

Breckland Council

Integrated Assessment of the Breckland Local Plan Partial Review: Draft IA Report

July 2022

Quality Management

Title	Breckland District Council Integrated Assessment of the Breckland Local Partial Review: Draft Report	
Date	July 2022	
Project Code	CS/102506	
Client	Breckland Council	
Prepared by	Wil Harrison Adam Howarth	
Checked by	Martin Craddock	
Authorised by	Jackie Palmer	

Contents

1	Introduction	4
2	Sustainability Appraisal/Integrated Assessment	6
3	Scoping.....	9
4	Carrying out the Integrated Assessment.....	10
5	Assessing Local Plan Objectives	13
6	Integrated Assessment Outcomes.....	13
7	Identifying Indicators to Monitor the Partial Review of the Local Plan.....	16
8	NEXT STEPS.....	18
9	Appendix A	19
10	Appendix B Equality Impact Assessment.....	26
1	Introduction	27
2	The EqIA Policy Assessment.....	27

DRAFT

1 Introduction

- 1.1 Breckland District Council (“the Council”) has proposed amendments to Local Plan policy through a Partial Review of the Local Plan. The proposed amendments will alter the requirement set out in policy INF 03 of the adopted Breckland Local Plan 2019 to undertake a review of four issues within the Plan and submit them for examination by November 2022. The amendment proposes instead that a Full Update is undertaken and prepared for submission by 2026. The four issues currently identified through Policy INF 03 for early review were recommended by the Inspector following the examination of the current Local Plan. The implications of this proposed policy amendment will affect the timing and scope of future update of the Breckland Local Plan. However, the remaining policies of the existing Local Plan would continue to be used as the basis for determining planning applications until such time as they are replaced.
- 1.2 The Council has already commenced, in parallel with this Partial Review, preparation of its Full Update of the Local Plan and would be committed through the proposed amendment to INF 03 to submit this for examination by November 2026. The Full Update’s first stage will be a public consultation, in accordance with Regulation 18 of the Town and Country Planning regulations, in early 2023. Preferred options consultation is proposed in early 2024 and publication of draft consultation (Regulation 19) in 2025. Following this, the Local Plan Full Update is proposed for Submission in November 2026 and adoption in 2027 following examination in public.
- 1.3 Prior to initial consultation on the Full Update, Regulation 19 consultation on the Partial Review (that is assessed through this IA Report) will be undertaken in summer 2022. Following consultation the Partial Review is expected to be submitted to the Secretary of State for examination by November 2022. Adoption is expected in 2023 following examination in public and the proposed amendment being found sound by an independent Inspector.

- 1.4 This Integrated Assessment sits alongside preparation of this two-stage review of the Local Plan, with the framework developed proposed for consideration of both the Partial and Full Update. In May 2022, the Council consulted upon a draft Integrated Assessment (IA) Scoping Report that was finalised in June. Scoping is the first stage in the IA process. The Scoping Report identifies the type, nature and extent of potential effects that should be considered in assessing the sustainability of the partial review of the Local Plan.
- 1.5 Capita has undertaken IA on the draft amendment to Local Plan policy INF03 prepared by the Council so far in undertaking its Partial Review. This report sets out the conclusions and outcome of that assessment in relation to its potential sustainability affects. As an integrated assessment the Report additional gives consideration to the potential health and equality impacts of the proposal.

DRAFT

2 Sustainability Appraisal/Integrated Assessment

- 2.3 Section 19 of the Planning and Compulsory Purchase Act 2004¹ requires Local Planning Authorities to carry out Sustainability Appraisal (SA) of each of the proposals in a plan during its preparation. Section 39 of the Act requires that at every stage, plans must be prepared “with the objective of contributing to the achievement of sustainable development”. SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004² (commonly referred to as the “Strategic Environmental Assessment Regulations” or “SEA Regulations”). SA covers wider social and economic effects of plans, as well as the more environmentally focused considerations of SEA. It is common practice to cover the requirements of SEA within SA of Local Plans.
- 2.4 The Government states that the purpose of SA “*is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives*”³. It is an iterative process, which identifies and reports on the likely significant effects of the plan and the extent to which the implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.
- 2.5 The planning system has an important role to play in promoting and enabling sustainable development, particularly through the plan making process. The legislation states that the function must be exercised with the objective of contributing to the achievement of sustainable development⁴. The NPPF⁵ sets out a “presumption in favour of sustainable development”, which runs through

