Equality and Fairness Impact Assessment

Please refer to the guidance available on Equality & Fairness Impact Assessments - HR Hub when completing this form.

If you haven't submitted an EFIA before, or if your proposal requires an in-depth review, please email it to our Inclusion Team before submission on Firmstep. Please allow at least three weeks in advance of your CMT/Committee/Cabinet deadline to ensure that there's sufficient time for review and discussion about any mitigations that could be made.

Section 1

What is your proposal and what will change as a result? Please give an overview of your proposal. What decisions are you seeking?

This Equalities and Fairness Impact Assessment (EFIA) assesses the draft 'Focused' Wealden Local Plan Regulation 18 stage, prior to its publication for public consultation[1] in early February 2026. This consultation will be undertaken in line with the Council's Statement of Community Involvement[2]. The new Local Plan will be the key planning document for Wealden District, excluding the area covered by the South Downs National Park Authority (SDNPA). The SDNPA has planning powers for its own area.

This draft 'Focused' Wealden Local Plan (Regulation 18) document seeks to provide updates and amendments to the previous draft Wealden Local Plan (Regulation 18) that underwent consultation previously between March and May 2024. Since the last public consultation on the Local Plan, a new National Planning Policy Framework (NPPF) was produced (December 2024) that has increased housing need within the district and has altered national affordable housing policy, amongst other matters.

Therefore, the Council has chosen to publish a draft 'focused' Wealden Local Plan to consider those national planning policy changes. The changes to the draft Wealden Local Plan therefore focus on increasing development potential across the district, and as such a revised development strategy and proposed site allocations are presented. In addition, a new policy area on Coastal Change Management is presented as new evidence has been prepared on this policy area over the last year. Revised policies have also been provided on matters such as sustainable drainage, affordable housing and site criteria for Gypsy, Traveller and Travelling Showpeople accommodation. Other policies areas that are not presented in this draft 'Focused' Wealden Local Plan will be carried forward with further amendments to the final Regulation 19 version of the Local Plan, which will

[1] Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012
[2] Statement of Community Involvement (SCI) (November 2025)

be published for further representations later in 2026, before it is then submitted to the Planning Inspectorate (PINS) for its Examination in Public (EiP) sessions. The new timetable for the Local Plan, known as the Local Development Scheme (LDS) is on our website[3].

The Wealden Local Plan looks ahead to 2042; it will provide a vision for the district, a long-term spatial strategy for growth, including the locations where development will take place. It will provide a range of both strategic and non-strategic policies that will guide development across the district contributing to social, environmental and economic (sustainability) goals. Once adopted, the Local Plan will form part of the Development Plan for the district, replacing all existing local plan policies and will be used to assess and make decisions on planning applications, as well as to inform investment and the provision of infrastructure.

Overall, this Plan seeks to meet the district's needs and priorities, whilst protecting our natural, built and physical environments. It seeks to ensure that future growth is delivered alongside infrastructure needs and improvements, as well as deliver on climate change objectives. It also seeks to ensure that our communities are supported with the services and facilities that they need to support daily life.

As part of the plan-making process, we are required to undertake a Sustainability Appraisal (SA) and a Habitats Regulations Assessment (HRA). A SA evaluates the social, economic and environmental impacts of the local plan and its policies. It is an iterative process and is integral to plan-making, ensuring that the Local Plan and its policies contribute to sustainability. We have published this alongside the draft 'focused' Wealden Local Plan. The Conservation of Habitats and Species Regulations 2017[4] require an assessment to be made of the potential effects of a local plan on the integrity of European sites. The HRA process considers whether the emerging local plan will adversely affect the integrity of any European site, and this will be progressed for the next Regulation 19 stage. The Council previously published an HRA in March 2024.

As part of the plan-making process, we also need to undertake an EFIA. The EFIA is a way to help identify the likely or actual effects of policies upon all people and sectors of the community. The aim of the assessment is to ensure that any negative consequences for those people with protected characteristics as defined by the Equality Act 2010[5] are eliminated or minimised, and opportunities for promoting equality are maximised.

The NPPF at paragraph 96 also requires planning policies and decisions to "enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health

[3] Wealden District Council Local Development Scheme (LDS) (January 2026)
[4] The Conservation of Habitats and Species Regulations 2017
[5] Equality Act 2010

and well-being needs and reduce health inequalities between the most and least deprived communities". In essence, national planning policy supports a Health Impact Assessment (HIA) of the Local Plan to be undertaken to ascertain whether planning policies prevent ill health, promote good health and/or healthy lifestyles and reduce health inequalities. We have chosen to integrate the HIA of the local plan into our SA process.

Given the breadth of the draft 'Focused' Wealden Local Plan (Regulation 18) document and the policies it contains, short summaries will be provided of the relevant policies which are considered to have a positive or negative impact on each characteristic as relevant. Policies which are considered to have an overall neutral impact on each characteristic will not be covered in this assessment. This EFIA will be updated once more prior to the publication of submission draft Wealden Local Plan (Regulation 19) in order to inform that iteration of the Local Plan process.

Section 2

Consider what impact this proposal will have on different communities by assessing each characteristic. You will need to indicate what impact you anticipate for each group and explain why.

Age

The impact on people of a certain age or people within a certain age group (i.e., children or older persons).

- **Positive**
- Negative
- Neutral

Why?

Policy CC8 (Sustainable Drainage) – **Positive** - requires all development proposals to include adequate drainage provision and seek to reduce flood risk and contribute to flood alleviation. Additionally, the policy requires development within the Pevensey Levels hydrological catchment area to demonstrate effective avoidance or mitigation of impacts on the hydrological quality of the Pevensey Levels Special Area of Conservation (SAC) and Ramsar site[6]. The policy is written positively and is expected to impact all equalities groups in a positive manner. However, it is considered that it is older and disabled people who will benefit the most from the adoption of such a policy, as evidence shows that the impacts of climate change disproportionately affect the most vulnerable.

Policy CC9 (Coastal Change Management Area) – **Positive** - Longterm risk-based planning reduces exposure of older residents (higher coastal flood/health vulnerability) to future hazards. It also supports managed adaptation/relocation if required. It will also support residents of any age, especially younger residents as

[6] Both designations are internationally recognised and protected under The Conservation of Habitats and Species Regulations 2017.

they plan for their future, looking for secure housing and family planning within the local area.

Policy HO8 (Affordable Housing) – **Positive** - provides a framework to secure affordable housing for those on lower incomes who cannot secure housing through the open market. There may also be a positive effect on older and disabled people as these groups tend to have a higher housing need.

The spatial development strategy, site allocations and associated policies will have positive impacts too, as it will provide maximum opportunities for all age groups across the district to access the housing market as well as improve employment opportunities within the local area.

Disability

The impact on people with a physical or mental impairment, which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

- **Positive**
- Negative
- Neutral

Why?

Policy CC9 (Coastal Change Management Area) – **Neutral** - reducing future erosion/flood risk protects **disabled people** (more adversely affected by emergencies and displacement). However, if the policy is adopted at a later stage and the Council chooses to invoke an Article 4 direction[7] (a separate process) that removes permitted development rights from homeowners, this could hinder installation of some accessibility features if not properly exempted.

Policy CC8 (Sustainable Drainage) – **Positive** - requires all development proposals to include adequate drainage provision and seeks to reduce flood risk and contribute to flood alleviation. Additionally, the policy requires development within the Pevensey Levels hydrological catchment area to demonstrate effective avoidance or mitigation of impacts on the hydrological quality of the Pevensey Levels SAC and Ramsar site. The policy is written positively and is expected to impact all equalities groups in a positive manner. However, it is considered that it is older and disabled people who will benefit the most from the adoption of such a policy, as evidence shows that the impacts of climate change disproportionately affect the most vulnerable.

Policy HO8 (Affordable Housing) – **Positive** - provides a framework to secure affordable housing for those on lower incomes who cannot secure housing through

[7] A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.

the open market. There may also be a positive effect on older and disabled people as these groups tend to have a higher housing need.

The spatial development strategy, site allocations and associated policies will have positive impacts too, as it will provide maximum opportunities for all members of society to access the specialist type of housing required, as well as improve employment opportunities within the local area.

Gender reassignment

The impact on "a person who is proposing to undergo, is undergoing, or has undergone a process (or part of a process) for the purpose of reassigning their sex by changing physiological or other attributes of sex." It's important to note, the Equality Act 2010 protects those who are transgender (a person who identifies with the opposite sex to what they were assigned at birth) and non-binary (a person who doesn't identify with the sex they were assigned at birth nor the opposite sex, or identifies with both genders) and does not require them to have undergone medical transitioning.

- Positive
- Negative
- **Neutral**

Why?

The Local Plan is a land use plan, so there are no specific relevant policies for this group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area. General community safety will be ensured through other polices in the Local Plan, such as health, well-being and quality of life, which will be presented in the final Regulation 19 version of the Local Plan.

Marriage and civil partnership

The impact on anyone who is married or in a civil partnership. It is important to note that same-sex and opposite-sex couples can both be married or have a civil partnership.

- Positive
- Negative
- **Neutral**

Why?

The Local Plan is a land use plan, so there are no specific relevant policies for this group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area.

Pregnancy and maternity

The impact on those that are pregnant or expecting a baby, including the maternity period (the period after the birth, up to 52 weeks but may be earlier as the protected period ends when the person returns to work). This also includes the impact on those that are breastfeeding.

- Positive
- Negative
- **Neutral**

Why?

The Local Plan is a land use plan, so there are no specific relevant policies for this group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area. However, the concept of a 20-minute neighbourhoods and sustainable and accessible development would have a positive impact on this group of the community.

Race

The impact on “people from different racial groups, people with different nationalities and people from different ethnic/national origins”. Particularly, those who are marginalised in our society through institutional and social barriers.

- **Positive**
- Negative
- Neutral

Why?

The plan includes policies on provision of pitches/plots for Gypsy, Traveller and Travelling Showpeople sites, as well as a draft criterion-based policy under which planning applications for Gypsy, Traveller and Travelling Showpeople sites will be assessed against. The amended policies in this ‘Focused’ Draft Wealden Local Plan include policy SS3 (Gypsy, Traveller and Travelling Showpeople – Accommodation Needs) and policy HO9 (Gypsy, Traveller and Travelling Showpeople – Site Criteria).

Policy SS3 (Gypsy, Traveller and Travelling Showpeople - Accommodation Needs) – **Positive** - sets out that the Council will endeavour to provide for 51 pitches for Gypsies and Travellers and 3 plots for Travelling Showpeople to meet identified needs. The Plan, alongside this policy has provided 27 ‘potential’ pitches on

new/existing sites within Wealden District that it will consult on. This policy is expected to have a positive impact on the race characteristic, as the policy seeks to address the needs of a specific race/group of individuals/minority group.

Policy HO9 (Gypsy, Traveller and Travelling Showpeople – Site Criteria) – **Positive** - sets out the criteria that will be taken into account when determining planning applications for new or extended permanent and temporary sites for Gypsies, Travellers and Travelling Showpeople. This policy is expected to have a positive impact on the race characteristic, as the policy addresses the needs of a specific race/ group of individuals/minority group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area. Community safety will be supported through other policies in the Local Plan, which would be important for people from different racial groups. In addition, affordable housing would have a positive impact for people from marginalised ethnic backgrounds who often experience disadvantages when accessing housing.

Religion or belief

The impact on anyone with a particular religion or belief system (including philosophical beliefs), as well as those without a religion or belief system. Particularly, those who are marginalised in our society through institutional and social barriers.

- Positive
- Negative
- **Neutral**

Why?

The Local Plan is a land use plan, so there are no specific relevant policies for this group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area. Sustainable and accessible communities will enable people within the community to better access places of worship and support community cohesion.

Sex

The impact on men and women, boys and girls.

- Positive
- Negative
- **Neutral**

Why?

The Local Plan is a land use plan, so there are no specific relevant policies for this group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area. Sustainable and accessible communities will allow better and safer access to local amenities and support.

Sexual orientation

The impact on all sexual orientations, including heterosexuality (attraction to the opposite sex) and non-heterosexual orientations which are typically grouped under the LGBTQ+ (Lesbian, Gay, Bisexual, Trans, Questioning/Queer) umbrella.

- Positive
- Negative
- **Neutral**

Why?

The Local Plan is a land use plan, so there are no specific relevant policies for this group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area. Sustainable and accessible communities will allow better and safer access to local amenities and support.

Caring responsibilities

The impact on people who have caring responsibilities (they look after another person or persons who wouldn't be able to cope without their help, typically due to the cared-for person's ill health, mental health condition, disability or addiction).

- **Positive**
- Negative
- Neutral

Why?

Policy HO8 (Affordable Housing) – **Positive** - provides a framework to secure affordable housing for those on lower incomes who cannot secure housing through the open market. There may also be a positive effect on older and disabled people as these groups tend to have a higher housing need, which will indirectly support those with caring responsibilities.

The spatial development strategy, site allocations and associated policies will have positive impacts too, as it will provide maximum opportunities for all members of

society across the district to access the housing market as well as improve employment opportunities within the local area.

Language

The impact on people who don't speak English as their first language and those with lower literacy skills.

- Positive
- Negative
- **Neutral**

Why?

The Local Plan is a land use plan, so there are no specific relevant policies for this group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area.

Planning Policy documents are unfortunately long in nature, with larger supporting documents. They are not always accessible to all, but this is incredibly difficult to remedy. The Council assist with this by providing helpful guidance documents, frequently asked questions and information on how to have your say. The Council also holds public in-person exhibitions across the district, where professional officers can answer questions on such documents.

Socio-economic status

The impact on people based on their class, financial circumstances and living situations, including those experiencing homelessness.

- **Positive**
- Negative
- Neutral

Why?

Policy HO8 (Affordable Housing) – **Positive** - provides a framework to secure affordable housing for those on lower incomes who cannot secure housing through the open market. There may also be a positive effect on this group who tend to have a higher housing need.

Policy HO9 (Gypsy, Traveller and Travelling Showpeople – Site Criteria) – **Positive** - sets out the criteria that will be taken into account when determining planning applications for new or extended permanent and temporary sites for Gypsies, Travellers and Travelling Showpeople. In general terms, this group tends to have lower incomes and are generally disadvantaged in accommodation terms owing to acute need for this type of accommodation within Wealden and generally

across Sussex. The provision of this type of accommodation will generally assist with group.

Policy CC9 (Coastal Change Management Area) – **Neutral** – Avoiding the construction of new permanent development in high-risk areas for coastal flooding will reduce the future loss of assets and protects public finances as well as support climate resilience. However, lower income households may face greater hardship from relocation, increased insurance costs, property blight, or reduced development opportunities.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area.

Sustainable and accessible communities will allow better and safer access to local amenities and employment opportunities. The draft Local Plan states that "the draft spatial strategy seeks to allocate the majority of growth in and around our market towns and at the edge of regional towns located outside of our district (i.e. Eastbourne and Tunbridge Wells), whilst enabling an appropriate scale of development in a number of settlements where these have a good level of key services and facilities, can access public transport and have good accessibility to larger settlements. Some growth within our most sustainable towns and villages will support our existing communities, helping to retain and improve essential key services and facilities, as well as support the rural economy through job provision in those locations and by providing local workers to support businesses".

It also notes that "an increase in local employment opportunities in the district will also reduce the need for out commuting and will impact positively on the climate change agenda, by reducing carbon emissions through reducing the need to travel to access employment".

In addition, the provision of affordable housing within the High Weald National Landscape is crucial and makes a valuable contribution to the area in terms of retaining younger people and those in rural work, which tends to be lower paid.

UK Armed Forces

The impact on people who are currently serving or have served in the UK Armed Forces. This includes reservists or part-time service i.e., Territorial Army, and people within the immediate family or same household, including bereaved families.

- Positive
- Negative
- **Neutral**

Why?

The Local Plan is a land use plan, so there are no specific relevant policies for this group.

In general, the spatial development strategy, site allocations and associated policies will have positive impacts, as it will provide maximum opportunities for all members of society across the district to access the housing market as well as improve employment opportunities within the local area. However, affordable housing could have a positive impact on people affiliated with the UK Armed Forces.

Section 3

Which parts of the Public Sector Equality Duty are most relevant to the proposal?

1. *Eliminate discrimination, harassment and victimisation.*
    - Yes
    - **No**

    Why?

    Eliminating discrimination, harassment and victimisation have no direct relevance to the Local Plan itself.

    Access to the consultation is important. Whilst we do not have specific targets for responses from key demographics, we plan to monitor the level and types of responses, to help inform future consultations. The simplified version of the Local Plan that is presented in the virtual exhibition will help people of all ages and diversity within the community be able to access and understand the issues presented.

2. *Advance equality of opportunity*
    - Yes
    - **No**

    Why?

    Advancing equality of opportunity has no direct relevance to the Local Plan itself. However, the plan outlines how people can access accessible housing, affordable homes and connect communities which is related to equality of opportunity to access housing etc.

3. *Foster good relations*
    - **Yes**
    - No

    Why?

    Transparency when publishing the local plan. Mandatory engagement in consultation with the public, revised SCI helps foster good relations by diversifying engagement methods.

Section 4

1. *What mitigations have you identified for each negatively impacted group in section 2? If you cannot identify any, please explain. For example, a replacement service does not exist or there is no resource.*

We have addressed some negative impacts in the Action Plan which can be found below.

2. *What information have you used to assess the above anticipated impacts on different groups? Have you conducted any consultation or carried out any research? Use this space to explain any data (internal and external), academic research, theories, models you have taken into account.*

We have not carried out any specific consultation exercise prior to the publication of this draft 'Focused' Wealden Local Plan (Regulation 18) document. However, we did receive useful feedback from our meeting with the Wealden Disability group on the Statement of Community Involvement (SCI) that has helped us think proactively about how we publish, present and consult on the Local Plan to make it more accessible to the general public. This feedback was fed into the adopted SCI (November 2025). We include an equal opportunities monitoring form with our Local Plan response form but have not been able to gather a sufficient level of data to get a good understanding of overall representation in planning policy consultations.

3. *If you believe there are any additional groups who may be positively or negatively impacted, please record this here. Outline what you anticipate the impacts to be for these groups and any mitigations you have identified.*

Rural communities are an additional group who may be positively or negatively impacted by this draft 'Focused' Wealden Local Plan. There are some actions identified in the Action Plan that can relate to this part of the community.

Section 5: Action Plan

Issue Identified	Action	Team(s)	Required Resources	Target Date	Measure of Success
Accessibility of Local Plan consultation materials for disabled people, older residents and those with lower digital literacy	Publish consultation materials in multiple accessible formats (HTML-first, large print, screen-reader compatible PDFs, plain English summary); provide clear guidance on how to request alternative formats	Planning Policy Team; Communications; Equalities/ Inclusion Team	Officer time; accessibility checking tools; printing costs (as required)	Prior to the launch of the consultation (Feb 2026)	Accessible formats available at consultation launch using all available channels; positive feedback from disability and older people's groups; reduced accessibility-related complaints
Risk that Coastal Change Management policies could disproportionately affect lower-income, older or disabled residents through relocation pressures or property blight	Ensure supporting text clearly references managed adaptation, long-term engagement and alignment with external funding/ assistance mechanisms; signpost residents to advice and support	Planning Policy Team; Coastal Management Officers; Housing	Officer time; liaison with partners	Prior to the Regulation 19 Local Plan publication	Policy wording and supporting text strengthened; no equality objections raised at the Regulation 18 or Regulation 19 stages
Potential unintended impacts of removal of permitted development rights in Coastal Management Areas on accessibility adaptations	Include clarification in supporting text that necessary accessibility adaptations for disabled residents will be supported through the planning application process	Planning Policy Team; Development Management; Equalities/Inclusion Team	Officer time	Prior to the Regulation 19 Local Plan publication	No evidence of disabled residents being disproportionately prevented from making accessibility adaptations to their property

Issue Identified	Action	Team(s)	Required Resources	Target Date	Measure of Success
Ensuring affordable housing policies respond effectively to the needs of older people, disabled people and carers	Continue to work with Housing and Adult Social Care colleagues at East Sussex CC to align Local Plan affordable housing policy with identified specialist and accessible housing needs	Planning Policy Team; Housing; Adult Social Care	Officer time; existing housing needs evidence	Ongoing; reviewed for Regulation 19 stage	Evidence of alignment between Local Plan policies and housing needs evidence; and consultation feedback
Engagement of Gypsy, Traveller and Travelling Showpeople communities in plan-making	Targeted engagement with representative groups during consultation; ensure consultation materials are culturally appropriate and clearly explain site policies	Planning Policy Team; Communications	Officer time; stakeholder engagement	Regulation 18 and Regulation 19 stages	Consultation responses received from Gypsy, Traveller and Travelling Showpeople stakeholders; reduced risk of policy challenge
Limited equality monitoring data from consultations	Improve visibility and usability of the equal opportunities monitoring form; encourage completion while keeping it voluntary	Planning Policy Team; Digital Services	Minor form amendments; officer time	Prior to 'Focused' Regulation 18 consultation	Increased completion rates of monitoring forms compared to previous consultations. Analyse what the equalities monitoring data does tell us and set appropriate targets

Issue Identified	Action	Team(s)	Required Resources	Target Date	Measure of Success
Need to evidence ongoing consideration of equalities through plan evolution	Update the EFIA at Regulation 19 stage to reflect consultation responses, policy changes and any emerging equality issues	Planning Policy Team; Equalities/ Inclusion Team	Officer time	Prior to Regulation 19 publication	Updated EFIA published alongside Regulation 19 Local Plan
Ensuring staff awareness of equality considerations in plan-making	Brief Planning Policy and Development Management teams on EFIA findings and equality-sensitive implementation of policies	Planning Policy/ Development Management; Equalities/ Inclusion Team	Officer time; internal briefing	Prior to Regulation 19 stages	Staff awareness evidenced through consistent policy application and reduced equality-related complaints