

# Equality Impact Assessment – Ref Number: 2257

## PART A Introductory Information

**Proposal name** Recommended Responses to Representations on the Publication Draft Sheffield Plan

### **Brief aim(s) of the proposal and the outcome(s) you want to achieve**

The report and associated appendices recommend the Council's response to the representations received as a result of public consultation on the Publication Draft Sheffield Plan that took place from 9<sup>th</sup> January to 20<sup>th</sup> February 2023. The main body of the Committee report highlights the key issues that were raised during the consultation and outlines the recommended Council response. The Council's full response is set out in Appendix 1 – the Consultation Statement (which must be submitted to the Government with the Publication Draft Plan).

Appendix 2 recommends a schedule of suggested amendments to the Plan that are derived from the recommended responses set out in the Consultation Statement. Officers consider that these amendments are needed to make the Publication Draft Plan 'sound'. If approved by full Council, they would be submitted to the Government alongside the Draft Plan. The amendments will then be considered by an independent Planning Inspector as part of the public examination (following submission of the Plan to Government).

Appendix 3 of the report lists recommended other minor amendments to the Plan to correct errors (mainly typos) or update factual information that has altered since the Plan was approved by full Council in December 2022. These do not need to be considered by the Planning Inspector.

For ease of reference, the proposed amendments are set out in a tracked change version of the Publication Draft Sheffield Plan at Appendix 4 (showing all the suggested changes that are listed in Appendices 2 and 3).

Appendix 5 provides a list of the 'submission documents' and, when relevant, includes updated positions on these documents. Updates will generally have resulted in response to comments received as part of the public consultation, and/or owing to the iterative nature of these documents. An updated Infrastructure Delivery Plan is shown at Appendix 6.

The report also sets out the timetable and process for submitting the Sheffield Plan to the Government for public examination.

A demographic breakdown of respondents is included in Appendix 6.

This EIA updates the previous EIA undertaken when the Publication Draft Sheffield Plan was approved for public consultation in December 2022.

### **Proposal type**

Budget       Non Budget

### **If Budget, is it Entered on Q Tier?**

Yes       No

If yes what is the Q Tier reference

### Year of proposal (s)

<input type="radio"/> 21/22	<input type="radio"/> 22/23	<input checked="" type="radio"/> 23/24	<input type="radio"/> 24/25	<input type="radio"/> other
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### Decision Type

- Coop Exec
- Committee (e.g., Health Committee) which committee
- Leader
- Individual Coop Exec Member
- Executive Director/Director
- Officer Decisions (Non-Key)
- Council (e.g., Budget and Housing Revenue Account)
- Regulatory Committees (e.g. Licensing Committee)

### Lead Committee Member

Cllr Tom Hunt

### Lead Director for Proposal

Kate Martin

### Person filling in this EIA form

Simon Vincent

### EIA start date

17 July 2023 (update to EIA 3 Nov 2022)

### Equality Lead Officer

- |  |  |
|--|--|
| <input type="radio"/> Adele Robinson     | <input type="radio"/> Ed Sexton              |
| <input type="radio"/> Annemarie Johnston | <input checked="" type="radio"/> Louise Nunn |
| <input type="radio"/> Bashir Khan        | <input type="radio"/> Beverley Law           |

### Lead Equality Objective ([see for detail](#))

<input type="radio"/> Understanding Communities	<input type="radio"/> Workforce Diversity	<input type="radio"/> Leading the city in celebrating & promoting inclusion	<input checked="" type="radio"/> Break the cycle and improve life chances
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## Portfolio, Service and Team

### Is this Cross-Portfolio

- Yes       No

### Portfolio/s

City Futures

### Is the EIA joint with another organisation (e.g. NHS)?

- Yes       No      Please specify

## Consultation

### Is consultation required? (Read the guidance in relation to this area)

- Yes       No

### If consultation is not required, please state why

### If consultation has already been carried out, please provide details of the results with equalities analysis

Consultation on the Publication Draft Sheffield Plan took place between 9<sup>th</sup> January and 20<sup>th</sup> February 2023. This followed consultation previously undertaken on 'Issues and Options' between November 2015 and January 2016 and September to October 2020. The main purpose of the Issues and Options document was to seek views on what matters should be addressed in Sheffield's new local plan (what we are calling 'The Sheffield Plan'). The Issues and Option document was **not** a draft local plan but was an early step towards producing a plan. The document highlighted some of the main challenges and opportunities relating to future development and planning of the city, proposed an overall vision and aims, and set out 3 broad spatial options for meeting Sheffield's future development needs.

An EIA was carried out for the Issues and Options document and in relation to a report to the Co-operative Executive on the spatial options in February 2022.

The previous EIAs noted that the Local Plan is primarily concerned with the development and use of land but will have significant benefits in terms of advancing equality of opportunity. It will support economic growth and job creation, with a specific objective to increase the number of higher paid jobs and raise average incomes. It will help increase the supply of new homes, including affordable homes, homes for disabled people, homes for older people and sites for Travellers. The plan will help to deliver and support essential infrastructure - providing land for schools, health facilities, open space and other local services. It will also have positive impacts in terms of transport and travel – supporting enhancement of, and access to, public transport and promoting active travel (with associated health benefits). Better design and place-making can provide opportunities for communities to meet and interact, fostering better relations.

The purpose of the recent consultation on the Draft Plan was to assess whether it is 'sound'. The soundness tests are set out in national planning policy – a local plan has to be positively prepared, justified, effective and be consistent with national planning.

The Publication Draft Sheffield Plan was the subject of public consultation in accordance with national planning Regulations and the Statement of Community Involvement (July 2020).

### Are Staff who may be affected by these proposals aware of them?

- Yes       No

### Are Customers who may be affected by these proposals aware of them?

- Yes       No

### If you have said no to either please say why

## Initial Impact

Under the [Public Sector Equality Duty](#) we have to pay due regard to the need to:

- eliminate discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations

For a range of people who share protected characteristics, more information is available on the [Council website](#) including the [Community Knowledge Profiles](#).

## Identify Impacts

Identify which characteristic the proposal has an impact on tick all that apply

<input checked="" type="radio"/> Health	<input type="radio"/> Transgender
<input checked="" type="radio"/> Age	<input checked="" type="radio"/> Carers
<input checked="" type="radio"/> Disability	<input checked="" type="radio"/> Voluntary/Community & Faith Sectors
<input checked="" type="radio"/> Pregnancy/Maternity	<input checked="" type="radio"/> Cohesion
<input checked="" type="radio"/> Race	<input checked="" type="radio"/> Partners
<input type="radio"/> Religion/Belief	<input checked="" type="radio"/> Poverty & Financial Inclusion
<input type="radio"/> Sex	<input type="radio"/> Armed Forces
<input type="radio"/> Sexual Orientation	<input type="radio"/> Other

## Cumulative Impact

Does the Proposal have a cumulative impact?

- Yes  No

<input checked="" type="radio"/> Year on Year	<input checked="" type="radio"/> Across a Community of Identity/Interest
<input checked="" type="radio"/> Geographical Area	<input type="radio"/> Other

*If yes, details of impact*

The Sheffield Plan sets out how the city will grow and develop over the period 2022-2039. It includes an annual requirement for both housing delivery and the development of employment land. New development will therefore accumulate year on year.

The Plan covers the whole city but certain areas are more affected by new development than others. The Central Sub-Area (covering the City Centre) is expected to accommodate over half of all new housing that is planned (over 18,600 homes by 2039). The other 6 Subs- Areas see lower levels of development, with relatively little change in Chapeltown/High Green.

Local Area Committee Area(s) impacted

- All  Specific

*If Specific, name of Local Committee Area(s) impacted*

## Initial Impact Overview

### Based on the information about the proposal what will be the overall equality impact?

The Draft Sheffield Plan will have an overall positive impact, will support the duty to enhance equality of opportunity and will not result in discrimination of any equality impact group. There could be some negative impacts as a result of aiming to achieve the housing growth and economic growth required by the city, whilst trying to enable choice and opportunity. Achieving the level of growth set out in the Draft Sheffield Plan potentially has massive equality benefits for a large number of people through the provision of more, better quality homes and the provision of new jobs.

