Y	Y	Y	N	N	Y	Y	Y	Y
Promoting sustainable transport	Y	Y	Y	Y	N	Y	Y	Y	Y
Supporting high quality communications	N	N	N	N	N	N	N	N	N
Making effective use of land	Y	Y	N	N	N	Y	Y	Y	N

Achieving well-designed places	Y	Y	Y	Y	N	N	Y	Y	N
Protecting green belt land	Y	Y	N	N	N	N	Y	N	N
Meeting the challenge of climate change	Y	Y	N	N	N	Y	Y	Y	N
Managing flood risk and coastal change	Y	Y	Y	N	N	Y	Y	N	N
Conserving and enhancing the natural environment	Y	Y	N	N	N	N	Y	N	N
Pollution, public protection and security	Y	N	N	N	N	N	Y	N	N
Conserving and enhancing the historic environment	N	N	N	N	N	N	N	N	N
Facilitating the sustainable use of minerals	Y	Y	N	N	N	Y	N	N	N
PPTS	N	N	N	N	N	N	Y	N	N
Securing clean energy and water	Y	Y	N	N	N	Y	Y	N	N

NB: 'Y[es]' represents any type of impact, positive or negative

SECTION 3

3.1 Decision Making

The recommendation is to **proceed as planned with the policy or service** through publishing the new NPPF.

We anticipate the changes will promote advancement of opportunity (e.g. through increased home ownership, better environmental outcomes, the provision of infrastructure, and improved opportunities for people across the country). We have determined that the proposed policy changes may disproportionately impact those with protected characteristics. Where potentially negative impacts on people with protected characteristics may arise, we are satisfied with the mitigations which have been built into the policy during development.

3.2 Monitoring arrangements

MHCLG will monitor progress on the reforms using a combination of: metrics already gathered by the department; new metrics that are being created; and robust proxy measures. Regular reports on progress will be submitted to senior officials on the individual and combined impacts.

The equality impacts arising from the changes will be kept under review.

3.3 Sign-off by the decision-maker

Name:

Job Title:

Date: