

STRATEGIC GROWTH PLAN
EQUALITY & HUMAN RIGHTS IMPACT ASSESSMENT
(EHRIA)
September 2017

Key Details	
Name of policy being assessed:	Leicester and Leicestershire Strategic Growth Plan
Date Started:	June 2016
Date Completed:	September 2017
Project Sponsor:	Eileen Mallon (Charnwood Borough Council)
Lead Officer:	Head of Planning and Regeneration (Charnwood Borough Council)
Team Members:	Principal Planning Officer (Charnwood Borough Council) Planning Policy Manager (Leicester City Council) Corporate Improvement & Policy Officer (Charnwood Borough Council) Policy Officer- Equalities (Leicestershire County Council)

Introduction

This is the Equality and Human Rights Impact Assessment of the Strategic Growth Plan.

All partner organisations involved in the development and implementation of the Strategic Growth Plan have a legal responsibility (as set out in the Equality Act 2010) to ensure that we can demonstrate having paid due regard to the need to (referred to as the 'General Public Sector Equality Duty'):

- Eliminate discrimination, harassment and victimisation and other conduct prohibited by the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not;
- Foster good relations between people who share a protected characteristic and those who do not.

There are certain characteristics that equalities legislation refers to. These 'protected characteristics' include:

1. Age
2. Disability
3. Gender Re-assignment
4. Marriage & Civil Partnership
5. Pregnancy & Maternity
6. Race
7. Religion or Belief
8. Sex
9. Sexual Orientation

Such equalities legislation does not allow the following:

- Direct discrimination, including by association and perception
- Indirect discrimination
- Pregnancy & maternity discrimination
- Harassment
- Third party harassment
- Discrimination arising from disability

Such equalities legislation does allow the following:

- Duty to make reasonable adjustments

Additionally, all partner organisations involved in the development and implementation of the Strategic Growth Plan understand the importance of valuing human rights and are committed to ensuring that the human rights of individuals are maintained and respected. It is for this reason that we have chosen to additionally assess any human rights implications of the Strategic Growth Plan and also consider opportunities to promote or protect any of the relevant human rights within the EHRIA process. These include:

HUMAN RIGHTS ACT PART 1: The Convention – Rights and Freedoms

Article 2: Right to life

- Article 3:** Prohibition of torture, inhuman or degrading treatment
- Article 4:** Prohibition of slavery/ forced labour
- Article 5:** Right to liberty and security of person
- Article 6:** Right to a fair trial (applies to criminal and civil issues)
- Article 7:** No punishment without law
- Article 8:** Right to respect for private and family life
- Article 9:** Freedom of thought, conscience and religion
- Article 10:** Freedom of expression
- Article 11:** Freedom of Assembly and Association
- Article 12:** Right to Marry
- Article 14:** Prohibition of Discrimination (linked to a convention right i.e. equal access to convention rights)

HUMAN RIGHTS ACT PART 2: The First Protocol

Article 1: Protection of property/ peaceful enjoyment

Article 2: Right to education

Article 3: Right to free elections

This is the first stage of the Equality and Human Rights Impact Assessment to be conducted and further assessment of equalities and human right implications will be carried out as a continual process in the preparation of the Strategic Growth Plan. This will be in the form of Equality Impact Assessments/Equality & Human Rights Impact Assessments which will be produced for different aspects of the Strategic Growth Plan and consulted upon at different stages.

This document explains what steps have been taken to understand the potential implications of planning policies on those in our community with the protected characteristics, what steps have been taken to address any differential impacts upon each of the characteristics and human rights articles, and draws upon any recommendations and conclusions.

These points have been covered in the step-by-step approach outlined below.

Section 1: Defining the policy

This assessment should begin by defining and outlining the scope of this policy. You should consider the impact or likely impact of the policy in relation to all areas of equality, diversity and human rights.