The Cooperative Executive made a decision on the overall spatial strategy in February 2022. At that point it was emphasised that there are some potentially negative equality impacts of pursuing a growth strategy that does not allow any release of greenfield sites in the Green Belt. Limiting development to the existing urban areas (with no outward expansion of the built-up areas) means that levels of growth are restricted in some areas. In particular, this is likely to reduce the overall number of affordable homes that can be delivered (because it is generally more viable to provide affordable housing on greenfield sites). However, the decision by the Cooperative Executive reflects the priority that has been given to the Climate and Biodiversity Emergencies – promoting more sustainable travel and protecting ecologically valuable areas. That said, development will take place in many locations across the whole city.

The decision to focus so much new growth in the Central Sub-Area is likely to disproportionately impact BAME communities who are more concentrated there. Whilst new development is potentially beneficial (in terms of access to new homes and jobs, etc), it needs to be supported by sufficient community services and facilities.

Attention is drawn to the following policies which are expected to have positive impacts:

- Policies SP1 and SP2 – promote new employment opportunities to meet future needs of the working age population
- Policy NC3 - requires provision of affordable housing on larger housing sites where economically viable
- Policy NC4 – 100% of new homes to be accessible and adaptable and, in larger developments (50 or more new homes), 2% to be wheelchair adaptable or accessible dwellings
- Policy NC4 - specialist housing designated for older or disabled people is promoted in areas of need; all such homes must be fully wheelchair accessible
- Policies H1 and NC7 – provision of accommodation for Gypsies & Travellers (including Travelling Showpeople)
- Policy NC11 - acceptable walking distances to local services and facilities varied to take account of the mobility of the intended residents
- Policy NC12 – controls over new hot-food takeaways close to secondary schools
- Policy NC15 – new open space including provision for children on new housing developments
- Policy EC7 - encourages the provision of jobs for local people
- Policy CO2 Parking Guidelines – accessible parking required for disabled people
- Policy DE3 – entrances to buildings to be accessible, avoiding the need for separate arrangements
- Policy DE4 – spaces around and between buildings to be inclusive and dementia friendly
- Policy DE5 - roads, pedestrian routes and areas, cycleways, and public spaces to adhere to the principles of inclusive design

The forecast future demographic changes will create some significant challenges for the city. In particular, the number of older people is expected to rise by 20% by 2035 meaning there will

be major demands on health facilities, social care and housing. In the Sheffield Plan, we seek to address these problems where it is possible to do so through new development.

Is a Full impact Assessment required at this stage? ● Yes ○ No

If the impact is more than minor, in that it will impact on a particular protected characteristic you must complete a full impact assessment below.

## Part B

### Full Impact Assessment

#### Health

Does the Proposal have a significant impact on health and well-being (including effects on the wider determinants of health)?

● Yes ○ No *if Yes, complete section below*

#### Staff

○ Yes

● No

#### Customers

● Yes

○ No

#### Details of impact

There are four main aspects to how the spatial approach may impact on health:

- whether new development will take place in areas with poor air quality and whether it could increase vehicular emissions of harmful gases;
- related to (a) whether the location of development would enable and encourage more active travel (walking and cycling) but also reduce vehicular emissions
- whether new homes would be built where there is good access to open space and where there are opportunities for recreation – affecting both mental and physical health
- whether it can help to reduce child obesity by limiting the number of hot-food takeaways

The spatial strategy seeks to maximise the use of brownfield sites within the existing urban areas, especially within the Central Area of Sheffield (where 18,600 new homes are proposed, as well as significant office, retail and leisure development).

The strategy largely avoids development on sites in the Green Belt on the edge of the existing built-up areas where development is likely to be more car dependent and travel distances to jobs and services are likely to be greater. However, this will vary from location to location. People living in the Central Area and eastern side of the city are more likely to experience poorer air quality overall but the Central Area also offers greater opportunities to make trips on foot or by cycle. The Clean Air Zone and various transport initiatives are seeking to tackle air quality problems and provide more attractive alternatives to diesel and petrol vehicles. Over the period covered by the Local Plan, the switch to electrical vehicles should lead to marked improvements in air quality.

