

Councils Response to Inspectors Initial Questions Friday 24th May 2019

7. Question 7

Have any concerns been expressed about the Equality assessment?

- 7.1. The SA Framework has addressed equality issues since the start of the Local Plan process in 2006.
- 7.2. The Sustainability Appraisal Framework contains the following objective and sub-objectives which can be found in the Sustainability Appraisal Report Appendix C:

'14. Promote equity & address social exclusion by closing the gap between the poorest communities and the rest'

To include measures which will improve everyone's access to high quality health, education, recreation, community facilities and public transport
To ensure facilities and services are accessible by people with disabilities and minority groups
To encourage people to access the learning and skills they need for high quality of life
To ensure that the Local Plan does not discriminate on the basis of disability, ethnic minority, or gender

Regulation 18 and Regulation 19 Responses

- 7.3. Some detailed comments were raised in relation to equity themes as set out in SA Objective 14 sub-objectives (see above) at Regulation 19 and Regulation 18 stages. The following extracts identify some key issues raised by respondents which link to the equity themes. The comments & views together with SADC reply are set out below.

Regulation 18 Stage in 2018

- 7.4. No specific equality concerns raised.

Regulation 19 Stage 2018

- 7.5. A small number of issues/comments/concerns were raised that relate to equality.

L22 - Community Leisure and Sports Facilities

There is a need for new purpose built mosque.	1185960	Noted	Policy L22 acknowledges that there is a deficit of worship space and sets out an appropriate approach to provision.
Not enough thought has gone into providing for the social and pastoral needs of the people who will live in the proposed developments. The provision of a Community Hall or Multi-Faith Centre should also be included in any development.	St Albans Deanery Synod (1185929)	Noted	Policy L22 acknowledges that there is a deficit of worship space and sets out an appropriate approach to provision

L23 Urban Design and Layout of New Development

No evidence underpinning the need for M4 (2) dwellings (accessible and adaptable)	Martin Grant Homes and Kearns Land (975683) Thakeham Homes (1187005) Home Builders Federation (1156936)	Disagree	SHMA evidence (and forthcoming SW Herts update) indicates changing demographics and increasing numbers of older persons aged 85 and over. New homes should be designed in a flexible way to ensure that housing is accessible and adaptable, maximising ability to remain in homes and/or provide for people with a disability. This presents a clear case for all housing to meet an accessible standard. This policy would positively impact on equality of opportunity.
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L28 Green Space Standards and New Green Space Provision

Policy should clarify what is meant by 'teenage areas' within tables	Hertfordshire County Council (837689)	Disagree	'Teenage areas' is a term derived from PPS 17 typology of green spaces. SADC Green Spaces Technical Report 2016 defines this as areas for wheeled sports and pieces of equipment within existing parks. Multi-games courts and youth shelters are taken into consideration. The NPPF does not define a typology for this form of open space however in terms of equality and inclusion it is important that the local plan caters for all the community.
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Policy S6 vii) North East Harpenden Broad Location

Policy S6 viii) North West Harpenden Broad Location

Should be more housing provided for elderly and disabled people	Harpenden Society (1156761)	Disagree	Housing for the elderly, including downsizers is a key part of the LP. There are clear standards in Policy L1 and L2.
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7.6. The plan is considered to comply with the Equality Act 2010. This is further evidenced by the **Equalities Impact Assessment (CD 026)**, submitted to the Inspectorate on Friday 26th April 2019.

7.7. The file can also be accessed electronically on the following link:

https://www.stalbans.gov.uk/Images/CD%20026%20Equalities%20Impact%20Assessment%20%20April%202019_tcm15-67180.pdf