1	What is new or changed in this policy? <i>What has changed and why?</i>		
<p>The Strategic Growth Plan is a new policy which will set the vision and strategy for future growth in Leicester and Leicestershire. Its main purpose is to distribute housing and jobs and supporting strategic infrastructure within the Housing Market Area between 2031 and 2050. The Strategic Growth Plan will be a locus for agreement between Local Authorities concerned demonstrating the Duty To Cooperate as well as setting the policy framework for the preparation of individual Local Plans.</p>			
2	Does this relate to any other policy within your department, the Council or with other partner organisations? <i>If yes, please reference the relevant policy or EHRIA. If unknown, further investigation may be required.</i>		
<p>The Strategic Growth Plan will provide an over-arching strategic policy framework for the development plan documents produced by the various authorities that form the Leicester and Leicestershire Housing Market Area. These development plans will each have their own Equality and Human Rights Impact Assessment as part of the process of producing the plans.</p>			
3	Who are the people/ groups (target groups) affected and what is the intended change or outcome for them?		
<p>The Strategic Growth Plan will provide a framework for delivering growth, guiding new developments, and, to overcoming the problems that are experienced by existing communities. On that basis it will affect the whole community and is intended to deliver the right growth, at the right time, in the right locations, creating successful residential and business communities that are well-served by essential infrastructure and services, in a landscape where environmental resources are protected and enhanced.</p>			
4	Will this policy meet the Equality Act 2010 requirements to have due regard to the need to meet any of the following aspects? (Please tick and explain how)		
		Yes	No
Eliminate unlawful discrimination, harassment and victimisation		✓	
Advance equality of opportunity between different groups		✓	
Foster good relations between different groups		✓	
<p>How?</p> <p>All approved projects, procured activity and partners will comply with equalities and human rights legislation through having appropriate policies and practices in place.</p> <p>The way in which the Strategic Growth Plan is developed, in terms of providing housing, employment and other infrastructure, will support the advancement of equality between different groups.</p> <p>The way in which the Strategic Growth Plan is developed, in terms of providing housing, employment and other infrastructure, will support the fostering of good relations between different groups.</p>			

Section 2: Equality and Human Rights Impact Assessment (EHRIA) Screening

The purpose of this section of the assessment is to help decide if a full EHRIA is required. If it has already been identified that a full EHRIA is needed for this policy, either via service planning processes or other means, then please go straight to Section 3 of this document.

Section 2

A: Research and Consultation

5	Have the target groups been consulted about the following?	Yes	No*
	a) their current needs and aspirations and what is important to them;		X
	b) any potential impact of this change on them (positive and negative, intended and unintended);		X
	c) potential barriers they may face		X
6	If the target groups have not been consulted directly, have representatives been consulted or research explored (e.g. Equality Mapping)?	X	
7	Have other stakeholder groups/ secondary groups (e.g. carers of service users) been explored in terms of potential unintended impacts?		X
8	*If you answered 'no' to the question above, please use the space below to outline what consultation you are planning to undertake, or why you do not consider it to be necessary.		
	<p>At this initial stage of the Strategic Growth Plan, research has been undertaken on the demographics of Leicester and Leicestershire to identify trend and gaps in data in order to identify and mitigate any adverse impact upon individuals or community groups based on the protected characteristics.</p> <p>Specific consultation and engagement will be carried out on the Strategic Growth Plan, when it has been endorsed for consultation by the partner authorities. This is expected before the end of 2017. All issues and barriers raised throughout this process will be considered and mitigating action will be taken where reasonable and proportionate.</p>		

Section 2

B: Monitoring Impact

9	Are there systems set up to:	Yes	No
	a) monitor impact (positive and negative, intended and unintended) for different groups;	X	
	b) enable open feedback and suggestions from different communities	X	

Note: If no to Question 9, you will need to ensure that monitoring systems are established to check for impact on the protected characteristics.

Section 2

C: Potential Impact

10	Use the table below to specify if any individuals or community groups who identify with any of the protected characteristics may <u>potentially</u> be affected by this policy and describe any positive and negative impacts, including any barriers.			
		Yes	No	Comments
	Age	X		<p>At this stage, the Strategic Growth Plan has the potential to impact upon age as barriers may be faced by this community group if effective due consideration is not given in the planning and consultation stages.</p> <p>Specific infrastructure and services will need to be planned effectively to ensure it is appropriate for the age demographic of the community (i.e. specific to older people, young people etc.)</p>
	Disability	X		<p>At this stage, the Strategic Growth Plan has the potential to impact upon disability as barriers may be faced by individuals and community groups with physical disabilities, visual impairments, hearing impairments etc. within this community group if effective due consideration is not given in the planning and consultation stages.</p>
	Gender Reassignment		X	<p>At this stage of the Strategic Growth Plan, the likely impacts upon the protected characteristic of gender reassignment are neutral.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p> <p>However, as there are no accurate statistics available regarding the profile of the transgender population within Leicestershire or the UK as a whole, the lack of knowledge for this protected characteristic may be a barrier in itself.</p>
Marriage and Civil Partnership		X	<p>At this stage of the Strategic Growth Plan, the likely impacts upon the protected characteristic of marriage and civil partnership reassignment</p>	

