



PELYNT PARISH NEIGHBOURHOOD
DEVELOPMENT PLAN
EQUALITIES IMPACT ASSESSMENT - STAGE TWO

AUGUST 2024

Pelynt Neighbourhood Plan Steering Group

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INTRODUCTION

1. The Equality Act 2010 (the Act) places a duty on all public authorities in the exercise of their functions to have regard to the need to eliminate discrimination, to advance equality of opportunity, and to foster good relations between persons with a “protected characteristic” and those without.
2. **Equality Impact Assessment.** Equality Impact Assessment (EQIA) is the systematic analysis of a policy or policies, primarily to identify the potential for an adverse impact on a particular group or community, in particular those with a protected characteristic. It is a method of assessing and recording the likely differential and/or adverse impact of a policy on people from different groups, so that if a policy results in unfairness or discrimination then changes to eliminate or lessen the impact can be considered. In June 2022 an EQIA Stage 1 Statement was adopted for the Pelynt Parish NDP.
3. The 'Protected characteristics' that are defined in the Act. For NDPs the relevant ‘Protected characteristics’ are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, sex, and sexual orientation. In Cornwall, socio-economic, rural isolation, and care-leaving are also considered to be characteristics that are relevant.
4. **Aims of the EQIA.** The purpose of the Pelynt Parish Neighbourhood Development Plan is to improve the quality of life for people living and working now and in the future in the Pelynt Parish from an environmental, social and economic point of view. The aims and policies in the Pelynt Parish Neighbourhood Development Plan have emerged in response to local people’s views and in the light of evidence gathered for the Parish to meet the needs expressed and address the issues identified. To confirm that the Pelynt Parish Neighbourhood Development Plan does not have any unintended consequences for particular groups the vision, objectives and policies in the Pelynt Parish Neighbourhood Development Plan must be scrutinised to ensure that they do not disadvantage any vulnerable groups. The focus is mainly on ‘indirect discrimination’ which can occur when a policy applies to everyone but disadvantages a person with a particular protected characteristic.

METHODOLOGY

5. An assessment has been made as to whether the Pelynt Parish NDP is expected to have a positive, negative, or neutral impact on each of the protected characteristics. A brief exposition of the Policies and notes on any mitigation has been provided.
6. The impact of the Policies has been assessed taking into account the baseline information about the population of Pelynt Parish Parish. If the impact is negative, this has been given a high, medium or low assessment. The impact of the Policies has been based on the current situation (i.e. disregarding any actions planned to be carried out in future).
 - High impact - a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

- Medium impact - some potential impact exists, some mitigating measures are in place, poor evidence.
 - Low impact - almost no relevancy to the process, e.g. an area that is very much legislation-led.
7. Where there is a potential positive impact, in that the outcome of the policies will be likely to be of benefit to the interest of groups with protected characteristics, this is also indicated.
 8. Where there is a negative impact, any necessary mitigation is identified.

SUMMARY DATA

9. Baseline demographic information relating to the 9 Protected Characteristics specified in the 2010 Equalities Act and the 3 local Protected Characteristics is given in the Stage 1 EQIA. That document concluded that the baseline data suggests that Pelynt Parish is the home of many people who may fall into one or more of the Protected Characteristics, and in some cases, there are proportionally more of them than is typical in Cornwall and England. There is also the potential for any discriminatory impacts to be more extensive and intensive through the effect of the higher levels of deprivation and rural isolation present.
10. The Stage 1 EQIA concluded that the NDP may include policies for new housing, employment areas, retail, leisure and entertainment, which whilst benefiting the community at large may be perceived to be against interest of particular individuals (e.g. people whose immediate living environment may be affected).
11. In the NDP process, it is possible that some residents, such as young people, or those suffering from ill-health and persons with disabilities, or those living in more isolated locations, may be less engaged and their 'voice' dis-proportionately muted in comparison to other groups, to their disadvantage. Policies intended to be applied generally may have unanticipated impacts on people in protected characteristics. Also, it is possible that some resultant developments are not as accessible as may be possible if not effectually influenced/controlled (for example the creation of environments that are wheelchair unfriendly).
12. It is also a risk that inappropriate language may be used in community based engagement processes.

COMMUNICATIONS AND ENGAGEMENT STRATEGY

13. In its approach to community engagement the Steering Group considered the nature and demographics of the Parish (as above), noting that some small communities could be hidden in the largely homogenous wider community, and prepared methods that took account of the diversity of the whole community, so all members of the community inform the plan. The team worked hard to design engagement activities that were as fully inclusive as possible, such as displays at the key community location [Village Hall] with reasonably good venue accessibility for everyone, at timings that suited those in work, or with families at home, and a variety of communication methods to reach

as wide an audience as possible, including a dedicated website, Facebook social media, local press, posters, flyers, an online engagement platform and door-to-door summary leaflets, and letters to organisations representing particular groups.

STAGE TWO EQUALITY IMPACT ASSESSMENT

14. **The Plan Vision.** A vision for Pelynt Parish for 2030 was developed through community engagement:

‘Our vision for the parish is to create a healthy, well-designed, and well-connected community that is a pleasant and tranquil place to live, work and visit for people of all ages and abilities. We aim to meet the needs and aspirations of residents by providing a diverse range of homes, jobs and community facilities. Our parish will be set in a beautiful environment that values its heritage, landscape and biodiversity. We are committed to addressing the causes of climate change and enhancing our resilience through sustainable practices and adaptive measures, ensuring a vibrant and sustainable future for all’.

15. It is considered that the vision is inclusive of all those falling within one of the protected characteristics, expressly referring to people of all ages and abilities, and the assessment is that that they will gain an overall positive impact from the Pelynt Parish Neighbourhood Development Plan.

16. **The Plan Objectives.** The Objectives of the Pelynt Parish NDP are as follows:

Climate Change Objectives

- a. *Support local actions to tackle the causes and effects of climate change*
- b. *Encourage new development to incorporate on site provision of renewable energy, low energy and low carbon technologies.*
- c. *Encourage public transport facilities and non-motorised parish travel with safer walking routes within the village and parish.*

Housing Objectives

- a. *Provide for an appropriate amount of new housing to meet local needs and local demand, in a mix that includes good quality locally distinctive homes for elderly villagers, young singles, couples and families needing their first home.*
- b. *Contribute to the housing and employment needs of the Looe-Liskeard Community Network Area.*

Business & Jobs Objectives

- a. *Support, strengthen and diversify the wider local economy and local businesses, particularly in agriculture, tourism, leisure and light industry at a scale appropriate to the area.*
- b. *Support opportunities for local people to access local employment.*

c. Encourage improvement of digital connectivity.

Environment & Heritage Objectives

a. Retain and enhance the highly valued natural environment, habitat and landscape of the Parish.

b. Protect and enhance the architectural and historic character of the area.

c. Improve the quality of design of all development and change within the plan area.

Community Facilities & Infrastructure Objectives

a. Ensure that community facilities, open space and recreation provision, and infrastructure are retained, enhanced and/or improved to meet the changing needs of all parts of the local community.

b. Ensure new development is appropriate in scale to the ability of infrastructure to support it.

c. Support measures to deliver healthcare locally where possible and meet the needs of elderly people for suitable housing.

d. Maintain and enhance the health and wellbeing of the community through development.

17. These objectives are very broad in their phrasing and can be considered to be inclusive. Any negative impacts are addressed in the policies that follow from the objectives.

18. **Summary of Policies.** Flowing from these objectives are the policies of the NDP:

Climate Change

Policy CC 1 Sustainable Design and Low Carbon Heat

Policy CC 2 - Local Energy Storage

Policy CC 3 Community Led Renewable Energy

Policy CC 4 Wind Energy

Policy CC 5 Ground Mounted Solar PV

Policy CC 6 - Sustainable Drainage

Policy CC 7 - Natural Flood Management Solutions

Housing

Policy H 1 – New Housing Development at Pelynt Village

Policy H 2 – New Housing Development in the Countryside

Policy H 3 – Housing Mix

Policy H 4 - Community Led, Self and Custom Build Housing

Business & Jobs

Policy BE 1 - Small Business Development

Policy BE 2 - Supporting Home Based Businesses and Working from Home

Policy BE 3 - Farm Business Diversification

Policy BE 4 - Rural Tourism

Natural Environment

Policy NE 1- Landscape

Policy NE 2 - Biodiversity

Policy NE 3 - Trees, Cornish Hedges and Hedgerows

Policy NE 4 - Dark Skies

Design & Heritage

Policy DH 1 - Design Principles

Policy DH 2 – Heritage, Design & Cornish Distinctiveness

Community Facilities & Infrastructure

Policy CF 1 – Protection and Enhancement of Community Facilities

Policy CF 2 – Education and Health Provision

Policy CF 3 - Protection and Enhancement of Open Space and Recreation

Policy CF 4 – Transport, Highways and Communications

Policy CF 5 - Footways, Pedestrian Links, Public Rights of Way

19. The following tables assess the impact of the Pelynt Parish NDP objective and policy set on groups with protected characteristics.

Theme: CLIMATE CHANGE						
Protected characteristic	Assessed Impact					Comments and Mitigation
	Positive	Neutral	Negative Low	Negative Med	Negative High	
						Policy CC 1 Sustainable Design and Low Carbon Heat and Policy CC 2 - Local Energy Storage will help to address the social impacts of climate change and may help address energy poverty in the area. Policy CC 3 Community Led Renewable

Age	✓					Energy may also bring reduced energy prices and greater prosperity, and promote community inclusiveness.
Disability	✓					
Gender reassignment	✓					
Marriage and civil partnership	✓					
Pregnancy and maternity	✓					
Race	✓					
Religion and Belief	✓					
Sex	✓					
Sexual orientation	✓					
Socioeconomic	✓					
Rural Isolation	✓					Policy CC 4 Wind Energy and Policy CC 5 Ground Mounted Solar PV will contribute to the reduction in greenhouse gas emissions and indirectly help reduce local impacts of climate change such as heat related illnesses, skin cancer, cataracts, storms and flooding, all of which may have a proportionately greater impact on vulnerable groups.
Care-leaving experience	✓					
Policy CC 6 - Sustainable Drainage and Policy CC 7 - Natural Flood Management Solutions will help to manage increased risks of flooding and pollution, reducing risks to human health and property which may have a proportionately greater impact on vulnerable groups.						
MITIGATIONS INTRODUCED: NON NECESSARY						

Theme: HOUSING						
Protected characteristic	Assessed Impact					Comments and Mitigation
	Positive	Neutral	Negative Low	Negative Med	Negative High	
						Policies here and in other themes include criteria for new housing development which will help to achieve sustainable, inclusive, accessible and safe neighbourhoods that meet the needs of a wide cross-section of the community. However, provision without regard to the protected characteristics would not be acceptable.
Age	✓					Specific reference is made in Policy H3 to the need for a mix of formats, sizes and tenures of dwellings to ensure a range of housing choices are available to meet the identified housing needs in the Parish, including a mix of smaller one and two bedroom homes for the young and elderly in the form of social/affordable rented and low cost home ownership, homes that provide enhanced opportunities to 'work from home' [which may also enable people with reduced mobility to stay economically active] and dwellings designed to meet special needs such as fully accessible or extra care units suitable or readily adaptable for disabled or elderly people, on parts of the site with generally level access and close to community facilities. Provision of affordable housing is emphasized.
Disability	✓					
Gender reassignment	✓					
Marriage and civil partnership	✓					
Pregnancy and maternity	✓					
Race	✓					
Religion and Belief	✓					
Sex	✓					
Sexual orientation	✓					
Socioeconomic	✓					

Rural Isolation	✓					<p>Policy H3 also requires that developers assess current demographic, housing need and market information to determine the proportional balance of dwelling size, type and tenure required.</p> <p>Policies H1 and H2 seek to ensure that most new housing will occur in sustainable locations where services are most accessible, which will help to ensure that people with protected characteristics are better able to live near to supporting service.</p> <p>Referring to infill in hamlets Policy H2 of the NDP requires that the proximity, accessibility and relationship of the hamlet / small group of dwellings to facilities, employment and services required for day-to-day living will be a consideration.</p> <p>Policy H4 encourages community action on housing, which will help to focus on local needs, including those in vulnerable groups, and has potential to increase inclusivity.</p> <p>Therefore, the impact of these policies on the interest of groups with protected characteristics may be expected to be positive, including a better supply of suitable dwellings, designs better suited to needs, improved integration and accessibility.</p> <p>MITIGATIONS INTRODUCED: NON NECESSARY</p>
Care-leaving experience		✓				

Theme: BUSINESS AND EMPLOYMENT						
Protected characteristic	Assessed Impact					Comments and Mitigation
	Positive	Neutral	Negative Low	Negative Med	Negative High	
Age	✓					<p>Overall these policies, which in general will help improve prosperity, should indirectly support groups with protected characteristics by safeguarding and providing additional or enhanced work opportunities, improving general access to employment locations, and encouraging a better environment at existing employment sites.</p> <p>A specific requirement of Policy BE1 is that new employment site proposals should be physically well-related to existing settlements, or if not, they exploit opportunities to make the location more sustainable by improving the scope for</p>
Disability	✓					
Gender reassignment	✓					

Marriage and civil partnership	✓					<p>access on foot, by cycling or by public transport, and do not create road hazards. These will all help to avoid discriminating against people with financial constraints on transport, or mobility restrictions.</p> <p>Policy BE2 gives support for working from home and home-based business which may help those with limited mobility.</p> <p>The approach to farm business diversification and rural tourism in Policies BE3 and BE4 includes the securing of multiple wider public benefits such as employment and enterprise opportunities, sustainable access, social and cultural facilities. Policy BE4 also specifically asks that new tourism facilities be physically accessible to people with impaired mobility and other impairments such as poor sight or hearing, and socially inclusive facilitating use by all sectors of the tourist and local community.</p> <p>MITIGATIONS INTRODUCED: NONE NECESSARY</p>
Pregnancy and maternity	✓					
Race	✓					
Religion and Belief	✓					
Sex	✓					
Sexual orientation	✓					
Socioeconomic	✓					
Rural Isolation	✓					
Care-leaving experience	✓					

Theme: NATURAL ENVIRONMENT						
Protected characteristic	Assessed Impact					Comments and Mitigation
	Positive	Neutral	Negative Low	Negative Med	Negative High	
						Overall Policies NE1 to NE4 will help to retain the distinctive natural, environment qualities that contribute to the locally valued ‘sense of place’ and thereby to both physical mental well-being. Policy NE4 on Dark Skies may help in promoting improved sleep patterns and reducing stress, both important to the protected characteristics.
Age	✓			x		<p>However, development measures to retain local biodiversity and landscape assets such as the retention of Cornish Hedges, stiles or traditional surface treatments, may also impact on older people, those with a disability etc., and therefore mitigations are necessary.</p> <p>MITIGATIONS INTRODUCED: SEE POLICY DH2, CF4, CF5</p> <p>The NDP now includes a note supporting Policy DH 2 – Heritage, Design & Cornish Distinctiveness’ and Policy CF 4 – Transport, Highways and Communications</p>
Disability	✓			x		
Gender reassignment		○				
Marriage and civil partnership		○				
Pregnancy and maternity				x		
Race		○				
Religion and Belief		○				
Sex		○				
Sexual orientation		○				

Socioeconomic		○				to the effect that in applying these policies users should be aware of and carefully take into account the needs of groups with special characteristics as set out in the Equalities Act 2010.
Rural Isolation		○				
Care-leaving experience		○				
		○				Policy CF5 on public footways, pedestrian links, and Public Rights of Way now requires that development should seek to connect to link where possible to permissive routes and that where practicable, routes should be accessible to all, including people with disabilities, applying the principle of 'Least Restrictive Access'. It applies the same principle where public footways, pedestrian links, and Public Rights of Way are routed or realigned through new development.

Theme: DESIGN AND HERITAGE						
Protected characteristic	Assessed Impact					Comments and Mitigation
	Positive	Neutral	Negative Low	Negative Med	Negative High	
Age				x		Overall Policies Policy DH 1 includes criteria that will help to ensure that new developments function well and will thereby be of benefit to those falling into the protected characteristics, for example, by incorporates design features that minimise the fear and opportunities for crime and anti-social behaviour, maintaining and improving the permeability and safety of pedestrian routes, having adequate road width to the frontage of the development to ensure that footways, pavements, entrances and driveways do not get blocked or obstructed and that delivery and emergency vehicles may pass, provision of garden space able to encourage recreation and physical activity for all ages. Policy DH 2 – Heritage, Design & Cornish Distinctiveness will help to retain the distinctive built environment qualities that contribute to the locally valued 'sense of place' and thereby to both physical mental well-being and are also part of the rural charm that supports the tourism business, a source of local prosperity and some services. However, similarly to the above in the natural environment theme, development measures to retain local historic environment assets such as the retention of Cornish Hedges, traditional surface treatments, restricted or uneven entrance ways etc, may also impact on older people, those with a disability etc., and therefore mitigations are necessary.
Disability				x		
Gender reassignment		○				
Marriage and civil partnership		○				
Pregnancy and maternity				x		
Race		○				
Religion and Belief				x		
Sex		○				
Sexual orientation		○				

						<p>MITIGATIONS INTRODUCED: SEE POLICY DH1, DH2, CF4.</p> <p>Reference is now made in Policy DH 1 - Design Principles to 'Building for a Healthy Life' by Homes England Building for a Healthy Life (BHL) is the new (2020) name for Building for Life, the government endorsed industry standard for well-designed homes and neighbourhoods. The BHL toolkit sets out principles to help guide discussions on planning applications and to help local planning authorities to assess the quality of proposed (and completed) developments but can also provide useful prompts and questions for planning applicants to consider during the different stages of the design process.</p> <p>The NDP now includes a note supporting Policy DH 2 – Heritage, Design & Cornish Distinctiveness' and Policy CF 4 – Transport, Highways and Communications to the effect that in applying these policies users should be aware of and carefully take into account the needs of groups with special characteristics as set out in the Equalities Act 2010.</p>
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Theme: COMMUNITY FACILITIES						
Protected characteristic	Assessed Impact					Comments and Mitigation
	Positive	Neutral	Negative Low	Negative Med	Negative High	
Age	✓					<p>Overall it can be anticipated that these policies will indirectly support groups with protected characteristics by providing support for retention and enhancement of social, educational, recreational and medical facilities.</p> <p>Policy CF1 Protection and Enhancement of Community Facilities also seeks a well-designed public realm which will respond to access needs and encourages the incorporation in new developments of opportunities for informal gatherings in a safe and clean environment, which will aid inclusiveness for those in protected characteristics.</p> <p>Policy CF 3 - Protection and Enhancement of Open Space and Recreation, by encouraging the retention, enhancement and extension of the provision of green spaces, recreation and sports facilities, will contribute opportunities to improve both physical and mental health and well-being.</p> <p>The needs of those with protected characteristics are an element covered by Policy Policy CF 4 – Transport, Highways and Communications and Policy CF 5 -</p>
Disability	✓					
Gender reassignment	✓					
Marriage and civil partnership	✓					
Pregnancy and maternity	✓					
Race	✓					
Religion and Belief	✓					
Sex	✓					
Sexual orientation	✓					

Socioeconomic	✓					Footways, Pedestrian Links, Public Rights of Way which seeks to ensure that development of services and facilities takes place alongside any future development.
Rural Isolation	✓					
Care-leaving experience	✓					

CONCLUSION

20. The assessment of the vision, objectives and policies contained in the Pelynt Parish Parish NDP indicates that, after mitigations are included, none of them will have high negative impacts upon groups with protected characteristics, with most being medium or low impact, and capable of mitigation (which has been included in the NDP). Many of the policies will make a positive contribution to the needs of those in the community with protected characteristics.

ENDS