



Equality Impact Assessment

Title of policy, function or service	Local Plan Part Two, Development Management Policies and Site Allocations. Publication
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Person completing the EIA	Vicky Owen
Type of policy, function or service:	Existing (reviewed) <input type="checkbox"/> New/Proposed <input checked="" type="checkbox"/>
Version	2 (updated from version 1 in 2013)

Introduction

The purpose of this Equality Impact Assessment is to examine the potential impact (whether positive or negative) of Local Plan Part 2 – Site Allocation and Development Management Policies on people with protected characteristics as defined in the Equalities Act 2010 and to identify whether any changes should be made as a result.

The protected characteristics are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership

The first stage of assessment is a screening process to identify any significant potential effects. More detailed assessment is only necessary for significant effect. No significant effects have been identified as a result of the screening of Local Plan Part 2. Minor potential impacts are described in the report below.

This assessment also helps us ensure we are complying with the Public Sector Equality Duty which came into force across Great Britain on 5 April 2011. The duty requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities.

Background

Watford's Local Plan Part 1 (The Core Strategy) was adopted in January 2013, and was subject to its own Equality Impact Assessment. The Core Strategy sets out the overall vision, objectives and spatial strategy for Watford for the period from 2006 to 2031. Local Plan Part 2 (Site Allocations and Development Management Policies) provides more detailed policies and identifies specific sites, for delivering the spatial strategy and vision set out in The Core Strategy.

A screening exercise of Local Plan Part 2 policies was undertaken before the first consultation in December 2013. Each policy was assessed to see if it had a potential positive or negative impact on each of the defined protected characteristics, or whether the impact was neutral / the policy was not relevant. Any significant effects identified require a more detailed assessment.

The assessment found that most policies either had a neutral effect or were not relevant (i.e. that whether a person had one of the protected characteristics or not had no relevance to the impact of the policy). No significant impacts were identified, either positive or negative, which would require further assessment. However there could be some minor impacts.

The policies which were found to have some potential impact at the first consultation stage were:

- Protection and Restoration of River Corridors, Canals and Watercourses – the policy had been amended as a result of the sustainability appraisal to refer to public access. The equalities impact assessment found the wording could be further improved to ensure such public

access was accessible to all, to avoid a potential disadvantage to those with the characteristics of disability and/or pregnancy/maternity. A change to policy wording was therefore made.

- Air Quality – Improvements to air quality may have a more positive effect on anyone suffering from asthma/ similar conditions. Potentially more impact on age and disability.
- Character Areas – encouraging independent retailers could be beneficial in terms of providing specialist shops for people of particular race or religion.
- Public Realm Enhancement – Decluttering and improving streetscape may improve access benefitting those with characteristics of disability or pregnancy/maternity.
- Local Centres and Community Uses - Ensuring local facilities and shops will benefit anyone less able to travel far / without access to a car. Potentially positive on characteristics: age, disability, pregnancy and maternity, sex.
- Housing policies on housing in multiple occupation (HMO) and affordable housing could benefit those in need of affordable housing – but without further information on those in need of HMO accommodation or affordable housing it is difficult to identify which groups would specifically benefit.
- The policy protecting office uses in Clarendon Road could benefit those with a disability by ensuring the availability of jobs in an accessible location.

Revised screening assessment

A further screening exercise has been undertaken ahead of publication to assess whether the situation has changed as policies have evolved and new policies have been included. This also found that there were no policies with significant impacts. Note that some policy names and numbers have changed since the first consultation.

Again, a number of minor potential effects were noted, both positive and negative, primarily in relation to age, disability and pregnancy/maternity as the characteristics most likely to be relevant to the built environment. The overall findings are summarised in the table below, by protected characteristic. Policies not specifically mentioned in the table were found to have a neutral impact or to have no relationship to any of the protected characteristics.

Summary of screening of potential positive and negative impacts on protected characteristics

Protected Characteristic	Positive	Negative	None	Reasons for decision
Age	x			<p>No significant impacts have been identified but there are a number of minor or potential positive impacts arising from policies.</p> <p>Positive impacts</p> <ul style="list-style-type: none"> • Policy SD13 Air Quality improvements to air quality could be of potentially greater benefit to young children or older people or those with asthma/other health conditions. • Policy SD14 Noise potential minor positive for young and old by mitigating the impacts of noise. • Policy TLC7 Restriction on Betting and Money Shop Clusters could have a minor positive benefit in respect of age in that clusters of such uses can deter families from using parts of the town centre. • Policy TLC10 Public Realm Enhancement - the removal of street clutter is likely to make access easier. • Policy TLC11 Restriction of non A1 Uses in Local Centres this policy is intended to encourage local shopping facilities which could benefit anyone unable to travel far or without access to a car • Policy TLC12 Community Facilities similarly this encourages local facilities. • Policy HS11 Older Persons Housing will assist with ensuring appropriate provision for older people. • Policy T7 Provision for car clubs and low emission vehicles could assist with air

