



**WATFORD
BOROUGH
COUNCIL**

Equality Impact Analysis

Title of policy, function or service	Final Draft Watford Local Plan – Regulation 19 Consultation.
Lead officer	Jack Green
Person completing the EIA	Vicky Hughes
Type of policy, function or service:	Existing (reviewed) <input type="checkbox"/> New/Proposed <input checked="" type="checkbox"/>
Version & Date	V1 28 October 2020

1. Background

Every Local Planning Authority (LPA) is required to have a Local Plan under the [Planning and Compulsory Purchase Act 2004](#).¹

Watford's current development plan consists of the Watford District Plan (2003) and the Core Strategy (2013). As development plans need to be reviewed every five years and government housing targets have since increased, the current Plan is considered out of date. Therefore, the council has prepared a new draft Local Plan.

The new draft Local Plan sets out a vision for how Watford will grow over the next sixteen years. It will be used to guide future planning decisions. The Plan contains site allocations, as well as Development Management and strategic policies.

2. Focus of the Equality Impact Analysis

This EIA, therefore, considers the potential equality related impacts, both positive and negative of the Local Plan on the people in the groups or with the characteristics protected in the Equalities Act 2010.

These are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership.

3. Engagement and consultation

The Plan is subject to certain stages of consultation, as per the Town and Country **Planning (Local Planning) Regulations 2012**.

An Issues and Options consultation (Regulation 18) was held between September and October 2018, which aimed to gather views and suggestions from the community about how new development should take place in the future. Following this, a Preferred Options consultation (Regulation 18) was held between September and November 2019. A full first draft of the Local Plan was consulted on. This feedback, alongside other evidence studies, has informed the preparation of the Local Plan. The

¹ <https://www.legislation.gov.uk/ukpga/2004/5/part/3/crossheading/development-plan>

final draft of the Local Plan will be further consulted on in January 2021 with representations required on the soundness of the Plan. Further participation will be possible during the examination process.

A variety of consultation methods has been used to engage Watford’s diverse community. This has included social media posts, Youtube videos including an animation and voxpops, leaflets, exhibitions events, newspaper articles, press releases, interviews on local radio, posters around town and putting the documents for viewing in the town hall and nearby libraries.

4. What we know about the Watford population

Population

The current population of Watford is 96,600 (ONS mid-2019 estimate). This was slightly less than estimated in 2018 (96,800 rounded). The slowing of population growth across the UK (marked by a fall in Watford) is attributed to the lowest number of births for 14 years alongside an increase in emigration and a fall in international immigration.

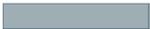
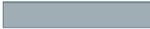
Watford’s population is currently projected to increase to 105,000 by 2025 and 110,300 by 2035, a rise from 2016 of 14.2%. This growth will be a challenge for Watford, given our tight borough boundaries and is recognised within the Council Plan, shaping a number of our commitments and areas for action in the Delivery Plan.

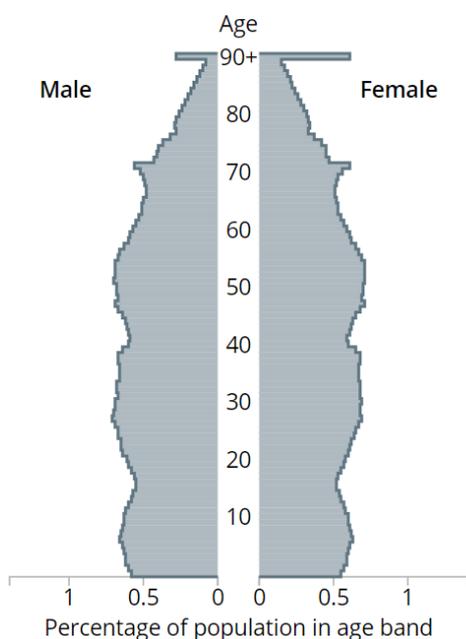
The graphs below show a comparison between the sex and age profile of England’s population with that of Watford. (ONS 2018).

ENGLAND

55,977,178 people in 2018

All ages

27,667,942 males 49.4% 
28,309,236 females 50.6% 

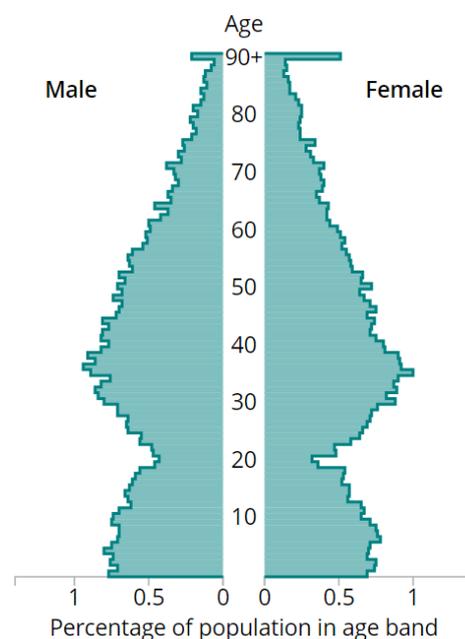


WATFORD

96,767 people in 2018

All ages

48,011 males 49.6% 
48,756 females 50.4% 



Overall, this comparison shows that Watford is a relatively young town. This is particularly the case in the 0 to 19 age range where 26.5% of the population are between those ages, compared with 23.6% nationally. Similarly the 30 to 49 cohort accounts for a significantly higher proportion of the Watford population at 32.1%, compared to 26.1% nationally. This means that we are a town which is popular with families and, whilst we are a town for all, we recognise that our plans need to reflect our large number of young people and families.

Population density

The population density for Watford is circa 4,600 people per square kilometre. This makes it the most densely populated district area in Hertfordshire and in the country (432 per square kilometre). This is a reflection that we are an urban district, with many characteristics of a metropolitan borough. In comparison with many metropolitan boroughs, particularly those in and around the outskirts of London, our density is relatively low.

Ward level populations (mid-year 2018 estimates)

The ONS publishes experimental data on ward level populations. The last release date was for mid-year 2018. This showed Central ward had the highest population (9,447) and Tudor the lowest (6,825). Further analysis shows that Nascot ward had a significantly higher number of elderly residents than other wards in Watford, whilst Central a significantly higher number of under 20s. The age profile of Nascot ward was recently highlighted by the COVID-19 crisis, when it experienced the highest death rate of any ward in Watford.

Ward	Mid-year 2018
Callowland	7,928
Central	9,447
Holywell	8,610
Leggatts	7,757
Meriden	7,972
Nascot	8,815

Ward	Mid-year 2018
Oxhey	6,847
Park	8,698
Stanborough	7,403
Tudor	6,825
Vicarage	8,854
Woodside	7,611

ONS experimental data (Ward Level Mid-Year Population Estimates (experimental), Mid-2018)

Households

Number of households

The ONS data, based on the census, says that there were 36,681 households in Watford at the time of the Census; as of 31 May 2020 the figure was 40,275 (council tax base).

The average household size in Watford is currently 2.45. This is currently average for the region. Nationally, there is downward trend in household size projected over the next 20 years. The Watford average household size is envisaged to drop to 2.33 person household in 2039, which this is larger than that projected for the English average (2.21 in 2039) and the Hertfordshire average (2.29 in

2039). These projections have implications for Watford in terms of development and growth.

Household size

The 2014 projections estimate that, between 2014 and 2039:

- Watford's average household size will decrease from 2.45 to 2.33
- Hertfordshire's average household size will decrease from 2.42 to 2.29
- England's average household size will decrease from 2.35 to 2.21

Household Composition

From the 2016 projections, one person households see the biggest increase in household growth in Watford, representing 44% of the total household growth.

However, households with dependent children see the next biggest rise, with 35% of household growth; couples with other adults make up 9%; other (multi-person adult) households make up 7% and couple households (without children or other adults) make up the remaining 6% of all estimated growth.

Ethnicity

Watford has a very diverse population, more so than the rest of Hertfordshire; it is one of the strengths of our town and what makes us such a vibrant and diverse town.

For Watford, the Census 2011 shows the following main breakdown in terms of ethnicity: White British (61.9%), White other (7.7%), Pakistani (6.7%), British Indian (5.5%), British other Asian (4.4%) and African (3.5%), White Irish (2.3%) and Caribbean (1.7%).

The full breakdown from Census 2011 is at Appendix A.

In 2016, the ONS published population estimates by ethnicity. This did not report ethnicities to the level of granularity that the Census reported ethnicity. The estimates for 2016 were: White British (59% - 57,000 residents), Asian / Asian British (19% - 19,000 residents), All Other White (12% - 12,000 residents), Black / African / Caribbean / Black British (4% - 4,000 residents), Mixed / Multiple Ethnic Group (4% - 4,000 residents) and Other Ethnic Group (1% - 1,000 residents).

National insurance registration: Census information is now nearly 10 years old and it is likely that the ethnic profile of the borough has changed during this time. For example, it would not have captured the more recent EU arrivals to the borough (EU2 countries – Romania and Bulgaria, who were given residency rights in 2014). We know from other data such as National Insurance Registration that Watford has experienced a relatively high increase in nationals from the EU2 countries applying for National Insurance registrations as Watford residents. This follows a period of a high number from EU8 countries (including Poland, Latvia, Lithuania) who were given freedom of movement to the UK from 2004. Throughout the period the arrival of new residents from south Asia (e.g. Pakistan / India) has remained relatively constant.

The National Insurance Registrations for January – March 2020 shows there were 2,194 registrations in Watford, of which 640 were from Romania and Bulgaria, 527 from South Asia and 395 from Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden. 148 came from sub-Saharan Africa and 30 from North Africa. The most recent breakdown (March 2020) is at Appendix B.

Language spoken at home: Other data sources, including school language survey on the languages spoken by Watford school children at home, endorse the National Insurance findings that Watford remains a town with a diverse community with English still the predominant language (at around

60%) followed by (in order of self-selection by Watford families): Urdu, Polish, Tamil, Romanian, Gujarati, Pahari, Gujarati and Hindi. The most selected African language spoken is Arabic (113 families – although not spoken exclusively in Africa) and Akan/Twi-Fante (78 families).

The full breakdown for 2018 is at Appendix C.

Births and origin of parents: In 2018, nearly 60% (59.6%) of children born to Watford based parents, had one or both parents born outside of the UK, with 42% having both parents born outside of the UK. 52% of new mothers in Watford were born outside of the UK (1397 births in total, with 667 to mothers born in the UK and 730 born outside of the UK. Of these 257 mothers were born in the ‘new’ EU countries – those that had joined since 2004) and 252 in the Middle East and Asia. 88 mothers were born in Africa.

EU Settlement Scheme (EUSS) quarterly statistics (28 August 2018 to 31 March 2020) –

experimental data: In May 2020, the Government issued data on the number of applications made to the EUSS from 28 August 2018 to 31 March 2020, and applications concluded during the same time period. This shows that up to March 2020, 11,630 people in Watford had applied for EUSS. Of these the following were the highest number of nationalities who had applied: Romanian (3,530), Polish (1,810), Portuguese (1,020) and Bulgarian (580).

The full analysis is at Appendix D.

Age

The largest populations by age band in Watford are:

- 35-39 years (8,537)
- 30-34 years (7,921)
- 40 -44 years (7,458)
- 5 -9 years (7,027)

Compared with other districts in Hertfordshire, Watford has fewer 65+ years residents. The age profile of the borough is more comparable with cities who have younger age profiles and where younger people are attracted by lifestyle opportunities, affordable housing and good transport links.

Median age: the median age in Watford is 37 years. This compares to 40 for England (mid-year 2019 population estimates)

Disability / Health

Around 85% of the population of Watford state that they have ‘good health’ and just under 14% record a disability. We do not have details as to what these disabilities are but they will include a wide range of physical and mental health disabilities or impairment (Census 2011). The 2019 NHS Health Profile’s summary conclusion is that the health of people in Watford is ‘varied’ compared with the England average. About 12% (2,300) of children live in low income families – this is an improvement on 2016 (14% / 2,700). Life expectancy for men at 65 is similar to the England average but for women it is significantly worse (2016-18). The profile also shows that Watford is below average for a number of important health indicators, which may have had some impact on the town’s rate of deaths from COVID-19. These include: residents eating the recommended 5 a day portions of fruit and vegetables, over-18s who are obese and physically active adults. All reported

cancer screenings were below average for Watford and emergency admissions for falls from the age of 65 plus were worse than for the England average.

Religion / belief

The religious breakdown in the Census 2011 of the main religions in Watford was: Christian (54.1%), Muslim (9.8%), Hindu (4.8%), with no religion stated at 21.4%.

In 2016, the ONS published population estimates by religion. This took an estimated population of 94,000 for Watford and the main religions identified through the estimates were: Christian (53%), Muslim (10%), Hindu (9%) with no religion at 26%.

Sexual orientation / Transgender

Watford has no specific data on the transgender community within the borough or for the sexual orientation of its community. It is anticipated that these questions will be asked in the Census 2021.

Education and skills

A skilled workforce supports the economic development and employment aspirations for Watford. There has been a mostly increasing trend in educational attainment in Watford over the last few years. Watford's working age population has the fourth highest percentage (44.4%) in Hertfordshire of those with qualifications at NVQ 4 and above (Three Rivers is the highest with 63.5%, St Albans the second highest at 58.5% and East Herts third highest with 45.7%); this is close to the Hertfordshire average of 42% average but higher than the Great Britain average of 40.3%.

83.7% of Watford residents have achieved 5 A*-C or equivalent. This is the better than the England average of 75.6 (Jan – Dec 2019)

Homelessness

Whilst this is not a protected characteristic under the Equality Act 2010, the council recognises that the particular circumstances of people without their own home might be a factor in their taking an active role in our community. We currently have 17 statutory homeless (September 2020) and 97 households in temporary accommodation (March 2020).

Deprivation

The English Indices of Deprivation (IoD) 2019 were published by the Government in September 2019, and updates the previous 2015 Indices, published in September 2015. The Indices of Deprivation measure relative levels of deprivation in 32,844 small areas or neighbourhoods, called Lower-layer Super Output Areas, in England

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains of deprivation which are combined and weighted to calculate the Index of Multiple Deprivation 2019

In the IMD 2019, Watford is ranked 195 out of 317 authorities, putting it in the 7th decile nationally. This means that, overall, Watford is less deprived than half the authorities in England.

Watford is the third most deprived authority in Hertfordshire. (Stevenage and Broxbourne are the most deprived.) However, three Hertfordshire authorities are among the 10% least deprived authorities in England (Three Rivers, East Herts and St Albans).

Overall, Watford is not an area with significant deprivation issues and the majority of the LSOAs within the town are in the bottom 50% of LSOAs nationally for deprivation; the borough's position has improved relative to that of 2015.

The combined deprivation index, which weights income and employment more heavily than the other domains, obscures the more deprived areas in Watford, which are affected by crime, living environment deprivation, health and disability, and education, skills and training deprivation in particular. This is, at least in part, because income and employment deprivation are less of an issue for Watford than for other areas.

The ten most deprived LSOAs in Watford, as ranked in the IMD 2019 are as follows (the ranking for the last IMD data in 2015 is shown in brackets in the first column). Deprivation has also been identified as an indicator for poorer COVID-19 outcomes so understanding our areas of deprivation, particularly if we apply greater granularity around health and income deprivation. The LSOA, which contains some of Whippendell Road, Chester Road and Durban Road West is within the second most deprived health and disability quartile does not feature in the top 10 most deprived LSOAs.

Watford rank	Ward	LSOA code	Hertfordshire		England	
			Rank	Decile in Herts (1st = most deprived)	Rank	Decile (1st = most deprived)
1 (1)	Central (Water Lane, Gladstone Road, Grosvenor Road, part of Radlett Road, Brockleberry Close, Raphael Drive, top part of Queens Road)	E01023860 (009B)	5 (5)	1st (1st)	5055 (5005)	2nd (2nd)
2 (3)	Holywell (Caractacus Green, part of Charlock Way, Moor View, Jellicoe Road, Stripling Way, Rose Gardens)	E01023865 (011C)	21 (22)	1st (1st)	7239 (7800)	3rd (3rd)
3 (2)	Meriden (Garsmouth Way, Aldbury Close, Harvest End, part of York Way)	E01023876 (003D)	26(19)	1st (1st)	7924 (7590)	3rd (3rd)
4 (4)	Holywell (Ascot Road, Greenhill Crescent, Caxton Way, Croxley View)	E01023866 (011D)	27 (30)	1st (1st)	8294 (9203)	3rd (3rd)
5 (7)	Woodside (Haines Way, Queenswood Crescent, Sheriff Way, Nottingham Close)	E01023906 (001C)	61 (41)	1st (1st)	10719 (10062)	4th (4th)
6 (10)	Oxhey (Deacons Hill, Blackwell Drive, Riverside Road, Eastbury Road, Thorpe Crescent)	E01023883 (012B)	62 (49)	1st (1st)	10758 (10710)	4th (4th)
7 (13)	Callowland (Maude Crescent, St George's Road, Breakspere Close, Nicholas Close)	E01023857 (006C)	67 (56)	1st (1st)	10894 (10812)	4th (4th)
8 (9)	Meriden (Gaddesden Crescent, Bovingdon Crescent, Garston Lane)	E01023877 (003E)	73 (75)	2nd (2nd)	11225 (11837)	4th (4th)
9 (12)	Leggatts (The Harebreaks, Chestnut Walk, Foxhill, Brushrise, Elm Grove)	E01023870 (004C)	78 (52)	2nd (1st)	11515 (10734)	4th (4th)
10 (5)	Stanborough (Clarke Way, Rushton Avenue, Orbital Crescent, Harris Road)	E01023891 (002B)	92 (31)	1st (1st)	11970 (9377)	4th (3rd)

MOSAIC profile

Our MOSAIC profiling of the borough enhances our understanding of our population and provides valuable context for our decision-making as well as underpinning our communications and engagement. It confirms we are a young and diverse borough.

	Mosaic Code	Name	Description	Number of Household	2017 Watford %	2016 Watford %	Difference	Trend	Rank (last year)
1	J40	Career Builders	Singles and couples in their 20s and 30s progressing in their field of work from commutable properties	4,045	12.5%	11.9%	0.6%		1
2	I36	Cultural Comfort	Thriving families with good incomes in multi-cultural urban communities	3,321	10.3%	8.7%	1.6%		2
3	D14	Cafes and Catchments	Affluent families with growing children living in upmarket housing in city environs	2,499	7.7%	8.0%	-0.3%		3
4	D17	Thriving Independence	Well-qualified older singles with incomes from successful professional careers living in good quality housing	2,422	7.5%	5.4%	2.1%		7
5	M56	Solid Economy	Stable families with children renting better quality homes from social landlords	2,172	6.7%	6.4%	0.3%		6
6	J44	Flexible Workforce	Young renters ready to move to follow worthwhile incomes from service sector jobs	1,954	6.0%	7.0%	-1.0%		4
7	H35	Primary Ambitions	Forward-thinking younger families who sought affordable homes in good suburbs which they may now be out-growing	1,550	4.8%	6.8%	-2.0%		5
8	B08	Premium Fortunes	Influential families with substantial income established in large, distinctive homes in wealthy enclaves	1,237	3.8%	3.2%	0.6%		10
9	I37	Community Elders	Established older households owning city homes in diverse neighbourhoods	1,128	3.5%	4.1%	-0.6%		8
10	I39	Ageing Access	Older residents owning small inner suburban properties with good access to amenities	1,099	3.4%	3.4%	0.0%		9

Mosaic Profile 2020

5. How will the council ensure equality is promoted through the Local Plan

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Local Plan:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

You will need to add in the findings from the consultation to the EIA.

A. Positive impacts

The Local Plan is a document that seeks to improve the quality of new development and the influence it has on its surrounds. By virtue, the document seeks to have a positive impact on the community. There are a number of specific policies that respond to specific groups, including the protected characteristics. The policies make provision for new housing that meets the needs of the elderly and those with disabilities, including wheelchair accessible and dementia friendly accommodation.

Improvements to infrastructure may also aid some of the protected characteristics. The Plan supports the provision of new health facilities to meet the needs of the community, such as the

elderly, those with disabilities or pregnant people. Transport infrastructure improvements may also support those who cannot drive, which includes young people, the elderly, and those with disabilities and/or impairments.

The Plan also seeks to make sure the provision of community, cultural, social, and leisure facilities meets the needs of the community. This may have a positive impact on the protected characteristics for it provides space for groups to meet e.g. religious, gender based or ethnic groups.

The Watford Borough Council website features browsealoud, which allows for translations into a large number of languages, speech and larger text. This enables the council to offer information and engagement in a way that addresses potential barriers, which could potentially discriminate, albeit unintentionally.

Through establishing a broad and comprehensive approach to consultation and engagement, the council is actively seeking to embrace all of its communities, reducing barriers and, by listening to all the feedback it receives, shape the town in a way that builds on the strength and cohesion of its diverse communities

B. Negative impacts

The analysis of the Watford population identifies the diversity of the borough. This analysis acknowledges that this diversity could mean that there are some parts of our communities who may find it harder to engage with the council on the Local Plan and consequent planning applications, which would mean the outcomes / decisions might not reflect all groups living and working in the town or the people we serve.

However, we do acknowledge that in order to meet our equalities duty, particularly around fostering good relations and eliminating discrimination we need to ensure that residents respond proportionately. Planning can be a complex issue and can be difficult for people to navigate and fully understand in terms of its impacts on individuals, communities and the borough overall. The document is also somewhat long to ensure all content is covered and some planning terms have been used. This could be because of language barriers, physical or learning disabilities or age. There are a number of practical steps that can be taken to address these issues, these could be through signposting translation, working with groups or individuals that represent parts of our community or explaining policies and documentation face to face. A professional proof reader has edited the Plan to ensure that it is comprehensible and a glossary has been included as an appendix to the Plan to explain key terms. Visuals have also been used to make the Plan more engaging and accessible.

6. Overall conclusion

The Plan is a document which seeks to improve the quality of new development. By ensuring that new development is inclusive and accessible, the Plan should have an overall positive impact. The Plan also makes provision for specific groups through housing mix, design considerations and through the allocation and protection of land for certain uses.

Ways to make the document more accessible to the public, as well as encouraging broad participation in consultation, should be continued.

Summary of potential positive impacts and ways in which they can be ensured

Protected characteristics	Positive Impact	Ways to ensure the positive impact
Age	<p>The Local Plan identifies issues related to services and provision for different age groups. This includes provision of a mix of homes to meet the needs of people at different lifecycle stages housing for an ageing population (i.e. sheltered accommodation) and facilities required by different age groups such as schools for young people.</p>	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to increase the prospect of delivery in a timely manner and in the right location.
Disability	<p>Identification of issues related to services and provision for those with physical and/or mental disabilities. This includes increased provision of accessible housing, specialist housing and supported living accommodation and the requirement to provide disabled parking bays in new development. Design considerations also address how new development can be made more accessible with those with disabilities, such as dementia friendly development.</p> <p>The council website also uses Browsealoud, which is able to which allows for speech reading and larger text.</p>	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.
Gender reassignment	<p>The Plan does not directly make specific provision for the protected characteristic of gender reassignment. Although, the Plan emphasises the importance of inclusivity and safety of scheme design</p>	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.

Protected characteristics	Positive Impact	Ways to ensure the positive impact
	and supports the provision of new social, health and community facilities, which may be used by those who have undergone or are undergoing gender reassignment.	
Pregnancy and maternity	Identification of issues related to services and provision for pregnant women and new parents. This includes support for new health facilities, to be located away from areas of poor air quality. The Plan emphasises the importance of inclusive and safe design and makes provision for community facilities.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be important to identify needs for new health and prenatal/neonatal facilities and to increase the prospect of delivery in a timely manner and in the right location.
Race	<p>The Local Plan makes provision for the needs of the gypsy and traveller community, by protecting land used by gypsies and traveller and allocating additional land to meet the future identified need. The Plan emphasises the importance of inclusive and safe design, and makes provision for cultural facilities which may be used by racial groups.</p> <p>The council website also uses Browsealoud, which is able to which allows for translations into several different languages.</p>	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.

Protected characteristics	Positive Impact	Ways to ensure the positive impact
Religion	The Plan emphasises the importance of inclusive and safe design and makes provision for community and cultural facilities, which includes places of worship and other religious facilities.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.
Sex (gender)	The Plan emphasises the importance of inclusive and safe design and makes provision for community facilities, which may be used by gender groups.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.
Sexual orientation	The Plan emphasises the importance of inclusive and safe design and makes provision for community facilities, which may be used by those with the protected characteristic of sexual orientation.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.
Marriage and civil partnership	The Plan emphasises the importance of inclusive and safe design and makes provision for community facilities, which may be used by those with the protected characteristic of marriage and civil partnership.	<ul style="list-style-type: none"> • Implementation of the draft policies when the Plan is adopted to ensure delivery. • Working with stakeholders will be key to identify needs and to increase the prospect of delivery in a timely manner and in the right location.

Summary of potential negative impacts and ways in which they can be removed or mitigated

Protected characteristics	Negative Impact	Ways to mitigate the negative impact
All	There may be issues with the accessibility of the document itself. The Plan is somewhat long (100+ pages) and contains some planning terms to be used by applicants when designing large schemes. However, this could become a barrier to successfully accessing the document by a member of the community with no prior involvement in planning before.	Document has been shortened from its original draft and has been edited by a professional proof reader for clarity. The inclusion of a variety of graphics in the document should also make it more visual and accessible. Contact details can be put on the document so the reader can speak to the planning department for clarity should it be required.
Age	Risk that certain age groups may not be well represented in forming the document through poor participation from the under 30s in past consultations.	Continue to use a variety of approaches to consult, such as social media balanced with more traditional methods such as public notices in local newspapers/magazines and posters in prominent locations. The document should be relevant and relatable to all ages.

This EIA has been approved by:

KR..... **Date 2/11/2020...**

Appendix 1

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership.

Policy	1	2	3	4	5	6	7	8	9	Comment
SS1.1 Spatial Strategy										The policy sets out how Watford will grow up until 2036. The policy places an emphasis on design to promote social inclusion, as well as providing communities with good access to facilities and services, and so a positive effect is expected for all of the protected characteristics.
CDA2.1: Watford Gateway Strategic Development Area			0	0	0	0	0	0	0	The policy establishes a broad framework for the development of the Watford Gateway Strategic Development Area. Potential improvements to transport infrastructure addressed in the policy specifically benefit those who are not able to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
CDA2.2: Town Centre Strategic Development Area	0	0	0	0	0	0	0	0	0	The policy establishes a broad framework for the development of the Town Centre Strategic Development Area. While the policy may support the regeneration of the area for the benefit of all the community, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CDA2.3: Colne Valley Strategic Development Area		0	0	0	0	0	0	0	0	The policy establishes a broad framework for the development of the Colne Valley Strategic Development Area. While the policy may support the regeneration of the area for the benefit of all the community, the policy requires the provision of a new school. Those who require access to education facilities may particularly

										benefit from the policy and so a positive impact has been identified in relation to the protected characteristic of age.
HO3.1 Housing Provision			0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for housing provision. The policy makes specific reference to specialist adaptations to the housing stock and so a positive impact has been identified in relation to the protected characteristic of age and disability.
HO3.2 Housing Mix, Density and Optimising Use of Land	0	0	0	0	0	0	0	0	0	The policy refers to requirements for optimal site densities and a better housing mix, including family housing provision. Whilst the policy is expected to have a positive impact, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HO3.3 Affordable Housing	0	0	0	0	0	0	0	0	0	The policy sets out the requirements for affordable housing provision. Whilst the policy is expected to have a positive impact, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HO3.4 Build to Rent	0	0	0	0	0	0	0	0	0	The policy sets out the requirements for build to rent unit provision. Whilst the policy is expected to have a positive impact, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HO3.5 Specialist Housing and Care Homes			0	0	0	0	0	0	0	This policy supports specialist housing and supported living accommodation for the elderly and those with disabilities. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
HO3.6 Student and Co-Living Housing		0	0	0	0	0	0	0	0	This policy supports student housing and co-living space. As the majority of students (unless mature) are aged between 18 and 21, this policy helps to provide lower cost living for students. Therefore a positive impact has been identified in relation to the protected characteristic of age.
HO3.7 Self-Build and Custom Housebuilding	0	0	0	0	0	0	0	0	0	The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HO3.8 Gypsies and Travellers	0	0	0	0		0	0	0	0	The policy protects land used by gypsy and travellers and makes provision for future land based on identified need. Therefore a positive impact has been identified in relation to the protected characteristic of race.
HO3.9 Residential Conversions	0	0	0	0	0	0	0	0	0	The policy sets out the requirements for HMOs. Whilst the policy is expected to have a positive impact by providing housing for people who can afford lower rents, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.

HO3.10 Building Standards for New Homes			0	0	0	0	0	0	0	The policy sets out building standards for new homes. Requirements for dementia friendly and wheelchair adaptable homes has been included so a positive impact has been identified in relation to the protected characteristics of age and disability.
HO3.11 Private and Communal Outdoor Amenity Space			0	0	0	0	0	0	0	The policy requires provision of communal open space on new schemes. The policy requires them to be accessible by all users and so a positive impact has been identified in relation to the protected characteristics of age and disability.
EM4.1 Providing New Employment	0	0	0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for employment in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.2 Designated Industrial Areas	0	0	0	0	0	0	0	0	0	The policy supports the protection and intensification of designated industrial areas. Whilst the policy is expected to have a positive impact on the community by providing more jobs, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.3 Office Development	0	0	0	0	0	0	0	0	0	The policy supports the protection and intensification of office floor space. Whilst the policy is expected to have a positive impact on the community by providing more jobs, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.4 Economic Development Outside Designated Employment Locations	0	0	0	0	0	0	0	0	0	The policy supports economic development across the borough, including provision of new employment land. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.5 Different Ways of Working	0	0	0	0	0	0	0	0	0	The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
EM4.6 Training, Skills and Professional Development		0	0	0	0	0	0	0	0	The policy requires new development to provide apprenticeships and training opportunities in the construction phase. A positive impact has been identified for the protected characteristic of age, as apprenticeships are often undertaken by those at school leaving age.
VT5.1 Supporting Vibrant Retail Centres	0	0	0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for retail in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
VT5.2 Watford Town Centre		0	0	0	0	0	0	0	0	The policy sets out requirements for future town centre uses. The policy restricts takeaways within 400m of a primary school, which may positively impact the health of primary school children.

										Therefore a positive impact has been identified in relation to the protected characteristic of age.
VT5.3 Local Centres	0	0	0	0	0	0	0	0	0	The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
QD6.1 Spatial and Place Shaping	0	0	0	0	0	0	0	0	0	This is a strategic policy for design. The Plan emphasises the importance of inclusive and safe design and makes provision for community and cultural facilities, which includes places of worship and other religious facilities.
QD6.2 Design Principles	0	0	0	0	0	0	0	0	0	This policy sets out key design principles. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
QD6.3 Public Realm										This policy sets out the design principles for public realm. A key principle in the policy is natural surveillance to increase perceptions of safety for those with protected characteristics that could be more vulnerable to crime, or even more targeted hate crime. Therefore, a positive impact has been recorded against all of the protected characteristics.
QD6.4 Building Design	0	0	0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for retail in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
QD6.5 Building Heights	0	0	0	0	0	0	0	0	0	The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HE7.1 Enhancement and Protection of the Historic Environment										This is a strategic policy which sets out the future vision for the historic environment in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HE7.2 Designated Heritage Assets	0	0	0	0	0	0	0	0	0	This policy seeks to protect Watford's designated heritage assets, which may have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HE7.3 Non-Designated Heritage Assets	0	0	0	0	0	0	0	0	0	This policy seeks to protect Watford's non-designated heritage assets, which may have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.

HE7.4 Archaeology	0	0	0	0	0	0	0	0	0	0	This policy seeks to protect Watford's archaeological assets, which may have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CC8.1 Mitigating Climate Change and Reducing Carbon Emissions	0	0	0	0	0	0	0	0	0	0	This is a strategic policy. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CC8.2 Sustainable Construction Standards for Non-Residential Development	0	0	0	0	0	0	0	0	0	0	The policy sets out sustainable construction standards for non-residential development. Whilst the policy is expected to have a positive environmental and economic impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CC8.3 Sustainable Construction and Resource Management	0	0	0	0	0	0	0	0	0	0	The policy sets out sustainable construction requirements and resource management. Whilst the policy is expected to have a positive environmental and economic impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
CC8.4 Managing Air Quality											The policy relates to improving air quality. It takes into account those vulnerable to the impacts of poor air quality and makes provision for sensitive development to be located away from areas of poor quality. This may positively impact the elderly, young children, those with disabilities (including respiratory illnesses) and pregnant women, as these groups are increasingly sensitive to poor air quality. Therefore a positive impact has been identified in relation to the protected characteristics of age, disability and pregnancy and maternity.
CC8.5 Managing the Impacts of Development	0	0	0	0	0	0	0	0	0	0	This policy seeks to protect the community from any potential negative impacts of development, such as noise and light pollution. The policy is expected to have a positive impact on the community, but does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.1 The Natural Environment	0	0	0	0	0	0	0	0	0	0	This is a strategic policy which sets out the future vision for the natural environment in Watford. The policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.2 Green Infrastructure Network	0	0	0	0	0	0	0	0	0	0	This policy seeks to protect and enhance Watford's green infrastructure network, which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral

										impact has therefore been recorded against the protected characteristics.
NE9.3 Blue Infrastructure Network	0	0	0	0	0	0	0	0	0	This policy seeks to protect and enhance Watford's blue infrastructure network, which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.4 Flood Risk and Mitigation	0	0	0	0	0	0	0	0	0	The policy seeks to minimise flood risk. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.5 Surface Water Management	0	0	0	0	0	0	0	0	0	The policy seeks to minimise surface water flood risk. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.6 Protecting Open Space	0	0	0	0	0	0	0	0	0	This policy seeks to protect and enhance Watford's open spaces which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.7 Providing New Open Space	0	0	0	0	0	0	0	0	0	This policy relates to the provision of open space in new development which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
NE9.8 Biodiversity	0	0	0	0	0	0	0	0	0	This policy relates to the improvement of the biodiversity value of new development, which is expected to have a positive impact on the community. However, the policy does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
IN10.1 Integrated Infrastructure Delivery			0		0	0	0	0	0	The strategic policy relates to provision of new infrastructure to support development, including health and education facilities. Whilst the policy may have a positive impact on all of the community, those who require more frequent access to health, education and leisure facilities may particularly benefit from the policy. Therefore a positive impact has been identified in relation to the protected characteristics of age, disability and pregnancy and maternity.
IN10.2 Providing Infrastructure			0		0	0	0	0	0	The strategic policy relates to provision of new infrastructure to support development, including health and education facilities. Whilst the policy may have a positive impact on all of the community, those who require more frequent access to health, education and leisure facilities may particularly benefit from the

to Support New Development										policy. Therefore a positive impact has been identified in relation to the protected characteristics of age, disability and pregnancy and maternity.
IN10.3 Development Contributions			0		0	0	0	0	0	The policy relates to obtaining development contributions to support the necessary infrastructure provision. Whilst the policy may have a positive impact on all of the community, those who require more frequent access to health, education and leisure facilities may particularly benefit from the policy. Therefore a positive impact has been identified in relation to the protected characteristics of age, disability and pregnancy and maternity.
ST11.1 Sustainable Travel Town			0	0	0	0	0	0	0	The policy sets out the strategic vision to move towards a sustainable travel town. Potential improvements to public transport including the development of mass rapid transit addressed in the policy specifically benefit those who are not able to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
ST11.2 Protecting and Enhancing Future Public Transport Routes and Watford Junction Station Area as a Transport Hub			0	0	0	0	0	0	0	The policy seeks to protect public transport routes and Watford Junction as a transport hub. Potential improvements to transport infrastructure addressed in the policy specifically benefit those who are not able to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
ST11.3 Providing Sustainable Transport Infrastructure for Major Development			0	0	0	0	0	0	0	The policy seeks to ensure new development has access to sustainable transport. Potential improvements to transport infrastructure addressed in the policy specifically benefit those who are not able to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
ST11.4 A Walking and Cycling Infrastructure Improvement Town	0	0	0	0	0	0	0	0	0	The policy specifies requirements to improve infrastructure for active travel. Whilst the policy will generally have a positive environmental impact by encouraging sustainable travel, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
ST11.5 Electric Vehicles, Car Parking and Car Clubs	0		0	0	0	0	0	0	0	The policy sets out requirements for car parking in new developments. The policy makes specific provision for designated parking bays for those with disabilities. Therefore a positive impact has been identified in relation to the protected characteristic of disability.
ST11.6 Managing the Transport			0	0	0	0	0	0	0	The policy seeks to ensure new development has access to sustainable transport, including developer contributions to mass rapid transit. Potential improvements to transport infrastructure addressed in the policy specifically benefit those who are not able

Impacts of Development										to drive by supporting the provision of alternative travel modes. This includes those with disabilities, some of the elderly population or those too young to drive. Therefore a positive impact has been identified in relation to the protected characteristics of age and disability.
HC12.1 Healthy Communities										The policy sets out the strategic vision to create healthy communities. The policy makes specific reference to the importance of access to health facilities, as well as other community facilities. A positive impact has therefore been recorded against the protected characteristics.
HC12.2 Health Impact Assessments	0	0	0	0	0	0	0	0	0	This policy requires new development to provide health impact assessments. Whilst the policy is expected to have a positive impact on the community, it does not include any direct or indirect references to any of the protected characteristics against which it has been assessed. A neutral impact has therefore been recorded against the protected characteristics.
HC12.3 Built Cultural and Community Facilities										The policy relates to community facilities. It is an inclusive policy that supports social, community and cultural venues where they meet the social, leisure, cultural and religious needs of the community. Therefore, a positive impact has been recorded against all of the protected characteristics.
AS13.1 Allocated Housing Sites for Delivery		0	0	0	0	0	0	0	0	This policy allocates sites for redevelopment for housing. The policy requires provision of a school on some of the strategic sites to support the needs of young people. Therefore a positive impact has been identified in relation to the protected characteristic of age.