



**Wyre Forest District Council
Local Plan 2016-2036**

Examination

Matter 1: Legal requirements, duty to co-operate and the public sector equality duty

Wyre Forest District Council Response

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Wyre Forest District Council

Wyre Forest District Local Plan (2016-2036) Examination

Matter 1: Legal requirements, duty to co-operate and the public sector equality duty

Q1.1 Is the Wyre Forest District Local Plan 2016-2036 (the Plan) compliant with the Planning and Compulsory Purchase Act (2004) (as amended) and the 2012 Regulations (as amended)? Has it been prepared in accordance with the Local Development Scheme and the Statement of Community Involvement?

2004 Act (as amended) and 2012 Regulations (as amended)

- 1.1.1 During an Extraordinary Council meeting on 20th February 2020, Full Council approved the proposed Wyre Forest District Local Plan (2016-2036) and Policies Map (together with the associated evidence base, including the Sustainability Appraisal) for the purpose of its submission to the Secretary of State for independent examination under section 20 of the Planning and Compulsory Purchase Act 2004.
- 1.1.2 The Council is therefore satisfied that the Local Plan is compliant with the 2004 Act (as amended) and the 2012 Regulations (as amended), as also evidenced by the Local Plan Legal Compliance Checklist (SD19).

Local Development Scheme (LDS)

- 1.1.3 A Local Development Scheme (LDS) is required under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). The Local Plan is in general compliance with the Local Development Scheme (June 2019) (SD17) up to submission of the Plan. The latest LDS was adopted by the Council in June 2019. An LDS has been in place since the commencement of the Local Plan review and has been revised as necessary throughout the plan making process. The adopted LDS is published on the Council's website.

Statement of Community Involvement (SCI)

- 1.1.4 Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement. The Council's Statement of Community Involvement (SCI) was adopted in February 2013 and published on the Council's website. The Local Plan is compliant with the adopted SCI (February 2013). The adopted SCI (SD18) was submitted alongside the Submission version of the Local Plan.
- 1.1.5 The statutory consultations undertaken during the Local Plan review comply with the SCI. Evidence of this can be found in the Statement of

Consultation (SD06). The Statement of Consultation sets out how the Council has met the requirements of Regulation 22 of the Town and Country Planning (Local Plan) (England) Regulations 2012.

Q1.2 Is the sustainability appraisal adequate? Does it indicate that the Plan sets out an appropriate strategy for the District over the Plan period, taking account of the reasonable alternatives?

- 1.2.1 The Council's view is that the Sustainability Appraisal (SA) is adequate. At each major stage of its preparation, the Local Plan has been based on a sound process of Sustainability Appraisal. SA is a systematic process that aims to promote sustainable development by identifying the emerging Local Plan's likely significant economic, environmental and social effects, and suggesting measures to minimise any negative effects and maximise the positive ones. SA helps to produce a more integrated Local Plan which has gone through an inclusive, transparent process. Wyre Forest District's SA also incorporates strategic environmental assessment (SEA).
- 1.2.2 The first stage of the Local Plan's sustainability appraisal process was the Local Plan Review Sustainability Appraisal Scoping Report May 2015 (LPP01). In September 2015 the Local Plan Review Sustainability Appraisal Revised Scoping Report September 2015 (LPP02) was consulted on alongside the Issues and Options Local Plan consultation (LPP04). In 2017 the Local Plan Review Preferred Options Sustainability Appraisal (LPP06) was produced alongside the Preferred Options (LPP11) stage of the Local Plan. Wyre Forest District Council appointed Levett-Therivel sustainability consultants to undertake the SA of the Pre-Submission publication draft local plan (SD04, SD04a, SD04b).
- 1.2.3 The Environmental Assessment of Plans and Programmes Regulations 2004 ¹('SEA regulations') set out the requirements of a SA. Table 1.2.3 sets these out and shows how Wyre Forest District's SA process meets the requirements.

¹ [The Environmental Assessment of Plans and Programmes Regulations 2004](#)

Table 1.2.3 Key requirements of an adequate SA and evidence that Wyre Forest District has met these.