			<p>are neutral.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p>
	Pregnancy and Maternity		<p>X</p> <p>At this stage of the Strategic Growth Plan, the likely impacts upon the protected characteristic of pregnancy and maternity are neutral.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p>
	Race	X	<p>At this stage, the Strategic Growth Plan has the potential to impact upon race as barriers may be faced by specific community groups if effective due consideration is not given in the planning and consultation stages.</p> <p>Specific infrastructure and services will need to be planned effectively to ensure they are appropriate for the demographic of the community (i.e. BME Residents; the gypsy and traveller community).</p>
	Religion or Belief	X	<p>At this stage, the Strategic Growth Plan has the potential to impact upon religion and belief as barriers may be faced by members of specific religious communities if effective due consideration is not given in the planning and consultation stages.</p> <p>Specific infrastructure and services will need to be planned effectively to ensure they are appropriate for the demographic of the community (i.e. appropriate places of worship to meet the needs of the community).</p>
	Sex		<p>X</p> <p>At this stage of the Strategic Growth Plan, the likely impacts upon the protected characteristic of sex are neutral.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p>

	Sexual Orientation		X	<p>At this stage of the Strategic Growth Plan, the likely impacts upon the protected characteristic of sexual orientation are neutral.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p> <p>However, as there are no accurate statistics available regarding the profile of the Lesbian, Gay and Bisexual (LGB) population within Leicestershire or the UK as a whole, the lack of knowledge for this protected characteristic may be a barrier in itself.</p>
11.	<p>Are the human rights of individuals <u>potentially</u> affected by this proposal? Could there be an impact on human rights for any of the protected characteristics? (Please tick)</p> <p>Explain why you consider that any particular article in the Human Rights Act may apply to the policy and how the human rights of individuals are likely to be affected below: [NB. Include positive and negative impacts as well as barriers in benefiting from the above proposal]</p>			
	Yes	No	Comments	
Part 1: The Convention- Rights and Freedoms				
Article 2: Right to life		X		
Article 3: Right not to be tortured or treated in an inhuman or degrading way		X		
Article 4: Right not to be subjected to slavery/ forced labour		X		
Article 5: Right to liberty and security		X		
Article 6: Right to a fair trial	X		<p>This may potentially have an impact upon the human rights of individuals, particularly when considering:</p> <ol style="list-style-type: none"> 1. The right to make representations against decisions affecting people's rights within the planning process. 2. In relation to any enforcement proceeding surrounding planning activity. 	

			It will therefore be necessary to build in the necessary procedures to any process of awards, appeals or decisions.
Article 7: No punishment without law		X	
Article 8: Right to respect for private and family life	X		This may potentially have an impact upon the human rights of individuals, particularly when considering: <ul style="list-style-type: none"> ▪ Handling environmental issues such as pollution. ▪ Cultural and religious needs of service users- particularly when scheduling consultation activity etc. with service users ▪ Immigration/ asylum issues ▪ Gypsy & traveller rights with the Strategic Growth Plan
Article 9: Right to freedom of thought, conscience and religion	X		This may potentially have an impact upon the human rights of individuals, particularly when considering the timetabling/ scheduling of events for any consultation activity. It will therefore be necessary for awareness to avoid holding events/ timings within the Plan which clash.
Article 10: Right to freedom of expression	X		This may potentially have an impact upon the human rights of individuals, particularly when considering consultation on planning/ housing decisions etc. All individuals must have a right to freedom of expression surrounding the Strategic Growth Plan.
Article 11: Right to freedom of assembly and association		X	
Article 12: Right to marry		X	
Article 14: Right not to be discriminated against	X		This may potentially have an impact upon the human rights of individuals. All individuals must have a right not to be discriminated against throughout the development and implementation of the Strategic Growth Plan.
Part 2: The First Protocol			
Article 1: Protection of property/ peaceful enjoyment	X		This may potentially have an impact upon the human rights of individuals, when planning decisions are made. Where possible a public authority should try to ensure that policies or decisions do not interfere with peaceful enjoyment of property of possessions.

	Article 2: Right to education		X	
	Article 3: Right to free elections		X	

Section 2				
D: Decision				
12.	Is there evidence or any other reason to suggest that:	Yes	No	Unknown
	a) this policy could have a different affect or adverse impact on any section of the community;			X
	b) any section of the community may face barriers in benefiting from the proposal			X
13.	Based on the answers to the questions above, what is the likely impact of this policy?			
	No Impact <input type="checkbox"/>	Positive Impact <input type="checkbox"/>	Neutral Impact <input type="checkbox"/>	Negative Impact or Impact Unknown <input checked="" type="checkbox"/>
Note: If the decision is 'Negative Impact' or 'Impact Not Known' an EHRIA Report is required.				
14.	Is an EHRIA report required?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

Section 3: Equality and Human Rights Impact Assessment (EHRIA) Report

This part of the assessment is to think thoroughly about the impact of this policy and to critically examine whether it is likely to have a positive or negative impact on different groups within our diverse community. It is also to identify any barriers that may detrimentally affect under-represented communities or groups, who may be disadvantaged by the way in which we carry out our business.

Using the information gathered either within the EHRIA Screening or independently of this process, this EHRIA Report should be used to consider the impact or likely impact of the policy in relation to all areas of equality and human rights.

Section 3

A: Research and Consultation

When considering the target groups it is important to think about whether new data needs to be collected or whether there is any existing research that can be utilised.

- 15.** Based on the gaps identified either in the EHRIA Screening or independently of this process, how have you now explored the following and what does this information/data tell you about each of the diverse groups?
- a) current needs and aspirations and what is important to individuals and community groups (including human rights);
 - b) likely impacts (positive and negative, intended and unintended) to individuals and community groups (including human rights);
 - c) likely barriers that individuals and community groups may face (including human rights)

Research has been undertaken on the demographics of Leicester and Leicestershire to identify trend and gaps in data in order to identify and mitigate any adverse impact upon individuals or community groups based on the protected characteristics.

Utilising the demographic information collected for the Leicester & Leicestershire area, a working group considered this alongside the proposed options to determine areas of inequality or where barriers may occur in certain circumstances (see Appendix A for further details on the diverse groups).

- 16.** Is any further research, data collection or evidence required to fill any gaps in your understanding of the potential or known affects of the policy on target groups?

Specific research, data collection or evidence will be carried out on the Strategic Growth Plan when it has been endorsed for consultation by the partner authorities. This is expected before the end of 2017. All issues and barriers raised throughout this process will be considered and mitigating action will be taken where reasonable and proportionate.

When considering who is affected by this proposed policy, it is important to think about consulting with and involving a range of service users, staff or other stakeholders who may be affected as part of the proposal.

17.	Based on the gaps identified either in the EHRIA Screening or independently of this process, <u>how</u> have you further consulted with those affected on the likely impact and <u>what</u> does this consultation tell you about each of the diverse groups?
Specific consultation and engagement will be carried out on the Strategic Growth Plan when it has been endorsed for consultation by the partner authorities. This is expected before the end of 2017. All issues and barriers raised throughout this process will be considered and mitigating action will be taken where reasonable and proportionate.	
18.	Is any further consultation required to fill any gaps in your understanding of the potential or known effects of the policy on target groups?
It will be important to ensure that wherever new development is focused that potential or actual barriers are given due consideration is given in the planning and consultation stages of local plans.	

