

Equalities and Communities Impact Assessment

Name of Officer/s completing assessment: Kate Fisher

Date of Assessment: 14th August 2025

1. What is the proposed Policy? (please provide sufficient detail)

For the purposes of the assessment the term 'Policy' relates to any new or revised policies, practices or procedures under consideration.

The proposed new document is the South Norfolk and Broadland Design Code Supplementary Planning Document (SPD). This is a new document produced to guide the design of future development within the districts of South Norfolk and Broadland. Its principal aim is to raise the design quality of new residential development, ensuring that it is visually attractive, functional, and sustainable, whilst respecting the local character and responding to community needs. The aim of the Design Code is to establish clear, practical standards for new neighbourhoods and streets, public spaces, green infrastructure, building forms, and materials, to support the delivery of high-quality design.

The new Design Code is intended for use by decision makers (including Development Management officers and Members), as well as developers preparing schemes for sites throughout both districts. It will also support the drafting of reasoned decisions and appeal statements. The Design Code is supported by a new Character Assessment for Broadland District, the existing Character Assessment for South Norfolk, as well as an Assessment Framework intended to guide discussions and negotiations around emerging schemes. The Character Assessments provide a historical overview of the vernacular architecture, the specific local landscape types, and the character of key historic settlements, establishing a clear context for new developments. A joint Design Code has been prepared for both areas reflecting the settlement patterns of South Norfolk and Broadland, both of which are characterised by urban fringe settlements around Norwich, main towns, and then villages in a rural hinterland. This continues the approach established within the Greater Norwich Local Plan. Separate chapters provide guidance on designing well-connected and cohesive neighbourhoods, attractive, safe and healthy streets, as well as practical, sustainable and well-designed homes.

Currently, South Norfolk and Broadland Councils utilise a range of guidance documents, including local policies from the development plan and supplementary planning documents. Whilst these provide direction, they vary in detail and coverage. The new Design Code will build upon these foundations, offering a more consistent and robust framework applicable to all new residential development across the districts for proposals between 1 and 500 dwellings.

The Design Code has been prepared in accordance with the National Planning Policy Framework (NPPF), which requires local planning authorities to ensure new development is well-designed and to prepare design codes where appropriate. This is reflected in the requirements of Policy 2 of the Greater Norwich Local Plan (GNLP). It also draws directly on the National Model Design Code issued by the Department for Levelling Up, Housing and Communities, which sets out best practice for design codes nationally, whilst at the same time reflecting the local context of each District. As an SPD, the Design Code does not introduce new policy, nor does it allocate new land for development. Its purpose is the successful implementation and interpretation of the adopted development plan for each District.

In assessing this new draft SPD, officers referred to the duties on councils. These are that the Council must not discriminate in the way its activities are designed, developed and delivered, and must consider its duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2. Which protected characteristics under the Equalities Act 2010 does this Policy impact? (indicate whether the impact could be positive, neutral, or negative)			
Protected Characteristic	Potential Impact		
	Positive	Neutral	Negative
Age	✓		
Disability	✓		
Race		✓	
Sex		✓	
Religion or Belief		✓	
Sexual Orientation		✓	
Marriage/Civil Partnership		✓	
Pregnancy/Maternity		✓	
Gender Reassignment		✓	

3. Which additional Communities characteristics does this policy impact?			
Health	✓		
Place including Rurality	✓		
Low Income and Poverty	✓		

4. What do you believe are the potential equalities impacts of this policy?

The production of the Design Code has been led by Tibbalds Planning and Urban Design, working closely with Council officers and stakeholders. Tibbalds has provided expertise in best practice, facilitated stakeholder and online community workshops and consultation events, and managed the drafting and refinement of the Code to align with national guidance and local aspirations. Tibbalds utilised an online platform, Placechangers, to host three separate rounds of public engagement, each of which was open for comment for six weeks.

Engagement has played a central role throughout the Design Code preparation process and has been inclusive and ongoing. Consultation has involved a wide range of stakeholders, including town and parish councils, community representatives, statutory bodies, and the general public.

This engagement has been used to identify priorities, understand local context, and ensure the Code is responsive to the needs of diverse communities within both districts. A composite draft of the Design Code was subject to a 6-week period of public engagement prior to final amendments being agreed to the document (pre-consultation).

Looking to the future, the Design Code promotes ongoing developer engagement within local communities. This will provide further opportunities for input by both existing and future residents, including both the protected characteristics groups and the communities characteristics groups.

Positive Impact
<p>Overall the guidance within the SPD will have a direct positive impact on all people within the protected groups above by creating more inclusive and accessible developments and spaces for them to enjoy. This will be of benefit to all members of communities throughout both districts, including residents within existing communities and those who move into the new developments. This includes groups with protected characteristics.</p> <p>More specifically, there will be improvements to the accessibility and inclusiveness of open spaces and play areas, as well as improvements to the pedestrian and cycling routes through developments, arising from the implementation of design codes within this document. This will be of particular benefit to people within the age and disability protected characteristics groups (including both younger and older people). The SPD includes a particular focus on creating cohesive developments that are accessible to all people, (including inclusive play spaces and green spaces), providing directional way-markers through new developments to aid with navigation and, more locally, the provision of seating along pedestrian routes through a neighbourhood for those who may be less mobile.</p>
Negative Impact
<p>The guidance within the SPD has not emerged as relevant to, or as having a negative impact on any of the protected characteristics.</p>
Neutral Impact
<p>The SPD is not expected to have a significant impact on any of the following protected characteristics groups:</p> <ul style="list-style-type: none"> • Race, Sex, Religion or Belief, Sexual Orientation, Marriage/Civil Partnership, Pregnancy/Maternity or Gender Reassignment <p>The inclusive approach to design that has been adopted throughout the Design Code ensures that all groups will benefit from the same positive impacts (whilst it is recognised that those noted specifically above in the positive impacts section will see an overall positive impact). The Design Code seeks to promote equitable access for all residents, without singling out any particular group for specific advantages or disadvantages.</p>

5. What do you believe are the potential communities impacts of this policy?

Positive Impact
<p>Place including rurality</p> <p>The Design Code identifies the broad geographic areas within the districts and sets out different design responses within these. Due to the geographical context of each district, many residents live within rural areas.</p> <p>The Design Code promotes high standards of inclusive design across all new residential development, including within rural communities. Emphasis is placed on achieving inclusive and accessible design that creates cohesive and sustainable forms of development, which also integrates with existing established communities. Identifying opportunities for physical</p>

connectivity between existing and new development is a key code intended to achieve this outcome, as is a design approach that reflects the existing character, heritage and landscape considerations of a local area where this is appropriate.

Through the implementation of the Design Code, there will be no differentiation between design quality and standards in either a rural location or an urban setting, and opportunities to improve connections between existing and new communities will be maximised.

Health

The creation of safe, active and healthy communities is a key theme throughout the Design Code. The Design Code promotes ease of access to public amenity spaces, accessible play areas for people of all ages and abilities and a strong relationship with the surrounding natural landscape. Physical activity is promoted through the requirements for legibility through sites, including the creation of new pedestrian and cycle routes as appropriate. It is also expected that wherever possible new routes will connect with existing routes to provide enhanced opportunities for recreation.

The Design Code recognises the importance of nature and natural outdoor spaces on the wellbeing of communities as a central theme throughout the coding. Developers will be expected to include high quality open spaces within their schemes, as well as appropriate landscaping and planting which will play a role in supporting the physical health and mental wellbeing of residents.

In accordance with adopted policy, the Design Code requires the provision of specialist housing so that the needs of different groups can be met within local communities. In addition, the Design Code also requires equal access to open spaces and play areas for all users.

Low Income and poverty

The Design Code positively promotes tenure neutral design for all forms of new residential development, including affordable housing of all types and specialist housing. The Design Code provides clear coding for developers and decision makers regarding design expectations for affordable housing and includes a code stipulating that design layouts avoid concentrating these homes in the least attractive areas of development sites. The Design Code also requires the integration of specialist and affordable homes in clusters throughout new developments in order to avoid segregation within communities.

Similarly open spaces and play areas must be of equitable standards throughout sites, with affordable homes having equal access to public spaces, play areas, infrastructure and local amenities and facilities. Private amenity spaces associated with dwellings will need to be of a suitable size and standard for all new homes (including affordable housing) to meet the requirements of the Design Code.

This design approach will create places that are welcoming to all, including those who experience a low income or poverty.

Negative Impact

None identified

Neutral Impact

None identified

6. How is it proposed that any identified negative impacts are mitigated?

The Equalities and Communities Impact Assessment for the South Norfolk and Broadland Design Code has not identified any negative impacts arising from the implementation of coding within this document. Any subsequent issues that may arise would likely be site specific and would be most effectively managed and mitigated through the planning application process.

The draft SPD is anticipated to have a neutral-positive impact on communities throughout South Norfolk and Broadland, reflecting the aspirational content of the Design Code. Whilst there may be some positive impacts, they are expected to be inclusive and equitable, ensuring that no specific group is disproportionately affected. Conversely, if the Design Code is not implemented, there is a risk of continued variation in design quality and missed opportunities to support inclusive, sustainable, and healthy communities across South Norfolk and Broadland.

A six-week public consultation will be carried out on a draft version of the SPD and its supporting documents including the draft Equalities and Communities Impact Assessment, consulting with a broad range of audiences such as parish and town councils/councillors, statutory bodies, interested groups and the general public. This will provide the opportunity for the local community and other interested parties to provide comments in relation to any protected characteristics, with their representations being considered when amending the final version of the SPD.

Any positive or negative impacts that may arise following the adoption of the SPD will assist officers in providing measures that seek to mitigate any negative impacts on any of the protected characteristics.

Signed by evaluator: Kate Fisher

Signed by responsible head of department: Ben Burgess

Please send your completed forms to equalities@southnorfolkandbroadland.gov.uk to be reviewed and stored in accordance with our legal duty.

Please send a copy of the reviewed document to equalities@southnorfolkandbroadland.gov.uk

This document was updated March 2022

Guidance – Completing an Equalities and Communities Impact Assessment

<p style="text-align: center;">PROTECTED GROUPS</p> <p>The Equality Act 2010 identifies 9 protected characteristics:</p> <ul style="list-style-type: none"> • Age • Disability • Sex • Sexual Orientation • Race • Religion • Pregnancy & Maternity • Gender Reassignment • Marriage & Civil Partnerships 	<p style="text-align: center;">PUBLIC SECTOR EQUALITY DUTY ('PSED')</p> <p>The PSED requires us, as a Local Authority, to undertake the following:</p> <ul style="list-style-type: none"> • Eliminate unlawful discrimination, harassment and victimisation Consider whether a policy, procedure or practice is likely to treat anyone less favourably or disadvantage them because of a protected characteristic. • Advance equality of opportunity Consider measures to advance equality of opportunities for protected individuals / groups • Promote good relations Take steps to tackle prejudice and promote understanding between groups. e.g. hold talks for staff/the public; get involved in local events; promote local events run by protected groups.
<p>CONSIDERATION TO BE GIVEN TO:</p> <ul style="list-style-type: none"> • Health • Place including Rurality • Low Income and Poverty 	<p style="text-align: center;">COMMUNITY IMPACTS</p> <p>In addition to the 9 characteristics protected under legislation you are also asked to consider how the proposed policy could impact upon:</p> <ul style="list-style-type: none"> • Achieving our priorities of Health and Wellbeing and Inclusive Growth • Informing and contributing to the development of sustainable communities through our Locality Offer <p>This holistic approach constitutes good practice and demonstrates that a robust assessment has been undertaken, evidenced and reviewed.</p>

Questions	Answers
When should an Equalities and Communities Impact Assessment (EqCIA) be undertaken?	<p>Equalities and Communities Impact Assessments (EqCIAs) should be undertaken when a policy practice or procedure is revised/created which may impact on a protected group. We must ensure these impacts are considered at an early stage. It is important to remember that impacts may have a positive or negative effect.</p> <p>Additionally, it is good practice to consider the additional characteristics of <i>Health, Place including Rurality and Low Income and Poverty</i>. While this demonstrates that a thorough assessment has taken place it also evidences how proposed policies, practices or procedures contribute to achieving our agreed priorities.</p>
Why complete an EqCIA?	If we fail to do so this may be open to legal challenge, causing reputational & financial harm.
How do we undertake an EqCIA?	Complete the attached EqCIA. Consider consultation with representatives of potentially affected groups. Send the completed EqCIA to your Head of Department and then to the Equalities inbox – Sinead Carey at equalities@southnorfolkandbroadland.gov.uk
What questions should I ask myself when completing the EqCIA:	<ol style="list-style-type: none"> 1. Could the new/revised Policy, Procedure or service, or the way it is carried out, have an impact on one of the protected groups? 2. Is a negative impact unavoidable? What could be done to avoid/mitigate? Can it be justified? Can we achieve the aims without having the same negative impact?
Do I need to consider consultation ?	<p>Yes, quite possibly. To understand the impact of a change, consultation can be vital. Consultation may involve:</p> <ul style="list-style-type: none"> • Discussion with colleagues across the Council to identify impacts. • Engaging with representatives of relevant protected groups or with the public directly. • Contacting other local authorities. • Undertaking desk top research. <p>Consultation can include: face-to-face meetings; focus groups, questionnaires (including on the Council website) and discussion papers.</p>
Do I need to review an EqCIA?	Yes, these should be reviewed periodically by you to ensure the impacts were correctly identified and that steps have been taken to mitigate against any negative effects.
Any questions?	Please email equalities@southnorfolkandbroadland.gov.uk should you have any questions.
Who do I send the completed EqCIA to?	Please send the completed EqCIA to equalities@southnorfolkandbroadland.gov.uk and your Head of Department.