A number of the development management policies include criteria that support active travel or use of public transport:

- Policy NC1: Principles Guiding the Development of Strategic Housing Sites – promotes the creation of ‘walkable neighbourhoods’;
- Policy NC7: Criteria for Assessing New Gypsy and Traveller and Travelling Showpeople Sites – sites required to be within easy walking distance of a bus or tram stop on a route providing the minimum service frequency standard;
- Policy NC9: Housing Density – promotes higher densities (and therefore more people) in the most accessible locations;
- Policy NC10: Development in District and Local Centres – identified as the focus for the creation of ‘20-minute neighbourhoods where most of peoples’ daily needs can be met within a 10-minute walk or cycle ride;
- Policy NC11: Access to Key Local Services and Community Facilities in New Residential Developments – accessibility standards set out for access to public transport and local services and facilities for development of 10 or more new homes;
- Policy CO1: Development and Trip Generation - includes provisions and incentives to increase sustainable and active travel and reduce reliance on the car
- Policy CO2: Parking Provision in New Development – residential development in the Central Sub-Area should be car-free or provide 1 space per dwelling where a need can be demonstrated. Also covers provision for cycle parking and facilities for zero emission vehicles.

Access to recreational open space will also vary according to location. People living in the Central Area will generally have poorer access to open space than those living in suburban areas or on the edge of the built-up area. However, new open space or public spaces are planned in several of the Priority Locations for development in the Central Area.

The availability of open space in different locations has been assessed as part of the detailed site selection process. On-site open space is usually required in new housing developments of 100 or more new homes, except where it is not practical to do so (though in such cases a contribution to off-site provision will be required).

The plan includes a specific policy (NC12) that seeks to limit the number of hot-food takeaways close to secondary schools. This is part of the Council’s Food Strategy which seeks to reduce levels of obesity and associated ill health, enabling children and the wider community to make healthier food choices.

**Comprehensive Health Impact Assessment being completed**

Yes      No

*Please attach health impact assessment as a supporting document below.*

**Public Health Leads has signed off the health impact(s) of this EIA**

Yes    No

**Name of Health Lead Officer**

## Age

### Impact on Staff

Yes  No

### Impact on Customers

Yes  No

### Details of impact

The decision on where and how much previously undeveloped/Green Belt land to release for development is likely to impact on the type and affordability of housing that is provided. It is likely to be more economically viable to provide affordable homes on greenfield sites in areas where land values are higher. So, providing more greenfield land for development is likely to benefit younger people (and other households) on lower incomes.

The decision on whether to release greenfield land for development has been balanced with the need to promote more sustainable patterns of development (in response to the Climate and Biodiversity Emergencies).

The preferred spatial option (Option 3) will potentially enable some previously undeveloped land in the urban areas to be developed, including for affordable and specialist housing. These sites are likely to be more economically viable than many brownfield sites. Options 4 and 5 would, however, have enabled more sites to be provided for specialist housing in areas where suitable sites could otherwise be lacking.

Policy NC4 Housing for Independent and Supported Living – promotes the provision of specialist housing for older or disabled people in areas of need. We have proposed an amendment to this policy which states that proposals will be acceptable where the accommodation would be close to local facilities, particularly public transport, shops, and health services.

The Draft Plan includes a number of references to development being dementia-friendly:

- Policy NC1 Principles Guiding the Development of Strategic Housing Sites – development to be designed to be a ‘lifetime neighbourhood’ and dementia-friendly’
- Policy NC15 – requires new open space to be publicly accessible, safe and follow the principles of inclusive and dementia friendly design
- Policy DE3 Public Realm and Landscape Design – states that landscaping proposals should be inclusive, dementia friendly, improve vitality and safety, and encourage active and healthy lifestyles
- Policy DE4 Design of Streets, Roads and Parking – states that they should adhere to the principles of inclusive and dementia friendly design



## Disability

### Impact on Staff

Yes       No

### Impact on Customers

Yes       No

#### Details of impact

The location of new development will affect the ease with which disabled people are able to travel to local services and facilities. However, this will vary from location to location depending on the distances involved and access to public transport. These matters have been considered fully through the detailed site selection process.