Protected Characteristic	Positive	Negative	None	Reasons for decision
				<p>quality and have minor positives as for policy SD13 Air Quality</p> <ul style="list-style-type: none"> • Policy T9 Access and Servicing ensuring ease of access for emergency vehicles could be a minor positive. • Policy UD3 Shopfronts, Advertisements and Signs – as with TLC10 the removal of street clutter through careful design and location of adverts and signs is likely to make access easier which could be of benefit in respect of age. • Policy GI5 Trees, Woodland and Hedgerows planting can improve air quality. • Policy GI6 Protecting and Enhancing the Grand Union Canal requires access for all. • Policy GI7 Protection and Restoration of River Corridors, Canals and Watercourses requires access for all. • Policy GI8 Sports Facilities, open space and children’s play space – ensures suitable provision is made for children and young people.
Disability	x	x		<p>Mainly positive impacts are identified in respect of disability, and again none are considered to be significant. The only potential negative is a possible temporary change in location for or method of delivery of services affected by mixed use allocation MXD1, but in the longer term the proposal is likely to result in an improvement in provision. The temporary impact will need to be carefully managed at the time of planning application and construction to ensure that any effect is mitigated.</p> <p>Positive impacts</p> <ul style="list-style-type: none"> • Policy SPMX2 This policy identifies sites for mixed use developments. One of

Protected Characteristic	Positive	Negative	None	Reasons for decision
				<p>these, MXD1 currently includes the LeMarie Centre, and healthcare facilities. The ‘Lemarie Centre for Charities’ houses 4 charities (Watford Mencap’s Children’s Centre, Wheelchair Dance Sport Association UK, The Stroke Association and Multiple Sclerosis Society), as well as playing regular host to Playskill and several other authority-backed providers of services for children with disabilities. The policy requires that existing facilities are re provided as part of any redevelopment, which is likely to result in an improvement to facilities once development is complete.</p> <ul style="list-style-type: none"> • Policy SD13 Air Quality improvements to air quality could be of potentially greater benefit to those with asthma/other health conditions. • Policy SD14 Noise potential minor positive by mitigating the impacts of noise. • Policy SD15 External lighting –potential minor positive from ensuring sufficient lighting for safety but otherwise minimising light pollution which could affect light sensitive conditions. • Policy TLC10 Public Realm Enhancement – the removal of street clutter is likely to make access easier . • Policy TLC11 Restriction of non A1 Uses in Local Centres – this policy is intended to encourage local shopping facilities which could benefit anyone unable to travel far or without access to a car. • Policy TLC12 Community Facilities – minor positive by supporting local facilities. • Policy HS9 Retention of Affordable Housing – this will benefit anyone needing affordable housing which may disproportionately include people with a disability . • Policies EMP3 Designated Employment Areas, EMP4 Change of Use from B Class

Protected Characteristic	Positive	Negative	None	Reasons for decision
				<p>Outside Designated Areas, EMP5 Clarendon Road/Station Road/Bridle Path Office Area policies designed to protect and provide local employment may be of more benefit to those who are unable or prefer to work closer to home .</p> <ul style="list-style-type: none"> • Policy T6 parking provision the guidance recommends a proportion of disabled parking bays. • Policy T7 Provision for car clubs and low emission vehicles could assist with air quality and have minor positives as for policy SD13 Air Quality • Policy T9 Access and Servicing – ensuring ease of access for emergency vehicles could be a minor positive. • Policy UD3 Shopfronts, Advertisements and Signs – as with TLC10 the removal of street clutter through careful design and location of adverts and signs is likely to make access easier which could be of benefit in respect of disability. • Policy GI5 Trees, Woodland and Hedgerows planting can improve air quality. • Policy GI6 Protecting and Enhancing the Grand Union Canal requires access for all. • Policy GI7 Protection and Restoration of River Corridors, Canals and Watercourses requires access for all. <p>Negative impacts</p> <ul style="list-style-type: none"> • Policy SPMX2 This policy identifies sites for mixed use developments. One of these, MXD1 currently includes the LeMarie Centre, and healthcare facilities. The ‘Lemarie Centre for Charities’ houses 4 charities (Watford Mencap’s Children’s