¹ <http://www.legislation.gov.uk/ukpga/2004/5/contents>

² <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

³ Strategic environmental assessment and sustainability appraisal, Planning practice guidance, Ministry of Housing, Communities & Local Government, 2020 <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁴ Planning and Compulsory Purchase Act 2004, section 39 <http://www.legislation.gov.uk/ukpga/2004/5/contents>

⁵ National Planning Policy Framework, Ministry of Housing, Communities & Local Government, 2021 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

both plan-making and decision-taking. This involves three overarching objectives:

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

2.6 SA of the partial review of the Local Plan will be joined by an assessment of the predicted impact upon health and equality. Together this will be known as an Integrated Assessment (IA). The IA will include three separate but complementary assessments in order to inform the development of the Local Plan. These are:

- SA: to assess the effects of the partial review of the Local Plan across a range of environmental, social and economic issues.
- Health Impact Assessment (HIA): to assess the effects of the Local Plan on the health and well-being of the population and its ability to access health-related facilities and services. This also addresses equalities issues and has some overlap with Equalities Impact Assessment.
- Equalities Impact Assessment (EqIA): to assess the effects of partial review of the Local Plan in terms of equalities issues, with a particular focus on

disadvantaged or excluded groups of people. EqIA helps identify where equality of opportunity can be promoted.

- 2.7 HIA and EqIA are separate processes but are however linked to and are considered within the SA process. IA helps to ensure that the overlaps of each process (SA/SEA, HIA and EqIA) are considered and managed, that gaps are avoided, and that they are used to ensure a consistent evidence base and consistent assessment results.

DRAFT

3 Scoping

- 3.3 The first step of the SA process is “scoping”. NPPG⁶ explains that the scoping stage should “set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives”.
- 3.4 A draft Report setting out this process was produced by Capita for Breckland Council and consulted upon from May 2022. The feedback received has been considered and relevant amendments have been made to an updated Report, finalised in July 2022.
- 3.5 From this scoping exercise, the baseline in relation to the key sustainability matters were considered. From this a series of sustainability issues were identified and 10 IA objectives were derived that were deemed appropriate to test sustainability effects of the proposed review of the Local Plan. The IA objectives cover social, environmental and economic elements. As already noted, HIA and EqIA can be integrated within an IA Specific IA Objectives have been prepared that would allow for assessment of Local Plan proposals upon health and equality (IA Objective 2).
- 3.6 To assist in the IA assessment, each IA Objective has a set of decision-aiding questions for policy assessment.

⁶ Strategic environmental assessment and sustainability appraisal, Planning practice guidance, Ministry of Housing, Communities & Local Government, 2020 <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Sustainability-appraisal-process>

4 Carrying out the Integrated Assessment

- 4.3 The scoping exercise also established a framework and set of decision aiding questions for carrying out the IA of the emerging review of the Local Plan. The established framework has been used to undertake IA on the proposed amendment to Policy INF03.
- 4.4 Table 1 lists the 10 IA Objectives that have been assessed against the Councils proposed policy change. To aid in transparency and consistency, the assessments were made using the decision-aiding questions that have been established for each IA Objective.

10 IA Objectives
1. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs and reduce disparity.
2. Promote equality of opportunity, improve health and wellbeing, and reduce levels of deprivation and disparity.
3. Improve the efficiency, competitiveness and adaptability of the local economy and help people gain access to satisfying work appropriate to their skills, potential and place of residence.
4. Improve the quality, range and accessibility of essential services, facilities, green infrastructure and open space.
5. Reduce contributions to climate change and localised air pollution and adapt and respond to the implications of a changing climate.
6. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity.
7. To conserve and protect land and soils, minimise the loss of agricultural land, whilst reducing land contamination.
8. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape, townscape and the historic environment.
9. Minimise the production of waste and encourage the recycling/reuse of onsite resources.
10. Limit water consumption to the capacity of natural processes and storage systems, ensure the sustainable reuse of water to accommodate growth and maintain and enhance water quality

Table 1: Breckland Local Plan Review IA Objectives

- 4.5 The potential impact of implementing the draft policy amendment over the short, medium and long term was considered. For each, an outcome was noted using the colours and symbols in Table 2.

Symbol	Definition
++	Major positive effect
+	Positive effect
n	Neutral effect
-	Minor negative effect
--	Major negative effect
u	Unknown at this stage

Table 2 Assessment scoring system

4.6 During the assessment, a number of factors were considered to determine whether a predicted effect has the potential to be significant. These factors are listed in Table 3 below with commentary provided in relation to these factors within the assessments, where relevant.

Issues for consideration	Details
Type of Effect	Positive or Negative Direct or Indirect Cumulative, secondary, synergistic Temporary or Permanent
Magnitude and Spatial Extent	Where will it impact? Will it be within the Breckland's boundary, outside it or both? Will it cause trans-boundary issues and impact on adjacent areas, or regionally or nationally? What is the geographical area and size of population likely to be affected?
Who it will affect, key groups or communities to be considered include	Old and young people Socio economic groups (variable) Women and men Asylum seekers and refugees Black and ethnic minority people (including Gypsy and Traveller communities) Disabled people Faith communities LGBT + people
Vulnerability of Receptor	Sensitivity of receptors Special natural characteristics/areas or cultural heritage Protected areas Relative importance of the site, whether it is a nationally or internationally important feature or of local significance
Timing and Duration of the Effect	Short-term: 0-4 years Medium-term: 5-9 years Long-term: 10+ years

Table 3: Factors considered in assessment

4.7 The assessment also considers opportunities to mitigate any negative effects or maximise opportunities for potentially positive effects. Crucially, the IA process considers whether there are any measures that could be taken to better support the principles of sustainable development or to mitigate any adverse impacts of any proposal.

DRAFT

5 Assessing Local Plan Objectives

5.3 This draft IA has not included an assessment of Local Plan Objectives as there are no proposed changes to the existing objectives of the adopted Breckland Local Plan. The amendments proposed to INF 03 is the only change proposed to the current Local Plan. The adopted objectives were subject to Sustainability Appraisal in preparation of the Breckland Local Plan 2019. Once new or amended objectives are proposed as part of the Full Update, would be an appropriate stage to assess the Councils Local plan objectives.

6 Integrated Assessment Outcomes

6.3 The full assessment for the proposed amendment to policy INF03 is set out at Appendix A. A summary of the outcome of that assessment is provided below. The summary also discusses the assessment of the only reasonable alternative approach. Identified as a “do nothing” approach where no amendment to INF 03 is made. This is in accordance with the SEA Directive that sets out assessment should consider alternatives where they exist.

6.4 Table 4 below provides a summary of the effect of the proposed amendment and the reasonable alternative considered to not amend Policy INF03.

Policy INF 03
<p>The policy amendment would remove the requirement to submit a partial review of four policies in the adopted Local Plan by November 2022, in favour of submission of a Full Update by 2026. Whilst this means the original intention of undertaking an early review will not be fulfilled, the amendment can ensure Local Plan policies regarding housing supply, gypsy and travellers and economic development, can continue to be deemed up to date and implemented accordingly. If policy INF 03 were not amended implementation of the existing policy wording of the policy would mean in addition to the four policies identified for early review (HOU 01, HOU 08, HOU 10 and EC 01) a range of policies including GEN 05 regarding town and settlement boundaries, HOU 02, HOU 03, HOU 04, HOU 05 would become out of date and the Council’s ability to effectively manage development would be reduced.</p>

Although policy INF 03 seeks to delay the review, this will be a more sustainable approach. Allowing the existing policy to remain unchanged and elements of the Local Plan become out of date would lead to potentially more significant negative effects upon the IA objectives

Table 4 The Councils Proposed Policy INF 03.