A large proportion of the housing that is proposed in the Central Area is likely to be apartments and much of that is likely to have limited or no off-street parking. This would potentially disadvantage disabled people who require a car for their mobility. This could, however, be mitigated by ensuring that new developments comply with the Parking Guidelines ensuring that appropriate parking provision is provided for disabled people. We have proposed an amendment to the Parking Guidelines in Annex B in relation to car free housing development which makes it clear that provision will be required for disabled parking in the Central Area.

Many disabled people also have lower incomes so providing more greenfield land for development would potentially have benefited disabled people (see comments in relation to Age above). The spatial approach of allowing some previously undeveloped land in the urban areas to be developed potentially increases the supply of affordable housing but the impact is quite limited.

Under the Draft Plan (Policy NC4) all new homes will be required to be 'accessible and adaptable' (complying with Building Regulations M4(2)). 2% of homes on developments of 50 or more new homes will be required to be wheelchair adaptable or accessible. There is some concern that this figure is too low and schemes of 49 homes or less would not be required to provide wheelchair adaptable or accessible homes. However, setting the requirement any higher would reduce the number of affordable homes that can be delivered. Affordable housing can be more readily targeted at those people who require wheelchair accessible housing (whereas there is no guarantee that wheelchair adaptable homes provided in market housing schemes will be purchased by someone who needs such housing. Nationally, 1.9% of households include someone who uses a wheelchair.

The proposed amendment to Policy NC4 (referred to under 'Age' above) should improve development outcomes for older people.

## Sex

### Impact on Staff

Yes  No

### Impact on Customers

Yes  No

### Details of impact

## Pregnancy/Maternity

### Impact on Staff

Yes  No

### Impact on Customers

Yes  No

### Details of impact

## Race

### Impact on Staff

Yes  No

### Impact on Customers

Yes  No

### Details of impact

The Draft Sheffield Plan seeks to maximise the use of brownfield sites within the existing urban areas, especially within the Central Area of Sheffield (where over 18,600 new homes are proposed and significant office, retail and leisure development). Many of the brownfield sites are concentrated in areas in east Sheffield where there are significant BAME communities and therefore new development should benefit these communities through employment and housing opportunities. Also see Health and Poverty & Inclusion sections.

The largest number of objections to the Publication Draft Sheffield Plan were in relation to the proposed employment and gypsy and traveller site at Eckington Way (Site Allocation SES03). Our conclusion is that there are no valid planning reasons for not allocating this site; the Council has a statutory responsibility to provide for Gypsies and Travellers that travel for work. Gypsies and Travellers have the same right to have their housing needs met as anyone else. The site is close to local services, shops and facilities, so is a sustainable location to live. A failure to allocate sufficient sites for Gypsies and Travellers would have a serious negative impact on that community.

## Religion/Belief

### Impact on Staff

Yes  No

### Impact on Customers

Yes  No

### Details of impact

## Sexual Orientation

### Impact on Staff

Yes  No

### Impact on Customers

Yes  No

### Details of impact

## Gender Reassignment (Transgender)

### Impact on Staff

Yes  No

### Impact on Customers

Yes  No

### Details of impact

## Carers

### Impact on Staff

Yes  No

### Impact on Customers

Yes  No

### Details of impact

The location of development will affect the ease with which staff providing care can reach their customers by different modes of transport. Access to sites by different modes has been assessed as part of the site selection process.

Concentrating future development in the existing urban areas and maintaining a compact city means that development is more likely to be well-served by public transport (although this will vary depending on the location). However, the Sheffield Plan has no direct control over the provision of public transport services.