Section 3 B: Recognised Impact							
19.	<p>Based on any evidence and findings, use the table below to specify if any individuals or community groups who identify with any 'protected characteristics' are <u>likely</u> be affected by this policy. Describe any positive and negative impacts, including what barriers these individuals or groups may face.</p> <table border="1" data-bbox="284 1008 1468 1986"> <thead> <tr> <th data-bbox="284 1008 769 1079"></th> <th data-bbox="769 1008 1468 1079">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="284 1079 769 1868">Age</td> <td data-bbox="769 1079 1468 1868"> <p>The Strategic Growth Plan has the potential to impact negatively upon age in most of the scenarios tested and it will be important to ensure that specific infrastructure and services are planned effectively to ensure they are appropriate for the age demographic of the community (i.e. specific to older people, young people etc.) - this is likely to be an issue for subsequent local plans.</p> <p>Of the options tested, only options 4 and 5 presented a neutral outcome. For option 4, the potential for a 'sense of community' to be developed over time was seen as a positive way to plan for all from the outset.</p> <p>For option 5, a dispersed strategy would provide more affordable housing in rural communities but recognises this is only an advantage if there is access to motorised transport to access higher order services elsewhere.</p> </td> </tr> <tr> <td data-bbox="284 1868 769 1986">Disability</td> <td data-bbox="769 1868 1468 1986">The Strategic Growth Plan has the potential to impact positively upon disability in most of the options tested with neutral effects recorded in</td> </tr> </tbody> </table>		Comments	Age	<p>The Strategic Growth Plan has the potential to impact negatively upon age in most of the scenarios tested and it will be important to ensure that specific infrastructure and services are planned effectively to ensure they are appropriate for the age demographic of the community (i.e. specific to older people, young people etc.) - this is likely to be an issue for subsequent local plans.</p> <p>Of the options tested, only options 4 and 5 presented a neutral outcome. For option 4, the potential for a 'sense of community' to be developed over time was seen as a positive way to plan for all from the outset.</p> <p>For option 5, a dispersed strategy would provide more affordable housing in rural communities but recognises this is only an advantage if there is access to motorised transport to access higher order services elsewhere.</p>	Disability	The Strategic Growth Plan has the potential to impact positively upon disability in most of the options tested with neutral effects recorded in
	Comments						
Age	<p>The Strategic Growth Plan has the potential to impact negatively upon age in most of the scenarios tested and it will be important to ensure that specific infrastructure and services are planned effectively to ensure they are appropriate for the age demographic of the community (i.e. specific to older people, young people etc.) - this is likely to be an issue for subsequent local plans.</p> <p>Of the options tested, only options 4 and 5 presented a neutral outcome. For option 4, the potential for a 'sense of community' to be developed over time was seen as a positive way to plan for all from the outset.</p> <p>For option 5, a dispersed strategy would provide more affordable housing in rural communities but recognises this is only an advantage if there is access to motorised transport to access higher order services elsewhere.</p>						
Disability	The Strategic Growth Plan has the potential to impact positively upon disability in most of the options tested with neutral effects recorded in						

	<p>option 4 and neutral/negative effects in option 5.</p> <p>Depending on the option selected, different spatial options may focus development in areas that favour disabled people by virtue of access to jobs, services and facilities where their needs can be met. It will be important to ensure that wherever new development is focused that barriers may be faced by this community group if effective due consideration is not given in the planning and consultation stages of local plans.</p>
Gender Reassignment	<p>At this stage of the Strategic Growth Plan, the effects upon the protected characteristic of gender reassignment are not considered likely to have an impact.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p> <p>However, as there are no accurate statistics available regarding the profile of the transgender population within Leicestershire or the UK as a whole, the lack of knowledge for this protected characteristic may be a barrier in itself.</p>
Marriage and Civil Partnership	<p>At this stage of the Strategic Growth Plan, the effects upon the protected characteristic of marriage and civil partnership are not considered likely to have an impact.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p>
Pregnancy and Maternity	<p>At this stage of the Strategic Growth Plan, the likely impacts upon the protected characteristic of pregnancy and maternity are neutral.</p> <p>The assessment identified marginal positive effects for option 1 and option 6 as they seek to concentrate growth in areas that already benefit from higher order services and facilities that is likely to offer greatest support for this group.</p>
Race	<p>The Strategic Growth Plan has the potential to impact upon race as barriers may be faced by specific community groups if effective due consideration is not given to the specific infrastructure and services required to create</p>