Key Requirements of the Environmental Assessment of Plans and Programmes Regulations (2004)²	What would an adequate SA look like?	How the Wyre Forest District SA has been developed to ensure that it meets these requirements
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	A simple summary of the vision, objectives and contents of the plan to set the assessment in context.	2019 SA (SD04) Chapter 1 provides a simple summary of the vision and spatial objectives of the Local Plan and its contents. Appendix A of the 2015 scoping report (LPP01) reviews relevant plans and programmes, and the 2019 SA at Section 3.2 updates this.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	A review of those aspects of the environment that the plan is likely to significantly influence. A review of how those aspects are likely to change in the future if the plan does not go ahead. This is to provide a realistic baseline against which to compare the effects of the plan.	Appendix B of the 2015 scoping report describes the sustainability baseline. Section 3.3 of 2019 SA updates this, including likely evolution without the plan. Additional studies carried out to support the development of the plan since 2015 include several studies of objectively assessed housing need, a residential land availability report, an employment land review, several Green Belt reviews, an infrastructure delivery plan, a water cycle study, a strategic flood risk assessment, and an ecological appraisal of sites.
3. The environmental characteristics of areas likely to be significantly affected.	A review of those aspects of the environment that the plan is likely to significantly influence.	SA Appendix B Site Appraisals 2019 (SD04a) and the HELAA reports for individual sites (HOU04a/b/c/d) include environmental characteristics of sites.
4. Any existing environmental problems which are relevant to the plan or programme including, in particular,	A review of existing problems in the district. This is to help inform the	2019 SA Section 3.4 lists the environmental issues/ problems for the District, including information on relevant Special

² The environmental (SA) report must include the information that may reasonably be required, taking account of (a) current knowledge and methods of assessment; (b) the contents and level of detail in the plan or programme; (c) the stage of the plan or programme in the decision-making process; and (d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment) (Reg. 12.1 of the SEA regulations).

Key Requirements of the Environmental Assessment of Plans and Programmes Regulations (2004)²	What would an adequate SA look like?	How the Wyre Forest District SA has been developed to ensure that it meets these requirements
those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.	development of the plan, to help to reduce existing problems.	Protection Areas for birds and Special Areas of Conservation for habitats and species.
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	A review of those policies, plans and programmes and environmental protection objectives that are directly relevant to both the Local Plan and the SA.	App. A of the 2015 scoping report included a detailed analysis of the plans, policies and programmes that were reviewed as part of this SA to 2015. 2019 SA report Section 3.2 updates this.
6. The likely significant effects on the environment on issues including— (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in subparagraphs (a) to (l).	A clear assessment of the effects of the plan with regard to the effect types identified and the issues identified.	Chapters 4-8 of the 2019 SA report appraised the sustainability impacts of the Local Plan: <ul style="list-style-type: none"> • Chapter 4 (plan objectives) • Chapter 5 (alternatives) • Chapter 6 (sites) • Chapter 7 (plan policies) • Chapter 8 (overall plan) Appendix A of the 2019 SA report shows the detailed appraisals of the plan policies, and the HELAA assessments (Appendix B) show the detailed appraisal of the sites. The assessment covers all of the impacts listed in the regulations. Table 3.7 of the 2019 SA shows the framework used to assess the plan objectives, alternatives, policies and overall plan. The SA framework objectives that cover the impacts listed in the regulations are: (a) biodiversity / (d) fauna / (e) flora: 9. To conserve & enhance

Key Requirements of the Environmental Assessment of Plans and Programmes Regulations (2004) ²	What would an adequate SA look like?	How the Wyre Forest District SA has been developed to ensure that it meets these requirements
		<p>the District's biodiversity and geodiversity</p> <p>(b) population / (c) human health: 1. To improve health and well-being within the District and reduce inequalities in health. 3. To ensure that the housing needs of all residents and communities are met.</p> <p>(f) soil: 6. To protect soil & land</p> <p>(g) water: 7. To protect water resources and quality; reduce flood risk</p> <p>(h) air / (i) climatic factors: 5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions, 4. To promote energy efficiency & energy generated from renewable and low carbon sources.</p> <p>(j) material assets: 10. To support the economy & ensure suitable employment opportunities, 12. To maintain the integrity of the Green Belt within the District</p> <p>(k) cultural heritage, including architectural and archaeological heritage: 11. To protect & enhance the historic environment & its settings</p> <p>(l) landscape: 8. To protect and enhance landscape and townscape.</p> <p>Section 3.5 of the 2019 SA explains how these objectives were adapted for appraisal of the development sites. The site appraisal framework is at Table 3.9 of the 2019 SA.</p>
<p>The effects should include short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary,</p>		<p>Section 6.3 of the 2019 SA discusses the overall impacts of the plan, including secondary/indirect effects, cumulative and synergistic effects, short, medium- and</p>

Key Requirements of the Environmental Assessment of Plans and Programmes Regulations (2004)²	What would an adequate SA look like?	How the Wyre Forest District SA has been developed to ensure that it meets these requirements
cumulative and synergistic effects.		long-term effects, temporary and permanent effects, and positive and negative effects.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Measures to mitigate the significant adverse effects (and uncertain effects which must be treated as potentially significant) identified and clearly reported.	Chapter 7 of the 2019 SA report describes mitigation measures inherent in (or integrated into) the plan, and changes to the plan resulting from the SA process.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Identification, assessment and comparison of reasonable alternatives; and information about the reasons for the choice of preferred alternatives. Information on problems faced in carrying out the SA process.	Chapter 5 of the 2019 SA report describes the alternatives considered, assesses and compares them, and explains the choice of preferred alternatives. Additional information is at paragraph 1.2.7 below. Section 2.5 of the 2019 SA report explains difficulties faced in carrying out the assessment.
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	A programme of monitoring setting out how significant and uncertain effects are to be monitored.	Chapter 8 of the 2019 SA puts forward a monitoring framework for the plan. The final SA monitoring programme will be included in the SA adoption statement (once the Local Plan is adopted) and this will reflect any changes made at the Public Examination and prior to adoption.
10. A non-technical summary of the information provided under paragraphs 1 to 9.	Preparation of a summary in non-technical language	A separate non-technical summary has also been produced for the 2019 SA (SD04b). A non-technical summary also formed part of the Preferred Options SA 2017 and both Pre-Submission SA's.

1.2.4 The SEA Regulations require that an SA report “shall identify, describe and evaluate the likely significant effects on the environment of – (a)

implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” (SEA Regulations 12(1)). It must also provide “An outline of the reasons for selecting the alternatives dealt with”. (SEA Regulations Schedule 2 (8)). The Council has fulfilled its obligations to identify strategy/policy alternatives through the following documents:

- 1.2.5 The Issues and Options Stage of September 2015 (LPP04) set out strategic and site options. Seven alternatives/options for accommodating growth within Wyre Forest District were considered, all of which prioritise brownfield development but reflect different ways of providing the necessary additional greenfield development; all were subject to SA assessment.
- 1.2.6 At the Preferred Options stage of May 2017 (LPP11), the six preferred options that were taken forward from the Issues and Options stage were combined into two more specific options (A and B) for location of growth in the district. At this point the other reasonable alternatives were discounted.
- 1.2.7 Following the Preferred Options consultation, a combination of Option A and Option B were considered to be the best approach for the spatial strategy to accommodate the housing and economic growth requirements in the district, with infrastructure, especially schools and highways, this being critical to the final strategy.
- 1.2.8 All options were assessed for likely significant effects against the 13 SA objectives and given a score from the categories of significance which could range from a major negative through to a major positive, also taking account of uncertain and neutral effects.
- 1.2.9 Sections 5.2 – 5.5 of the 2019 SA (SD04) discuss the high-level spatial strategy alternatives considered during the development of the Local Plan, how alternatives to the plan have been identified, assessed and compared, and why the preferred option has been chosen. In terms of choosing the preferred sites, a site selection paper has brought together the key findings from evidence-based studies and considered whether sites should be considered for allocation in the emerging Local Plan. The HELAA/SA forms for each site were brought together at Table 5.2 of the 2019 SA (SD04), and Section 5.6 of the 2019 SA provides further information about the choice of preferred sites.
- 1.2.10 To ensure that the SA has considered as up to date information as possible, a Sustainability Appraisal consideration of alternatives update was prepared in June 2020 (ED5), which takes into account Brexit and Covid-19.

Q1.3 Does the Plan as a whole accord with s19(1A) of the Act by including policies that are designed to secure that the development and use of the land in the District contribute to the mitigation of, and adaptation to, climate change?

- 1.3.1 S19 (1A) of the 2004 Act requires that 'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change'.¹
- 1.3.2 Mitigation is putting in place measures to reduce the severity of climate change impacts, whilst adaptation seeks to ensure that necessary measures are in place to deal with those impacts when and if they happen.
- 1.3.3 Climate change is the long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Climate change is often regarded as a result of greenhouse gases generated by human activity, notably fossil fuel consumption. It has resulted in summer temperature rises and increased winter rainfall. In Wyre Forest District this is likely to cause incidences of fluvial or surface water flooding due to intense or sustained rainfall events, risks to health & well-being through higher summer temperatures and potential changes in species and habitat composition. There are two Air Quality Management Areas within the District, mostly due to NO_x emissions from vehicles.
- 1.3.4 Chapter 2 Key Issues and Challenges (SD01) highlight Social, Economic and Environmental issues facing the District. Environmental Issues recognises:
- The need to plan for the impact of climate change which includes flooding in new development.
 - Pressure for development in flood zones.
 - Poor air quality.
- 1.3.5 The Local Plan includes the following policies and reasoned justifications in relation to the mitigation of and adaptation to climate change:
- 1.3.6 The reasoned justification for Policy 5A Overarching Sustainable Development Principles states that the plan has several roles:
- "...c. An environmental role – contributing to protecting and enhancing Wyre Forest's unique natural, built and historic environment by... viii. Mitigating and adapting to climate change and flood risk, including moving to a low carbon economy and reducing flood risk and wastewater through water management."

- 1.3.7 The reasoned justification states that the Local Plan will seek to guide development to achieve sustainable solutions and the policies, taken as a whole, constitute the authority's view of what sustainable development means in practice for Wyre Forest when promoted through the planning system.
- 1.3.8 Chapter 6 A Sustainable Future – Development Strategy sets out the broad framework for future development within the District focussing most development in and adjacent to the urban areas in sustainable locations. A revised settlement hierarchy paper (SH01) provides a clear steer on the future role of the District's settlements and aims to focus new development in locations which will promote sustainable communities. The settlement hierarchy is based on an assessment of the services and facilities that are available in each settlement and their potential to support housing growth in a sustainable manner. A scoring system was devised based on the availability of each of the services such as public transport and access to a railway station as well as facilities within each settlement to reduce the need to travel. This scoring meant that the proposed allocation of large-scale development sites are in sustainable locations and should examine the potential for a decentralised energy and heating network.
- 1.3.9 Chapter 11 A Unique Place highlights that access to high-quality well-maintained public space is an essential part of promoting active, healthy lifestyles. Well-designed streets can encourage walking and cycling and good access to public space can facilitate participation in sport and active recreation. A comprehensive network of green spaces and corridors will support a range of biodiversity and will help to tackle climate change. Policies within this chapter protect and enhance biodiversity and geodiversity.
- 1.3.10 Chapter 13 Transport and Accessibility helps to address climate change by encouraging active walking and cycling to reduce the reliance on private vehicles.
- 1.3.11 Chapter 14 Strategic Green Infrastructure recognises that green infrastructure contributes to the mitigation of climate change. The chapter begins by stating that:
- “The enhancement of the District's Green Infrastructure Network will form a key part of the development strategy for the District. This policy places an emphasis on the delivery of a comprehensive network of green spaces and corridors across the District. This will help to promote active lifestyles, support biodiversity, address climate change and safeguard and enhance the District's unique landscape character”.
- 1.3.12 Chapter 15 Water Management starts with the statement that the purpose of water management policies includes the mitigation of flood

risk and surface water drainage, including Sustainable Drainage Systems (SuDS).

1.3.13 Policy 15C - Flood Risk Management states that:

“In line with the NPPF and NPPG the Council will steer new development to areas with the lowest probability of flooding. In order to minimise the impacts of and from all forms of flooding, the Council requires all development in areas thought to be at risk of flooding to:

- i) Ensure development proposals are located in accordance with the Sequential and Exception Test where appropriate and also take account of the latest versions of the Strategic Flood Risk Assessment, the Worcestershire Local Flood Risk Management Strategy, and the Worcestershire Surface Water Management Plan”.

1.3.14 Paragraph 15.16 also states that:

“The Local Plan plays an important role by requiring new developments to provide integrated flood mitigation methods and by working to retain surface water runoff on-site through sustainable drainage, integrating flood mitigation measures and providing appropriate buffering between watercourses and development. Development needs to be resilient to flood risk and the effects of climate change for its lifetime by setting appropriate floor levels, providing safe pedestrian and vehicle access and where appropriate provide a flood evacuation management plan, exceedance route plan and a SuDS maintenance plan”

1.3.15 Policy 15D states that the design of SuDS should make allowance for climate change in line with the latest Government Climate Change Allowances guidance.

1.3.16 Policy 15C Flood Risk Management and the reasoned justification in paragraph 15.16 recognises that new development for its lifetime needs to be resilient to the effects of climate change and flood risk and therefore it sets appropriate floor levels, safe pedestrian and vehicle access and where appropriate a flood evacuation management plan, exceedance route plan and a SuDS maintenance plan.

1.3.17 The reasoned justification to Policy 16 Waste recognises that minimising waste and pollution helps to reduce climate change:

“To minimise waste and pollution and reduce the impact of waste on Climate Change Wyre Forest District Council expects future developments to support the waste management hierarchy. The waste hierarchy gives top priority to preventing waste in the first place. Where waste is generated, priority is to reuse, then recycle, then other forms of

recovery such as energy recovery and last of all disposal (for example landfill)”).

1.3.18 Policy 24B Renewable and Low Carbon Energy focuses on renewable and low carbon energy and mitigating the effects of climate change. It states:

General

- All new developments, and where possible redevelopment of existing buildings, should consider location, design, siting and orientation to maximise the use of natural heat and light and the potential for renewable energy micro-generation. Where possible, in appropriate locations, solar panels should be fitted. All new developments should include electric vehicle charging points.

Incorporating Renewable and Low Carbon Energy into New Development

- To reduce carbon emissions and secure sustainable energy solutions, all new developments over 100 square metres gross, or one or more dwellings, should incorporate the energy from renewable or low carbon sources equivalent to at least 10% of predicted energy requirements, unless it has been demonstrated that this would make development unviable. Applications will be required to include an Energy Assessment demonstrating how these requirements will be met. Where renewables are not installed for reasons such as viability, consideration must be given to allow renewable technology at a later date.
- Large scale development proposals should examine the potential for a decentralised energy and heating network. If practical and viable, a decentralised energy and heating network should be provided as part of the development. If a district heat network already exists new development should connect to this network unless satisfactory evidence is provided to demonstrate that this is not viable or practicable.
- Renewable energy installations that harm the significance of heritage assets or have a detrimental impact on the landscape or historic environment, conflicting with any other policies contained in this Plan will not be supported unless the requirements of the NPPF are satisfied.

Stand Alone Renewable and Low Carbon Energy Schemes

- With the exception of wind turbines (see below), proposals for stand-alone renewable and other low carbon energy schemes are welcomed and will be considered favourably having regard to the provisions of other relevant policies in the Plan, providing that appropriate consultation has taken place with the local community and the appropriate Town or Parish Council. Where possible, community shares in renewable energy schemes which offer members of the community investment into local energy schemes should be considered.
- Proposals for stand-alone wind turbines will only be considered favourably if:
 - It is in an area considered suitable for wind energy development; and, following consultation, it can be demonstrated that the planning impacts identified by the affected community have been fully addressed.

1.3.19 The policy aim is to ensure that development and the use of land is designed to mitigate climate change.

1.3.20 Policy 27A Quality Design and Local distinctiveness and in the Reasoned Justification at paragraph 27.8 recognises that consideration to the design of buildings is essential to achieve sustainable development that reduces the demand for energy and improves energy efficiency through the choice of location, design and materials.