## Poverty & Financial Inclusion

### Impact on Staff

Yes

No

### Impact on Customers

Yes

No

### Details of impact

The Sheffield Plan aims to create around 2,550 new jobs per year over the period 2022-2039, although whether this is achieved will depend to a considerable extent on wider economic conditions. The plan provides land for both office and general industrial uses. Particular emphasis is placed on delivering developments in the Innovation District that will deliver better paid jobs.

Policy EC7 'Promoting Local Employment in Development' recognises that new development often takes place in areas of high deprivation and there is a danger that the benefits of development are not fairly shared with these local residents. The Policy therefore expects local sustainable employment to be secured by major employment-generating developments providing employment and training opportunities, to be taken up by local people during both the construction phase and, when practical, the occupation phase.

The Draft Plan is therefore beneficial in terms of providing employment opportunities.

## Cohesion

### Impact on Staff

Yes

No

### Impact on Customers

Yes

No

### Details of impact

## Partners

### Impact on Staff

Yes

No

### Impact on Customers

Yes

No

### Details of impact

The Draft Plan provides a framework for determining planning applications in all areas of the city and for all types of development. In that sense the Plan will impact on the development proposals from a range of different partners (in particular, the universities, Registered Providers (or affordable housing) and a wide range of community organisations).

The Plan includes a policy which seeks to safeguard assets of community value.

## Armed Forces

### Impact on Staff

Yes

No

### Impact on Customers

Yes

No

### Details of impact

## Other

*Please specify*

### Impact on Staff

Yes

No

### Impact on Customers

Yes

No

### Details of impact

## Action Plan and Supporting Evidence

### What actions will you take to mitigate any equality impacts identified? Please include an Action Plan with timescales

As part of the consultation exercise, emails or letters were sent to all the organisations, businesses and individuals who are registered on the Sheffield Plan database, alerting them to the start of the consultation. The consultation was also publicised through social media and through Local Area Committee (LAC) mailings. A range of meetings and drop-in sessions were held during the consultation period, including presentations and/or staffed exhibitions with all 7 LACs.

Consultation events were held with the following organisations representing people with protected characteristics:

- The Access Liaison Group
- Sheffield and District African Caribbean Community Association (SADACCA)
- Celebrating Diversity Drop-in event
- Women's Wellbeing Café Q&A
- Age Uk

A number of the amendments outlined in the sections above address concerns made in representations from the Access Liaison Group. However, changes to the Plan have not been made where the change proposed was not necessary to make the Plan sound or where it would result in the Plan being overly detailed. In many cases these issues will be addressed in future supplementary planning documents or other strategies.

As part of the consultation, individuals who made comments through the Local Plan consultation portal were asked to provide details of their age, sex, ethnicity, disability, gender, sexual orientation and religion/belief. Respondents were also asked if they were a carer. A demographic breakdown of respondents is included in Appendix 7 of the report to the Strategy & Resources Policy Committee. Of those who responded to the questions:

- Only 3% were aged 24 or under;
- 62% of respondents were aged 55 or over;
- There were roughly equal numbers of male and female respondents;
- 1 was from a person whose gender identity is different to their sex registered at birth;
- 2 (1%) did not identify as male or female;
- 10% were from people who were gay/bisexual/lesbian/gay woman/another;
- 13.5% considered themselves to be disabled;
- 13.5% were carers;
- 60% had no religious belief;
- 36% were Christian (all denominations);
- 4% were from ethnic minorities.

Overall, therefore, the number of people from ethnic minorities who responded was disappointing. Older people, disabled people and women were generally well represented in terms of people who responded to the question.

A Integrated Impact Assessment (December 2022) was produced in support of the Publication Draft Sheffield Plan and has informed the assessment above.

**Detail any changes made as a result of the EIA**

[Redacted area]

Following mitigation is there still significant risk of impact on a protected characteristic.  Yes  No

If yes, the EIA will need corporate escalation? Please explain below

[Redacted area]

**Sign Off – Part B (EIA Lead to complete)**

EIAs must be agreed and signed off by the Equality lead Officer in your Portfolio or corporately. Has this been signed off?

Yes  No

Date agreed

Name of EIA lead officer

**Review Date**

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