		<p>mixed and balanced communities.</p> <p>This is a negative effect for option 4 and 5 although positive effects are recorded in option 1, 3 and 7. It will be necessary to plan effectively in local plans to ensure new developments have appropriate community infrastructure for the demographic of the community (i.e. BME Residents; the gypsy and traveller community).</p>
	Religion or Belief	<p>The assessment of options presents a mixed outcome for this characteristic. It reflects the reality that areas of higher population are more likely to be able to support a wider range of faith communities and buildings compared to lower populated areas.</p> <p>Specific infrastructure and services will need to be planned effectively to ensure that the needs of faith groups are addressed in local plans.</p>
	Sex	<p>The assessment records that the impacts upon the protected characteristic of sex for each of the options is neutral.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p>
	Sexual Orientation	<p>The assessment records that the impacts upon the protected characteristic of sexual orientation for each of the options is neutral.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p> <p>However, as there are no accurate statistics available regarding the profile of the Lesbian, Gay and Bisexual (LGB) population within Leicestershire or the UK as a whole, the lack of knowledge for this protected characteristic may be a barrier in itself.</p>
	Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities, community cohesion	<p>The assessment records that the impacts upon the protected characteristic of other groups for each of the options is neutral.</p> <p>It is predicted that potential barriers are unlikely to be faced by this protected characteristic.</p>

20.	Based on any evidence and findings, use the table below to specify if any particular Articles in the Human Rights Act are <u>likely</u> apply to your policy. Are the human rights of any individuals or community groups affected by this proposal? Is there an impact on human rights for any of the protected characteristics?	
		Comments
	Part 1: The Convention- Rights and Freedoms	
	Article 2: Right to life	No Impact
	Article 3: Right not to be tortured or treated in an inhuman or degrading way	No Impact
	Article 4: Right not to be subjected to slavery/ forced labour	No Impact
	Article 5: Right to liberty and security	No Impact
	Article 6: Right to a fair trial	Neutral impact - the plan-making process has been carried out in consultation with the public and stakeholders. It will be important to ensure that the subsequent local plans are prepared in a transparent and equitable way and are subject to Examination in Public.
	Article 7: No punishment without law	No Impact
	Article 8: Right to respect for private and family life	Positive effect - this option may potentially have an impact upon the human rights of individuals, particularly Gypsy & Traveller rights.
	Article 9: Right to freedom of thought, conscience and religion	This may potentially have an impact upon the human rights of individuals, particularly when considering the timetabling/ scheduling of events for any consultation activity. It will therefore be necessary for awareness to avoid holding events/ timings within the Plan which clash.
	Article 10: Right to freedom of expression	Neutral impact – the plan-making process has been carried out in consultation with the public and stakeholders. It will be important to ensure that the subsequent local plans are prepared in a transparent and equitable way and are subject to Examination in Public.
	Article 11: Right to freedom of assembly and association	No Impact
	Article 12: Right to marry	No Impact
Article 14: Right not to be discriminated against	This may potentially have an impact upon the human rights of individuals. All individuals must have a right not to be discriminated against throughout the development and implementation of the Strategic Growth Plan.	
Part 2: The First Protocol		