- 6.5 Objectives 5 to 10 remain neutral throughout the different time periods with no anticipated significant effects as a result of the proposed amendment.
- 6.6 The proposed amendment to INF 03 means the identified policies GEN 05, HOU 01, HOU 02, HOU 03, HOU 04, HOU 05, HOU 08, HOU 10 and EC 01 would be updated later than initially intended. As a consequence the issues that the early review was intended to address will not be subject to review for an additional four years. However, it is understood that various issues outside the control of the Council have meant the early partial review of the Local Plan, as proposed in the unamended INF03 could not have been undertaken or are not yet required. Given this, the effect of the amendment upon objectives 1 to 4, that are most directly related to the policies identified in INF03, is considered potentially negative in the short to medium term. However, the scale of any potential impact is such that the effects are not considered significant and therefore neutral overall.
- 6.7 The amendment commits to preparation of a Full Update for submission in 2026. This fuller review will allow for more up to date information to be considered in relation to the Local Plan as a whole and enable a fuller reassessment of key strategic issues. Whilst at this stage the potential effects of any proposals identified through the Full Update are unknown the process

laid out for review in amended INF03, provides an opportunity to establish a new policy approach that could have a positive effect upon the 10 IA objectives in the long term. The impact of the Partial Review that provides the opportunity for this, is therefore considered neutral over the long term. There are no identified mitigation measures that would enhance the potential positive effects of the proposed amendment to Policy INF03.

- 6.8 The outcome of an IA assessment is an important tool to understand the potential sustainability effects of proposed policies and proposals in a Local Plan. However, the IA itself cannot singularly determine what decisions should be taken to Local Plan preparation and review. The final strategy that is proposed should align with national policy and take full account of the relevant evidence and circumstances in which a proposed Local Plan or review is being prepared. It is also the case that public consultation will play a role in the eventual adoption of policies and allocation of sites.
- 6.9 The SEA Directive requires the consideration of the temporal nature of proposals. This is considered as part of the IA assessment at Appendix A. There is also the requirement for the consideration of the secondary, cumulative and synergistic effects of plans and their geographical effect. These are discussed below as part of an outline of the main outcomes of the IA assessments.
- 6.10 For this Partial Review of the Local Plan the amendment is limited to a single policy and has the effect of ensuring the existing Local Plan remains capable of being considered up to date. As such, there are no notable cumulative or synergistic effects. The geographical and secondary effects of the amendment are limited to sustaining an existing policy approach that has already been subject to sustainability appraisal as part of the preparation of the existing Local Plan.

7 Identifying Indicators to Monitor the Partial Review of the Local Plan

Introduction

- 7.3 The SEA Directive requires the significant environmental effects of implementing the plan or programme to be monitored in order to identify unforeseen adverse effects and to be able to undertake remedial action.
- 7.4 The significant effects indicators should be developed to ensure a robust assessment of policy implementation. The IA monitoring will cover significant social, economic and environmental effects.
- 7.5 Monitoring should assess whether:
- the assessment's predictions of sustainability effects are accurate;
 - the partial review of the Local Plan is contributing to the achievement of the desired SA objectives and targets;
 - if mitigation measures are performing as well as expected;
 - if there are any adverse effects and whether these are within acceptable limits or remedial action is desirable.
- 7.6 There is a need for integration between the monitoring report and IA, including indicators which enable a link to be established between implementation of the proposed amended policy to the Local Plan and the significant effects being monitored.
- 7.7 The responsibilities for carrying out the monitoring programme lie with the local planning authority. The Council already has a comprehensive monitoring framework and publishes a suite of Local Plan monitoring reports on an annual basis.
- 7.8 Local planning authorities are responsible for responding to any significant negative environmental effects of implementation of their plans. Similarly, local

planning authorities are responsible for identifying and responding to unforeseen adverse effects of the implementation of the plan, with help from the other bodies subject to the Duty to Co-operate.

Monitoring Framework

7.9 Given the limited nature of this Partial Review of the Breckland Local Plan it is considered that continued monitoring of the Breckland Local Plan through the existing monitoring framework would be most appropriate. The effect of the proposed amendment relates to the timeframe of delivery of a review to the Local Plan. The specific policies affected are already subject to an effective monitoring framework whilst Local Plan preparation itself is already monitored regularly through established processes.

7.10 As the Full Update of the Local Plan is progressed an up-to-date monitoring framework will be prepared. This will ensure a new framework is developed that is appropriate to the new IA indicators that have been identified and the emerging policy within that Full Update.

8 NEXT STEPS

8.3 The Partial Review of the Local Plan is being published for comments in summer 2022. This IA will be included as part of that consultation.

Representations received from the consultation will be used to inform further iterations of the Partial Review of the Local Plan for Breckland. Comments received directly in response to the Breckland Partial Review Local Plan IA would additionally be considered and incorporated, as appropriate for future assessments.

8.4 All further iterations of the proposed amendment, leading up to final adoption, will again be subject to the IA process.

DRAFT

9 Appendix A

Local Plan Policy – Amendment to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
1. Ensure all groups have access to affordable, decent and appropriate housing that meets their needs and reduce disparity.	N	N	N	<p>The proposed amendment will mean measures previously identified as required to address issues in meeting housing need will be progressed later than originally intended. This poses some risk that there is a delay in delivering the homes necessary to reduce disparity and increase access to affordable housing to different groups in the short and mid-term.</p> <p>Breckland's population is expected to grow and age, and the standard method for calculating housing needs remains higher than the Local Plan requirement. A delay in reviewing the policy approach risks not meeting the aims of IA objective 1. Given a Full Date is proposed by 2026, there is not expected to be a long term significant effect. Meanwhile, over the short to medium term, whilst current Local Plan policy is implemented the scale of any impact is unlikely to result in significant negative effects.</p> <p>Finally, review of the needs for non-travelling Gypsy and Travellers has been identified in INF03. This definition has been subject to legal challenge. At this time, the proposed amendment and the implications for Gypsy and Traveller provision is not considered to have a significant effect upon the IA objective.</p>	No mitigation or enhancement is considered possible given the limited nature of this partial review.

Local Plan Policy – Amendment to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
2. Promote equality of opportunity, improve health and wellbeing, and reduce levels of deprivation and disparity.	N	N	N	<p>The proposed amendment will mean measures previously identified as required to address issues in meeting housing need will be progressed later than originally intended. This poses some risk that there is a delay in delivering the homes necessary to reduce disparity and increase access to affordable housing to different groups in the short and mid-term.</p> <p>Consequently potential enhancements to residents' access to decent housing that could increase wellbeing , addressing deprivation and disparity may be delayed.</p> <p>Provision of optional technical standards requiring wheelchair accessible homes were identified as needed in preparation of the 2019 Local Plan but excluded as the Inspector considered identified thresholds and impact upon viability had not been justified. Delay to the review will mean introducing this requirement will also be delayed with subsequent implications for older people and those with disabilities. As the policy amendment indicates the Full Date would be implemented by 2026 and reflecting the relatively small scale nature of any impact over this time frame no significant effects are identified in relation to this IA objective.</p>	No mitigation or enhancement is considered possible given the limited nature of this partial review.

Local Plan Policy – Amendment to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
3. Improve the efficiency, competitiveness and adaptability of the local economy and help people gain access to satisfying work appropriate to their skills, potential and place of residence	N	N	N	There may be some implications in the delays to reviewing housing provision that risk negative impacts upon this policy but they are unlikely to be significant. The need for early review to ensure consideration of economic effects of the dualling of the A47 is not relevant as the improvements are yet to take place. Overall, it is therefore considered the proposed amendment would have no significant effect upon this IA objective.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
4. Improve the quality, range and accessibility of essential services, facilities, green infrastructure and open space	N	N	N	The proposed amendment would not have a direct effect upon this IA objective. However, the proposal would minimise risk of policies for the supply of homes becoming out of date, enabling the Local Plan to manage delivery in accessible, sustainable locations. Whilst this may avoid the potential negative effects of Local Plan policy becoming out of date, the overall effect upon this IA objective is considered neutral.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
5. Reduce contributions to climate change and localised air pollution and adapt and respond to the implications of a changing climate	N	N	N	The proposed amendment will not have a direct effect upon this IA objective. However, the proposed change would minimise risk of policies for the supply of homes becoming out of date, enabling the Local Plan to manage delivery in accessible, sustainable locations. Whilst this may avoid the potential negative effects of Local Plan policy becoming out of date, the overall effect upon this IA objective is considered neutral.	No mitigation or enhancement is considered possible given the limited nature of this partial review.

Local Plan Policy – Amendment to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
6. Protect, conserve, enhance and expand biodiversity and promote and conserve geodiversity	N	N	N	The proposed amendment will not have a direct effect upon this IA objective. However, the proposed change would minimise risk of policies for the supply of homes becoming out of date, enabling the Local Plan to manage delivery in accordance with the existing strategy and range of designated sites in Breckland. Whilst this may avoid the potential negative effects of Local Plan policy becoming out of date for features not protected through NPPF, the overall effect upon this IA objective is considered neutral.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
7. To conserve and protect land and soils, minimise the loss of agricultural land, whilst reducing land contamination	N	N	N	The proposed amendment will not have a direct effect upon this IA objective. However, the proposed change would minimise risk of policies for the supply of homes becoming out of date, enabling the Local Plan to manage delivery in accordance with the existing strategy. Whilst this may avoid the potential negative effects of Local Plan policy becoming out of date, the overall effect upon this IA objective is considered neutral.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
8. Maintain, enhance, and preserve the distinctiveness, diversity and quality of landscape, townscape and the historic environment	N	N	N	The proposed amendment will not have a direct effect upon this IA objective. However, the proposed change would minimise risk of policies for the supply of homes becoming out of date, enabling the Local Plan to manage delivery in accordance with the existing strategy. Whilst this may avoid the potential negative effects of Local Plan policy becoming out of date, the overall effect upon this IA objective is considered neutral.'	No mitigation or enhancement is considered possible given the limited nature of this partial review.
9. Minimise the production of waste and encourage the recycling/reuse of onsite resources	N	N	N	The proposed amendment will not have an effect upon this IA objective.	No mitigation or enhancement is considered possible given the limited nature of this partial review.

Local Plan Policy – Amendment to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
10. Limit water consumption to the capacity of natural processes and storage systems, ensure the sustainable reuse of water to accommodate growth and maintain and enhance water quality	N	N	N	The proposed amendment will not have an effect upon this IA objective.	No mitigation or enhancement is considered possible given the limited nature of this partial review.

Local Plan – Alternative strategy – “Do nothing” No change to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
1. Ensure all groups have access to affordable, decent, and appropriate housing that meets their needs and reduce disparity.	N	-	--	<p>Breckland’s population is growing, and aging. The district has notable gypsy and traveller need and relatively low resident based income. Not amending INF 03 would see policy regarding housing delivery, gypsy and travellers and economic development defined as “out of date” from November 2022.</p> <p>Making no change would consequently have a negative impact upon the Local Plan’s ability to direct and manage sustainable growth, leading to potentially negative effects upon this IA objective that would become more significant over the long term.</p>	No mitigation or enhancement is considered possible given the limited nature of this partial review.

Local Plan – Alternative strategy – “Do nothing” No change to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
2. Promote equality of opportunity, improve health and wellbeing, and reduce levels of deprivation and disparity.	N	-	--	Allowing Policy HOU 01 and HOU 8 to become out-of-date could undermine the effectiveness of the Local Plan’s strategy for housing delivery, including provision of affordable housing and would fail to provide a programme for review of HOU10 regarding technical housing standards. This would risk potentially negative effects upon this IA objective that would become more significant in the medium to long term.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
3. Improve the efficiency, competitiveness and adaptability of the local economy and help people gain access to satisfying work appropriate to their skills, potential and place of residence	N	-	--	If no amendments to the policy are undertaken the Local Plan policy for economic development would be deemed out-of-date. This would fundamentally undermine the Local Plan’s strategy for economic growth and have a potentially significant negative effect upon this IA Objective.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
4. Improve the quality, range and accessibility of essential services, facilities, green infrastructure, and open space	-	-	--	Should policy for the supply of homes, and gypsy and travellers be deemed out of date the ability to manage development to protect existing provision and ensure sufficient access to services and facilities exist could be weakened. This would have a potentially significant negative effect upon this IA objective.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
5. Reduce contributions to climate change and localised air pollution and adapt and respond to the implications of a changing climate	N	N	-	Should policy for the supply of homes, and gypsy and travellers be deemed out-of-date the ability to manage development to deliver sustainable development in accordance with the Local Plan could be undermined. This would have a potentially significant negative effect upon this IA objective.	9.3 No mitigation or enhancement is considered possible given the limited nature of this partial review.
6. Protect, conserve, enhance and expand biodiversity and promote and	N	N	-	Should policy for the supply of homes, and gypsy and travellers be deemed out-of-date the ability to manage development to deliver sustainable development	No mitigation or enhancement is considered possible given the limited

Local Plan – Alternative strategy – “Do nothing” No change to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
conserve geodiversity				in accordance with the Local Plan could be undermined. Whilst NPPF would continue to provide protection for features defined in the framework, over the long term this could have a potentially significant negative effect upon this IA objective.	nature of this partial review.
7. To conserve and protect land and soils, minimise the loss of agricultural land, whilst reducing land contamination	N	N	N	Should policy for the supply of homes, and gypsy and travellers be deemed out-of-date the ability to manage development to deliver sustainable development in accordance with the Local Plan could be undermined. Whilst NPPF would continue to provide protection for features defined in the framework, over the long term this could have a potentially significant negative effect upon this IA objective.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
8. Maintain, enhance and preserve the distinctiveness, diversity and quality of landscape, townscape and the historic environment	N	-	-	Should policy for the supply of homes, and gypsy and travellers be deemed out-of-date the ability to manage development in accordance with the Local Plan could be undermined. Over the long term this could have a potentially significant negative effect upon this IA objective.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
9. Minimise the production of waste and encourage the recycling/reuse of onsite resources	N	N	N	A do nothing strategy is not considered to have a direct effect upon this IA objective.	No mitigation or enhancement is considered possible given the limited nature of this partial review.
10. Limit water consumption to the capacity of natural processes and storage systems, ensure the sustainable reuse of water to accommodate growth and maintain and	N	N	N	A do nothing strategy is not considered to have a direct effect upon this IA objective	No mitigation or enhancement is considered possible given the limited nature of this partial review.

Local Plan – Alternative strategy – “Do nothing” No change to INF 03					
IA Objective	Short	Medium	Long	Supporting comments	Mitigation and enhancement
enhance water quality					

Appendix B Equality Impact Assessment

Contents

1	Introduction	27
2	The EqIA Policy Assessment	27

1 Introduction

This Equality Impact Assessment (EqIA) has been prepared as an Appendix to the Local Plan Partial Review Integrated Assessment. This specific EIA has been undertaken to help inform the assessment of Objective 2 of the IA. The EIA considers the potential effects of the proposed amendments to Policy INF 03 and where appropriate seeks to identify and make suggestions to lessen possible negative impacts on equalities that may arise.

Breckland District Council is required to undertake an EqIA of its policies, plans and strategies to ensure that they do not discriminate against any group or individual in the community.

EqIAs are required by law to include a range of equalities issues. To incorporate EqIAs into the plan-making process we also need to consider some of the wider issues of social inequality and deprivation.

The following equality areas are used in a matrix to determine whether policy INF 03 has potential implications in relation to the nine protected characteristics identified in the Equality Act 2010: Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex and Sexual Orientation. The matrix identifies where the policy is compatible and where there is potential or likely conflict with the equality areas. Additionally, the matrix shows how if policy INF 03 were to remain unchanged and policy of the Local Plan regarding supply of homes, gypsy and travellers and economic development of the Local Plan become out-of-date, how would this also impact upon these nine protected characteristics.

The EqIA Policy Assessment

The assessment seeks to identify the potential impact of the partial review on different equality target groups. The potential impact could be negative, positive or neutral.

- **Positive Impact (+)** means the proposal will have a positive effect on one or more equality groups or will improve equality relationships between groups. This positive impact may be differential, where the positive impact on one particular group of individuals is likely to be greater than on another.
- **Neutral Impact (o)** means that the proposal has no effect currently on equality groups.
- **Negative Impact (-)** means the proposal could disadvantage one or more equality groups. This negative impact may be differential, where the negative impact on one particular group of individuals is likely to be greater than on another.

The amendment to policy INF 03 identified within the partial review is considered to have a predominantly neutral impact upon the nine protected characteristics, with positive impacts upon the likes of race, disability and age group. However, if policy INF 03 were not amended policy regarding housing supply, gypsy and travellers and economic development would be deemed out of date. Our assessment is that the characteristics including race, disability and age would suffer negatively.

POLICY	ISSUES IN RELATION TO								
	Sex	Pregnant Women & Women on Maternity leave	Gender Reassignment	Marriage & Civil Partnership	Race	Disability	Age Group	Sexual Orientation	Religious/Faith Groups
Proposed amendment to INF 03	o	o	o	o	+	+	+	o	o
no change to INF 03 allowing policy regarding housing supply, gypsy and travellers and economic development to be deemed out of date.	o	o	o	o	-	-	-	o	o