1.3.21 In conclusion, the Local Plan accords with s19 (1A) of the Planning and Compulsory Act 20014. It includes policies that contribute to the mitigation and adaptation to climate change. The Local Plan recognises that most development needs should be met in sustainable locations in or adjacent to urban areas and seeks to ensure that effects of climate change are minimised. The Local Plan includes policies which contribute towards the mitigation of, and adaptation to, climate change impacts including flood risk, water efficiency and the use of renewable and low carbon energy.

Q1.4 Has the Council engaged constructively, actively and an on-going basis with all relevant organisations on the strategic matters that are relevant to the Plan's preparation, as required by the duty to co-operate?

- 1.4.1 Yes. Engagement with the relevant organisations is set out in the Council's Duty to Co-operate Statement (SD10), which was submitted to the Secretary of State alongside the submission plan.
- 1.4.2 Engagement with the relevant organisations commenced in the early stages of plan making, and in particular, during the Issues and Options consultation held in 2015. This formal engagement was followed by the Preferred Options consultation in 2017, and the two Pre-Submission consultations held in 2018 and 2019.
- 1.4.3 The level of engagement was proportionate to the issues that arose from the consultation responses and tailored to address those issues where possible, by cooperating effectively and constructively with the relevant Duty to co-operate partners to achieve a sound Local Plan. This process involved several formal and informal meetings being undertaken with the relevant organisations. Duty to co-operate meetings were also held with the neighbouring authorities to discuss the Local Plan review. The formal Duty to Co-operate meetings are evidenced in the Duty to Co-operate Statement (SD10) appendices.
- 1.4.4 To work towards achieving positive outcomes, Statements of Common Ground were produced with key partners to confirm where agreement had been reached on strategic, cross boundary matters and where issues remain unresolved. At submission stage, the Council had completed fourteen Statements of Common Ground (SofCG). These were all submitted alongside the submission plan. The SofCG with Bromsgrove District Council was agreed by their Members at a Full Council meeting which was held after the submission of the WFDC Local Plan. This version was submitted to the Inspector in August 2020 (ED8). The previous version had been signed by Worcestershire County Council and Wyre Forest District Council and was submitted alongside the plan as SD10b.
- 1.4.5 The signed Statements of Common Ground confirm the Council's record of cooperation is accurate and that each of the authorities agree the duty to co-operate has been fulfilled by WFDC. The SofCG are provided within the appendices of SD10; the signed SofCG (ED8) following submission can be viewed in the examination documents on the examination website.
- 1.4.6 The positive outcomes achieved by the SofCG process helped to shape the Table of Modifications for consideration by the Planning Inspector

(March 2020)', which was submitted alongside the Local Plan as document SD12.

Q1.5 Does the Plan seek to address the needs of persons or groups with protected characteristics that are expected to arise over the Plan period, having regard to section 149(1) of the Equality Act 2010?

- 1.5.1 To ensure the Local Plan is compliant with the Equality Act 2010, in particular the Public Sector Equality duty under section 149(1), the Council carried out a full Equality Impact Assessment (EIA). Further details can be found in the Equality Impact Assessment report (SD14).
- 1.5.2 The EIA report (SD14) concluded that the majority of policies within the Local Plan would have either a positive or neutral effect. A potential adverse differential impact was identified for Gypsy and Travellers (G&T) who may wish to live on G&T sites as opposed to bricks and mortar. A GTAA study was undertaken by the Council in 2014 which projected through to 2036 being the end of the Plan period, but the EIA recognised that this GTAA study needed to be refreshed and that such a refresh would be undertaken during 2020.
- 1.5.3 The EIA report concluded that a new Gypsy and Traveller assessment of housing need was necessary to identify if there are any unmet needs during the plan period. A Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2020) was subsequently carried out to provide the Inspector with an updated position. This was submitted to the Inspector as document ED15. For details on the Council's response to the need identified in the GTAA (2020), see the Council's hearing statements for Q4.7 and Q8.3.
- 1.5.4 The overall conclusion of the EIA report was that the Local Plan is considered to be 'sound' in terms of EIA.