	Article 1: Protection of property/ peaceful enjoyment	This may potentially have an impact upon the human rights of individuals when planning decisions are made. New development may require the use of compulsory purchase powers. Where possible a public authority should try to ensure that policies or decisions do not interfere with peaceful enjoyment of property of possessions.
	Article 2: Right to education	No Impact
	Article 3: Right to free elections	No Impact
Section 3 C: Mitigating and Assessing the Impact		
Taking into account the research, data, consultation and information you have reviewed and/or carried out as part of this EHRIA, it is now essential to assess the impact of the policy.		
21.	If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is <u>justifiable</u> or <u>legitimate</u> and give reasons.	
<p>A) The Strategic Growth Plan has the potential to impact negatively upon age in most of the scenarios tested and it will be important to ensure that specific infrastructure and services are planned effectively to ensure they are appropriate for the age demographic of the community (i.e. specific to older people, young people etc.) this is likely to be an issue for subsequent local plans.</p> <p>B) The Strategic Growth Plan has the potential to impact upon race as barriers may be faced by specific community groups if effective due consideration is not given to the specific infrastructure and services required to create mixed and balanced communities. This is a negative effect for option 4 and 5 although positive effects are recorded in option 1, 3 and 7. It will be necessary to plan effectively in local plans to ensure new developments have appropriate community infrastructure for the demographic of the community (i.e. BME Residents; the gypsy and traveller community).</p> <p>C) The assessment of options presents a mixed outcome for religion and belief. It reflects the reality that areas of higher population are more likely to be able to support a wider range of faith communities and buildings compared to lower populated areas. Specific infrastructure and services will need to be planned effectively to ensure that the needs of faith groups are addressed in local plans.</p>		
<p>N.B.</p> <p>i) If you have identified adverse impact or discrimination that is <u>illegal</u>, you are required to take action to remedy this immediately.</p> <p>ii) If you have identified adverse impact or discrimination that is <u>justifiable</u> or <u>legitimate</u>, you will need to consider what actions can be taken to mitigate its effect on those groups of people.</p>		
22.	Where there are potential barriers, negative impacts identified and/or barriers or impacts are unknown, please outline how you propose to minimise all negative impact	

	<p>or discrimination.</p> <ul style="list-style-type: none"> a) include any relevant research and consultations findings which highlight the best way in which to minimise negative impact or discrimination b) consider what barriers you can remove, whether reasonable adjustments may be necessary, and how any unmet needs that you have identified can be addressed c) if you are not addressing any negative impacts (including human rights) or potential barriers identified for a particular group, please explain why
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As described in section 21 above.

Section 3
D: Making a decision

23.	Summarise your findings and give an overview as to whether the policy will meet all responsibilities in relation to equality, diversity, community cohesion and human rights.
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It is the opinion that the Strategic Growth Plan will comply with equality, diversity and human rights responsibilities. Where potential barriers are identified at this stage, it is recognised that it will be necessary to plan effectively in local plans to ensure new developments have appropriate community infrastructure for the demographics of the community.

We will continue to undertake analysis and monitoring to ensure discrimination and adverse impact does not occur.

Section 3
E: Monitoring, evaluation & review of your policy

24.	Are there processes in place to review the findings of this EHRIA and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact?
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The findings of this EHRIA will be reviewed by the Strategic Planning Group when considering the proposals to take forward and endorse. It is expected that all recommendations made by this Board will be addressed in relevant local plans and monitored by the relevant local authority, as appropriate.

25.	How will the recommendations of this assessment be built into wider planning and review processes? <i>e.g. policy reviews, annual plans and use of performance management systems</i>
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All recommendations made by this Board will be addressed in relevant local plans and monitored by the relevant local authority, as appropriate.

**Section 3:
F: Equality and human rights improvement plan**

Please list all the equality objectives, actions and targets that result from the Equality and Human Rights Impact Assessment (EHRIA) (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Action	Officer Responsible	By when
EHRIA to be considered by the Strategic Planning Group when determining the preferred options proposal and in further consultation.	Strategic Planning Group.	November 2017.
EHRIA to be reviewed by the Project Group in light of responses arising from consultation on the draft plan and submitted to the Strategic Planning Group for consideration when determining the final version of the Strategic Growth Plan.	Project Group	Spring 2018
Recommendations made within the assessment by the Strategic Planning Group to be addressed in relevant local plans.	Planning leads in all Local Authorities.	As appropriate.
All equalities impact to be monitored by the relevant local authority, as appropriate.	Planning leads in all Local Authorities.	As appropriate.

Section 4: Sign off and scrutiny

Upon completion, the Lead Officer completing this assessment is required to sign the document in the section below.

It is required that this Equality and Human Rights Impact Assessment (EHRIA) is also signed off by the project sponsor.

Once scrutiny and sign off has taken place, a depersonalised version of this EHRIA should be published on the Councils' website.

Section 4 A: Sign Off and Scrutiny

Confirm, as appropriate, which elements of the EHRIA have been completed and are required for sign off and scrutiny.

Equality and Human Rights Assessment Screening

Equality and Human Rights Assessment Report

1st Authorised Signature (EHRIA Lead Officer): *Richard Bennett* Date:

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2nd Authorised Signature (Project Sponsor): *Eileen Mallon*

Date: