

South Norfolk Village Clusters Housing Allocations Plan (VCHAP)

Regulation 19 Consultation on Alternative Sites and Focused Changes

Equality Impact Assessment (EqIA) Addendum, April 2024

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Assessing the impact of the South Norfolk Village Clusters Housing Allocations Plan (The Village Clusters Plan) upon different sections of the community.

Background

- 1.1 The Council consulted on the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) Pre-submission (Reg. 19) version from January – March 2023. This set out the Council's chosen Plan including the Objectives for development across the village clusters, site-specific policy allocations with background supporting text.
- 1.2 In addition, the January 2023 Equalities Impact Assessment ([EqIA](#)) for the VCHAP Pre-submission (Regulation 19) version included a screening for the Equality Impacts of the Village Cluster Plan Objectives and Settlement Limit Review in Table 2 (pages 6-8). As well as a review of the site-specific allocations it set out to identify whether the plan encouraged equality between different groups. The assessment identified that the Objectives and site-specific housing allocations are likely to have either a positive impact, or no differential impact on the different protected characteristics. The Plan seeks to make improvements to the existing context wherever possible, and the scale and type of land use proposed via the VCHAP should also be considered within the context of the wider allocations, and growth, set out in the Greater Norwich Local Plan (GNLP). As the Council intends to keep the Plan Objectives unchanged this addendum should be read alongside the previous EqIA.
- 1.3 Following the review of the representations submitted in response to the Pre-submission (Reg 19) consultation it became apparent that changes were necessary that result in the loss of 30 units within the Village Clusters Plan. As such the VCHAP would not deliver the minimum 1,200 dwellings required in the Greater Norwich Local Plan (GNLP). The Council consulted on ways to address the loss of these units through a focused Regulation 18 consultation held from December 2023 – February 2024, updating the EqIA once again.
- 1.4 Continuing on from a review of the responses gathered at the previous consultation stage, the Council intends to publish a focused Regulation 19 version of the Plan incorporating new site allocations and modifications, providing a further opportunity to comment on the 'soundness' and 'legal compliance' of the final choice of sites This EqIA has been updated in light of these changes.

Introduction

- 1.5 This EqlA Addendum builds upon the Equality Impact Assessment (EqlA) published in January 2023 to accompany the VCHAP Pre-Submission version. This document is an addendum to the above and in addition to the EqlA published at the Regulation 18 focused consultation stage. It reviews the Focused Consultation (Reg 19) Village Cluster Housing Allocation Plan (VCHAP) to assess any potential impacts on equalities resulting from the 10 proposed changes to site-specific housing allocations arising from the 'Alternative Sites and Focused Changes' (Reg 18 FC) consultation.
- 1.6 The South Norfolk VCHAP aims to deliver sustainable growth within the more rural parts of South Norfolk. The Plan is being developed alongside the Greater Norwich Local Plan (GNLP) and in accordance with the Government's national planning policies and guidance (the GNLP is accompanied by its own EqlA). The main aim of the Plan is to allocate a series of smaller sites, 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total. The Plan also defines the Settlement Limits for the villages within these clusters, making provision for further, smaller sites of up to 11 dwellings.
- 1.7 The Focused Consultation (Reg 19) version of the VCHAP sets out 3 new site allocations, along with 7 modifications to existing allocations. These have been selected taking into account the three Plan Objectives set out in the January 2023 Regulation 19 document.
- 1.8 All sites have previously been assessed and published as part of the earlier consultation stages. Details of how the site selections and modifications were made are included in the consultation document itself. The Council has also updated the site assessments for the sites included in this focused consultation, setting out the reason for their inclusion, and these updated assessments are published as part of the Supporting Documents.
- 1.9 The consultation document sets out a reasoned justification for each site, plus the background text for the cluster/settlement within which the sites sit, as originally published at the Regulation 19 stage.
- 1.10 The consultation runs from **9am Monday 12 August to 5pm on Monday 7 October 2024**. Representations submitted in response to the Focused Consultation should be related to the soundness and legal compliance of the proposed site modifications. The remainder of the Pre-Submission (Reg 19) document is (a) not part of this consultation and (b) will be taken forward to be submitted to the Secretary of State once decisions on the additional sites have been made.

Next Stage

- 1.11 Once the current focused consultation is completed, a review of responses relating to the 'soundness' and 'legal compliance' of the final choice of sites will commence. When the Council is satisfied of the legal soundness of the Plan, it will formally submit the Plan to the Secretary of State for independent examination.

Notifications

- 1.12 In accordance with the Local Planning Regulations (2012), the Council will notify anyone they consider it appropriate who has an interest, including the specific and general consultees as listed in the Regulations, including:
1. people who live in, work in and visit South Norfolk;
 2. individuals, organisations, landowners and development companies needing to make planning applications to the Council, and the professional planning agents and architects who represent them;
 3. public sector organisations (e.g. Norfolk Constabulary, Norfolk County Council);
 4. housing associations, registered social landlords and other organisations in the voluntary sector;
 5. general consultees (e.g. local interest groups such as those representing different racial, ethnic or national groups, different religious groups, disabled persons, Gypsies, Travellers and Travelling Showpeople and older or younger people);
 6. statutory bodies (e.g. the Environment Agency, Natural England, Historic England) and;
 7. neighbouring local authorities.
- 1.13 It is important to recognise that the needs of different equalities groups are considered throughout the process. The consequences of not recognising and addressing the different needs of different groups, could result in discrimination or a failure to promote equality of opportunity for everyone. As a result, all of the protected characteristics under the PSED are considered within this report as part of scoping and screening exercises.

Legal Context

- 1.14 Local authorities are specifically required to undertake an EqlA under The Equality Act 2010. The requirement to undertake an EqlA stems from the duty placed on local authorities to eliminate unlawful discrimination in carrying out its functions, and to promote equality of opportunity.
- 1.15 The Equality Act 2010 (Amendment) Regulations 2012 requires local

authorities to ensure that their plans and policies do not adversely impact upon any group with 'protected characteristics', and furthermore should encourage greater equality between different groups. The following characteristics are protected characteristics under the Public Sector Equality Duty (PSED):

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation

- 1.16 Applying the Public Sector Equality Duty to local plans, it is important to assess whether the Objectives and site-specific allocations in the South Norfolk Village Clusters Housing Allocation Plan have an impact (positive or negative or non-applicable) on any of the protected groups set out above, and how the Plan addresses socio-economic inequality.

Methodology

- 1.17 In producing the EqlA, various sources of information have been gathered by the Officer team involved in preparing the Plan in order to determine whether the VCHAP is likely to have an impact on, or discriminate against different groups, within the community. Such sources of information include the most recently available Census data, along with national and local statistics. Drafting of the Plan has also included the involvement of a range of organisations and consultees throughout the preparation period, including at the three previous consultation stages. As such, the Council will continue to review the approach taken prior to formally submitting the Plan to the Secretary of State for independent examination. The process for reviewing the EqlA will continue to run in tandem with the production of the VCHAP which has been an iterative process, reflecting the evolution of the Plan itself.
- 1.18 The [EqlA](#) produced for the Pre-Submission stage (Reg 19) published in January 2023 provided a screening for the Equality Impacts of the Village Cluster Plan Objectives and Settlement Limit Review in Table 2 (pages 6-8). In addition, it considered the site-specific allocations it set out in order to identify whether the plan encouraged equality between different groups. This EqlA Addendum provides an assessment of its impact on protected groups categorised by theme rather than by individual site.

- 1.19 This approach recognises the similarities between the sites being allocated and therefore avoids unnecessary duplication, whilst still presenting the key findings in an accessible format. Where the screening exercise identifies that the Village Clusters Housing Allocation Plan has an impact upon one or more groups this is explained in more detail. If any negative impact exists, the site allocation has been subject to further consideration. The requirement for a full Equality Impact Assessment is considered with the aim of avoiding negative impacts upon the identified group or groups, and to take steps to meet the needs of people from protected groups where these are different from the needs of other people. In the instance that an impact on a protected group is identified the report will conclude with a proposed method of monitoring that impact.
- 1.20 The scoping exercise that underpinned the EqIA published in January 2023 is unaltered for this addendum. This determined that the residential land use policies proposed in the Village Clusters Housing Allocation Plan are unlikely to impact upon a person's personal identity or relationships. Therefore, the following protected characteristics have been scoped out of this report: gender reassignment, marriage and civil partnership, race, religion, sex and sexual orientation. This approach is carried through for the purposes of this EqIA Addendum.
- 1.21 The screening exercise therefore focused on the potential impact of the objectives and policies within the Plan (positive and negative) on people with the following protected characteristics:
- Age
 - Disability
 - Pregnancy and maternity
- 1.22 In addition to these protected groups, the Council has also considered it appropriate to assess the community impacts on other groups within the village cluster areas to ensure a robust assessment has taken place. The impact of the Plan on the following additional groups (in the context of the protected characteristics as defined by the Equality Act 2010) has therefore also been assessed:
- Health
 - Place (including 'Rurality')
 - Low Income and Poverty

The Equalities Profile of South Norfolk

- 1.23 An 'Equalities Profile' for South Norfolk can be found in Appendix 1 of the [EQIA](#) (Dec 2022), including Table 1, page 4 which sums up the baseline information on the different protected characteristics, which are covered in the following assessment.

The Equality Impact Assessment

Objectives and Settlement Limit Review

- 1.24 The EqIA for the Pre-Submission stage published in January 2023 included the screening process for the VCHAP Plan Objectives and the Settlement Limit review. As the Council is not proposing to make any changes to the Objectives or further Settlement Limit changes, no changes to the December 2022 EqIA are required.

Site Specific Site Allocations Impacts

- 1.25 This EqIA Addendum only considers the impact of the 3 new site allocations and 7 modifications to policies.
- 1.26 As such, it sets out to identify whether any adverse impacts arise for any group with protected characteristics and establish whether the plan encourages greater equality between different groups. In doing so, it is important to recognise that the Village Clusters Housing Allocation Plan allocates only a small proportion of the total development and infrastructure being delivered across the entire Greater Norwich Local Plan area and as such the impacts identified within this specific EqIA must also be considered within the wider context of allocations being made within the remainder of the Local Plan. The impacts of allocations made in the Greater Norwich Local Plan are set out in the associated EQIA prepared to support the production of that Plan.
- 1.27 The Plan will benefit the wider community across South Norfolk and not specifically those with protected characteristics. However, there is the potential for some direct or indirect impact on different groups.
- 1.28 Applying the Public Sector Equality Duty to the VCHAP, an overall assessment of the positive and/or negative impacts of the Plan has been made and summarised below, grouped together by theme:

Age

- 1.29 The Village Clusters Plan Regulation 19 Focused Consultation (Reg 19) modifications are likely to have a positive overall effect on all age groups, including persons within the younger and older protected characteristic groups. This is mainly due to fact that it aims to meet the housing requirements in the GNLP by seeking to replace the number of homes lost since the Pre-submission (Reg 19) stage during Jan – March 2023.
- 1.30 In general, the alternative housing sites have the potential to benefit people of all ages, including persons within the younger and older protected characteristic groups by enabling a wider choice of new housing types and sizes which will enable them to move in the future

should they wish as their circumstances or family size change over time.

- 1.31 In addition, all of the sites would be required to provide at least 33% of affordable homes for as per GNLP Policy 5: Homes.
- 1.32 Families and young children require homes in close proximity to schools and recreation facilities. The proximity and accessibility of allocated sites to key services, including play areas and primary education provision, continues to be a key consideration in the assessment of sites,
- 1.33 In addition, whilst all allocated sites may be expected to support the existing education facilities within the cluster via increased pupil numbers, Gillingham also includes an area of land of 0.5ha to be safeguarded for the future expansion of Gillingham St Michael's Primary School.
- 1.34 For older age groups and those who may be less mobile, access to services becomes more important. Access to services and facilities is considered as part of the site assessment process. Improvements to existing pedestrian footpaths feature in the policy requirements of several specific allocations, including to the wider pedestrian network.
- 1.35 Also, depending on the size of sites allocated, there is also the potential that some sites can also deliver community facilities such as the new site promoted during Reg 19 site ref SN6000 – Land north of Chapel Street Barford, which initially was considered for a relocated village hall and playing pitch, plus retention of the children's play area. Subsequent discussions have expanded this to additional community land which will benefit all ages too, assisting to prevent social isolation.
- 1.36 It is recognised that not all village clusters benefit from the same range of services, or from the full range of services that would typically be available to residents of higher order settlements. This is largely due to the rurality of South Norfolk, where it is common for residents to rely on private vehicles and/or public transport to travel short distances to the nearest local service centre. The Plan does, however, seek to improve connectivity in and around settlements wherever possible.
- 1.37 Boosting the vitality of existing communities/ settlements via the dispersal of new development throughout the village clusters will support the ongoing provision of existing facilities and services, and may support the growth and development of new amenities at a local level as the community grows. This positive impact may benefit those age groups within the protected characteristic groups, as well as different ages who choose to become involved with their local

community facilities (for example, local businesses or community groups).

- 1.38 The Village Cluster Plan seeks to ensure housing mix that is in line with needs identified through the Strategic Housing Market Assessment (SHMA) and the Norfolk Study of Specialist Housing for Older People, which can reasonably be expected to help ensure that age-based needs are met across Plan. Population projections will require housing development to keep pace with anticipated growth in demand. Demand for certain types of accommodation may change, for example the demand for housing for elderly persons may increase as the numbers of residents falling into these categories also increase and development proposals will be expected to have regard to these changing requirements. Ensuring a balanced approach to housing mixes on allocated site will benefit and promote the equality of opportunity, whilst also promoting social cohesion within these communities, and facilitating the growth of local support networks.

Disability

- 1.39 Due to the nature of the site-specific allocations within the Village Clusters Housing Allocation Plan, the specific impacts arising from the Plan on people with disabilities are likely to be limited. Housing design standards benefit people with disabilities where there is a focus on accessible design. The GNLP strategic policies which the site allocations need to comply with include a range of criteria which aim to improve access to services for all residents, seeks a percentage of adaptive homes, encourages use of Building for Healthy Life and requires a Health Impact Assessment for some schemes.
- 1.40 It is important to recognise that within this protected group it is considered most likely that persons with limited mobility would be impacted most by the Plan; however, it should be recalled that this Plan forms just one element of the strategic growth and development within the Greater Norwich area and as such the impacts of new development and infrastructure on this protected group should be considered as a whole. On balance it is considered that the VCHAP may have a positive impact on less mobile residents who wish to live within the rural areas of the District, noting the limitations of the Plan. Residents who require access to more specialist or diverse services and facilities may have seen a greater positive impact if the Village Clusters Housing Allocation Plan had directed more growth to the larger settlements which have the potential to offer a greater range of services. However, such needs are likely to be effectively addressed by the Council's emerging planning strategy when taken as a whole.

- 1.41 Overall, the VCHAP seeks to secure improvements to local facilities and services via improved connectivity and accessible development sites. Inevitably not all settlements and/or clusters provide a full range of services, however the presence and ease of access to existing facilities and amenities has been an important part of the site assessment and policy preparation process. A number of site-specific policies include a requirement for crossing points across the highway which will be of benefit to those persons with limited mobility.
- 1.42 Similarly, the provision of car parking areas associated with local schools may also enable disabled carers and/or children to attend these sites more readily. Improving the routes to existing facilities not only encourages access but also may open up these facilities, and the user groups of these facilities, to a wider group of residents.

Pregnancy and Maternity

- 1.43 The Village Clusters Housing Allocation Plan has a neutral-positive impact on persons within the protected group, 'Pregnancy and maternity'. The VCHAP recognises that the availability and accessibility of a number of different facilities are important to local communities, as evidenced in the Site Assessment process. As previously noted during the Plan production period and whilst reviewing new or alternative sites the Council engaged with the NHS Integrated Care Services (ICS) to better understand the constraints and opportunities afforded by the emerging Plan. It is clear that existing medical resources are under increasing pressure across the District, in common with the country as a whole. The dispersal of allocated sites throughout the village clusters does not focus new development solely in locations that have existing medical facilities. Recognising the wider constraints that exist within the NHS at present, this approach will enable residents to seek local health provision where it exists, and it also supports the work of the outreach NHS workers who operate in the local community (for example, midwives and support healthcare workers). In this respect, the Plan may be considered to have a neutral impact on this protected group. Inevitably a wider range of medical facilities and services will be more readily available and accessible in the more developed settlements and towns and an increased level of housing growth in these larger settlements would potentially have a more positive impact on this protected group. Although the overall scale of growth proposed within the Village Cluster Plan as a proportion of that across Greater Norwich as a whole does need to be taken into account in weighing the significance of this effect.
- 1.44 As noted in the previous sections however, the Plan seeks to improve connectivity and accessibility between sites and existing services/facilities, whilst also making wider improvements to the highway and/or

footpath network where this is considered to be reasonable and proportionate. In this respect the VCHAP may be considered to have a positive impact on this particular protected group through the improved linkages that will exist in the settlements. This connectivity can prove to be incredibly beneficial to those who are pregnant, as well as parents/ carers of babies and young children, providing access to existing local support groups and facilities and support networks that exist within the local community.

Health

- 1.45 Forward planning for healthcare services is a high priority. It is important to recognise that The Greater Norwich Local Plan Infrastructure Report includes the need for health care infrastructure established through the Health Infrastructure Delivery Plan (HIDP) drawn up by the Sustainability and Transformation Partnership (STP). The HIDP has been produced in collaboration with the local Clinical Commissioning Groups (Norwich, North Norfolk and South Norfolk) and NHS Foundation Trusts (Norfolk and Norwich University Hospital, Norfolk Community Health and Care and the Norfolk and Suffolk trusts).
- 1.46 The GNLP has a range of strategic policies which aim to improve access to services for all residents, seeks a percentage of adaptive homes, encourages use of Building for a Healthy Life, and requires a Health Impact Assessment for some schemes which will impact the Site Policies in the VCHAP.
- 1.47 As part of the preparation of the Village Clusters Housing Allocation Plan, the Council has sought engagement with the NHS. With regards to access to physical services and facilities it is inevitable that many of these are focused within larger settlements and towns, often with smaller clinics and surgeries operating at a local level. Opportunities to expand existing NHS services via the provision of additional sites and facilities is not considered to be possible as part of the VCHAP, due to both the scale of development proposed on the sites being allocated as well as the wider availability of resources currently available within the NHS (the latter issue being recognised as a wider concern at a national level). Focusing development within larger settlements with a greater range of medical services and facilities available may have had an increased positive impact on this protected group when compared to the approach to growth taken in the Plan.
- 1.48 The VCHAP has identified opportunities to enhance the public realm and access to the surrounding countryside via new connections to the existing Public Right of Way networks (PRoW). These connections will encourage recreational use of the countryside which can improve health and wellbeing, including that of those people identified as being

within protected groups.

- 1.49 The Village Cluster Housing Allocation Plan will deliver a range of housing to meet local housing needs which it is anticipated will improve both the quality and the availability of the housing stock throughout the Plan area. This may have a positive impact on those people considered to have low-poor health by addressing issues that arise by virtue of overcrowding and sub-standard housing.

Place. Inc Rurality

- 1.50 Based on the Equalities profile for South Norfolk in the EqIA published in January 2023 over 75% of its population live in rural areas and in recognition of this meeting the needs of these people effectively is vital to the ongoing success of these communities.
- 1.51 Whilst communities in rural and urban areas face many similar challenges, living within a rural environment can increase barriers to accessing services and facilities and present unique challenges to overcoming them. Whilst rural living also presents many opportunities in terms of health and wellbeing, it can increase the sense of isolation that may be felt by residents, particularly in the absence of support networks and local facilities and services. An alternative strategy to the allocation of sites within the Plan area, the concentration of new housing on larger sites within larger settlements, would fail to meet the needs of the large proportion of the District's residents who live within the rural communities. This alternative approach to the distribution of growth could result in the continued loss of existing services, facilities and community support networks that are currently available at a local level within the villages as residents move to new housing in the larger villages and towns.
- 1.52 The VCHAP has sought to address the barriers that have been identified where possible, noting however the limitations it faces due to the scale and type of development it proposes.
- 1.53 The improved connectivity promoted in site-specific policies, as well as new linkages to the existing Public Right of Way network, will aid in the integration of new housing developments into the existing community, as will the additional areas of open space required in compliance with existing Local Plan policy requirements.
- 1.54 The Village Clusters Housing Allocation Plan is considered to have a neutral impact on protected groups, but it is anticipated that it will benefit those working in rural areas seeking local housing, or existing residents who are looking to up/downsize but remain local to their community. Residents relocating to these areas will also support the existing services and facilities, including community groups, education provision and local businesses, all of which are critically important in

creating and maintaining a sense of local identity and a supportive community in a rural context.

Low Income and Poverty

- 1.55 The site-specific allocation policies are generally considered to have a positive impact on residents who are in poverty or have a low-income.
- 1.56 A key focus of the strategic policies set out in the GNLP is ensuring sites deliver an appropriate level of affordable housing to meet the needs of the resident population. For example, the site at Tacolneston where a planning application (2023/2234) for 29 affordable dwellings has been submitted which largely mirrors the VC TAC1REV site allocation.
- 1.57 Connectivity to services and facilities can prove to be a barrier to people on a low income or in poverty within the rural area. The site assessment process included a consideration of the availability and accessibility of the public transport network locally, as well as the distance of sites from existing services and facilities. It is recognised that in some locations access to public transport is limited and, as is typical in rural areas, there will inevitably be a reliance on private modes of transport which may negatively impact on low-income households.

Summary of Impacts

- 1.58 The Village Clusters Housing Allocation Plan has a clear opportunity to promote equality of opportunity, and enhance community cohesion, within the village clusters of South Norfolk. It is anticipated that this will benefit people within the following protected characteristic groups: age, disability and pregnancy and maternity and will also have a positive impact on those people who fall within the additional groups the Council has identified as being at potential risk of exclusion: health, place (specifically rurality) and those with a low income or in poverty.
- 1.59 Wherever possible the Council has allocated sites that are well located and accessible to existing services and facilities, adjacent to existing established communities. This promotes a social cohesion within these communities, providing opportunities for support networks to be maintained/developed and a sense of community to result.
- 1.60 Many of the alternative sites allocated are expected to improve local connectivity through improvements to the existing pedestrian footpaths, linkages into the Public Rights of Way network and informal footpath improvements. This will be to the benefit of all people in the identified protected groups, as well as the wider community. Site specific requirements for education facilities, as well as the provision of open space and connections to existing village halls, will be of benefit to all age groups, as well as those identified as being within protected

characteristics.

- 1.61 The housing mix required at a strategic level and delivered at a local level via the VCHAP will benefit those groups of people who perhaps require specialist housing, including affordable housing, but it will also improve the diversity and quality of the housing stock throughout the Plan area.
- 1.62 Inevitably an assessment of the Plan has identified that tensions do exist, and it is not always possible via the VCHAP to have a positive impact for all protected groups. Most notably, it is recognised that the alternative sites across a rural area present some challenges around providing access to a full range of services and facilities that the residents within these protected groups may require. An alternative distribution of sites that focusses development on larger sites, primarily in those settlements with a greater number of services and facilities could have addressed, at least in part, this constraint. However, in taking this approach the VCHAP would miss an opportunity to support a diverse range of services over a wider geographical area, many of which are important to the existing communities in the Plan area. Such an approach would also miss opportunities to strengthen and/or develop social cohesion within rural communities, possibly resulting in a deterioration of existing support networks and community groups.
- 1.63 Finally, the Plan is one element of a wider growth strategy for new housing development and infrastructure throughout the Greater Norwich area, and as such whilst it is correct to assess the impact of this Plan as a standalone document, it should also be considered holistically within the context of the opportunities that this wider growth will provide.

Conclusion

- 1.64 This EqlA Addendum has examined whether the Village Cluster Plan Focused Consultation Draft (Reg 19) site allocations and modifications have an impact (positive/negative/neutral) on different groups within the community. The assessment identified that alternative site-specific housing allocations are likely to have either a positive impact, or no differential impact on the different protected characteristics, having sought to make improvements to the existing context wherever possible, and that the scale and type of land use proposed via the VCHAP should also be considered within the context of the wider allocations, and growth, set out in the Greater Norwich Local Plan.