Protected Characteristic	Positive	Negative	None	Reasons for decision
				Centre, Wheelchair Dance Sport Association UK, The Stroke Association and Multiple Sclerosis Society), as well as playing regular host to Playskill and several other authority-backed providers of services for children with disabilities. There may be a temporary negative impact during redevelopment if facilities need to be relocated for a short time.
Gender Reassignment			✘	No relationship to any policies identified.
Pregnancy/maternity	✘			<p>No significant impacts have been identified but there are a number of potential minor positive effects.</p> <p>Positive impact</p> <ul style="list-style-type: none"> • Policy TLC10 Public Realm Enhancement – the removal of street clutter is likely to make access easier which could be of benefit. • Policy TLC11 Restriction of non A1 Uses in Local Centres – this policy is intended to encourage local shopping facilities which could benefit anyone unable to travel far or without access to a car. • Policy TLC12 Community Facilities – minor positive by supporting local facilities. • Minor positive effects from policies designed to protect and provide local employment including Policy EMP3 Designated Employment Areas, EMP4 Change of Use from B Class Outside Designated Areas, EMP5 Clarendon Road/Station Road/Bridle Path Office Area may be of more benefit to those who are unable or prefer to work closer to home. • Minor positives for disability and pregnancy/maternity for Policy T6 in respect of

Protected Characteristic	Positive	Negative	None	Reasons for decision
				<p>parking provision.</p> <ul style="list-style-type: none"> • T9 Access and Servicing – ensuring ease of access for emergency vehicles could be a minor positive. • UD3 Shopfronts, Advertisements and Signs – as with TLC10 the removal of street clutter through careful design and location of adverts and signs is likely to make access easier. • GI5 Trees, Woodland and Hedgerows planting can improve air quality. • GI6 Protecting and Enhancing the Grand Union Canal and GI7 Protection and Restoration of River Corridors, Canals and Watercourses which both require access for all, of benefit to pregnant women and mothers and to other parents/carers) • GI8 Sports Facilities, open space and children’s play space likely to benefit those with children.
Race	✘			<p>Most policies have no differential impact in terms of race. Policies to support a range of independent shops in the town centre could encourage specialist shops. The Gypsy and Traveller policy will be of particular benefit to that group.</p> <p>Positive impacts</p> <ul style="list-style-type: none"> • Policy TLC9 Character Areas this policy could encourage a greater mix of independent or specialist shops in the town centre. This could potentially be a

Protected Characteristic	Positive	Negative	None	Reasons for decision
				<p>minor benefit in respect of race or religion/belief.</p> <ul style="list-style-type: none"> • Policy GT1 Gypsy and Traveller Provision has a positive in terms of race in providing for the needs of gypsies and travellers.
Religion or belief	✘			<p>Positive impact</p> <ul style="list-style-type: none"> • Policy TLC9 Character Areas – this policy could encourage a greater mix of independent or specialist shops in the town centre. This could potentially be a minor benefit in respect of race or religion/belief.
Sex (gender)			✘	No impact/relationship identified
Sexual orientation		✘		<p>Negative impact</p> <ul style="list-style-type: none"> • The emphasis on creating a family friendly town centre might make gay couples or individuals without children feel excluded. Mitigation is to emphasise through communications that the phrase embraces all different definitions of what constitutes a family and to ensure that any programme of events etc encompasses more than what is perceived to be the traditional family unit

Protected Characteristic	Positive	Negative	None	Reasons for decision
Marriage and civil partnership			✘	No impact/relationship identified

Conclusion

The screening assessment of the Local Plan Part 2 has found that most potential effects on those with the protected characteristics are minor, and most are positive. A more detailed assessment is not necessary at this point. Two potential negatives have been identified. One of these is in connection with the redevelopment at site MXD1. The temporary effect of the redevelopment on delivery of services currently on site (which are to be reprovided as part of any redevelopment scheme) will need to be carefully managed at the time any planning application is determined and implemented. The other relates to the term “family friendly” in regard to the town centre. This concern was raised during the preparation and assessment of Local Plan Part 1 Core Strategy (2013) and a wording change was made to clarify that the Core Strategy Strategic Objective (SO1) relating to a family friendly town centre encompasses providing for “ the needs and aspirations of residents and visitors of all ages, interests and backgrounds”. As indicated in the table above communications and the programme of events will be designed to be inclusive.

This EIA has been approved by:

.....Jane Custance..... Date15 August 2016.....

