

City of York Council and Centre for Applied Human Rights

Human Rights and Equality Assessment Tool (HREA)

An Equality Assessment Tool is an evidence-based approach designed to help organisations ensure that any Policy, Criterion or Practice (PCP), is fair and does not create barriers or disadvantage any protected groups from participation. This covers both strategic and operational activities.

City of York Council (CYC) combines this approach with York's commitment as a Human Rights City to produce a Human Rights and Equality Assessment tool (HREA).

This document enables CYC to evidence its legal duty to give 'due regard' to those with protected characteristics under the Equality Act and consider Human Rights at the same time.

Whether a HREA is needed or not will depend on the likely impact that a PCP may have and relevance of the activity to Equality and Human Rights.

The HREA should be started when the need for a new PCP is first identified, or when an existing one is reviewed. It is essential to continue to update the HREA during the life of the PCP, as and when new information is learned. It is not complete until the PCP is complete.

Non-discrimination is a minimum standard. The development of the HREA should prompt critical discussion and highlight disproportionate impacts.

Balancing residents' rights and CYC duties can be very complex and sometimes there will be no 'win-win', so compromises or mitigations may need to be identified to ensure the best outcomes.

Finally, the value in a HREA is in both the short and long term, by investing in this process CYC will create robust, meaningful, and empowering policies that are more likely to stand the test of time.

Who is submitting the proposal?

Directorate	City Development		
Service Area	Strategic Planning Policy		
Name of proposal	Plan-making activity (Local Plan including Minerals and Waste Planning)		
Lead Officer	Alison Cooke – Head of Strategic Planning Policy		
Date Assessment Started	28 July 2026 (note EIA process started March 2026 https://democracy.york.gov.uk/documents/s188399/Item%208%20-%20Plan-making%20activity%20and%20Local%20Plan%20Review%20-%20Annex%20E.pdf)		
Date Assessment Completed	Ongoing		
Names of those who contributed to the assessment			
Name	Job Title	Organisation	Area of Expertise
Alison Stockdale	Strategic Planning Manager	City of York Council	Strategic Planning
Gail Goodall	Strategic Planning Policy Officer	City of York Council	Strategic Planning
Jacinta Ward	Strategic Planning Policy Officer	City of York Council	Strategic Planning
Laura Swiszczowski	Head of EDI	City of York Council	EDI
David Smith	Access Officer	City of York Council	EDI

1.1	What is the purpose of the proposal
	Please explain your proposal in plain English avoiding acronyms and jargon. Consider using Age 9 English.
	The purpose of this report is to present an assessment of the initial stage in plan-making activity being undertaken by City of York Council under the Town and Country Planning (Local Planning) (England) Regulations 2026 Reg. 20: the Local Plan 2045 Scoping Consultation. The Scoping Consultation is the first stage in producing a new Local Plan for York. It reflects the reforms to the planning system advanced through updates to the National Planning Policy Framework (NPPF), the Levelling Up and Regeneration Act 2023 (LURA), and evolving national guidance, alongside the Government’s stated ambition to create a more streamlined, rules-based system supported by digital planning. A scoping consultation represents an important early and statutory stage in the reformed Local Plan process. It is used to establish the baseline framework for plan preparation and the plan’s strategic vision. Its primary purposes are to: · Identify and prioritise the key spatial, environmental, social and economic issues facing the authority area, including the plan vision · Gather baseline data and intelligence from stakeholders, infrastructure providers and the community · Establish the scope and proportionate level of evidence required to underpin the plan · Highlight spatial options, strategic choices and potential policy themes for further testing · Inform the project plan, including risks, dependencies and alignment with national reform requirements This activity sets a framework for the future development of the area in relation to housing, the economy, community facilities, waste and minerals, and infrastructure – as well as considering how to conserve and enhance the natural and historic environment, mitigate and adapt to climate change, and achieve well designed places. Further, the Scoping Report considers who and how we intend to consult on plan-making, in the context of the adopted Statement of Community Involvement and Community Engagement Strategy [link]. The aim is to enable good quality engagement from a diverse range of sources in order to provide a strong foundation for the Local Plan.

Background

Equalities and Human Rights is one of the four commitments of the Council Plan. The Council is committed to creating opportunities for all, providing equal opportunity and balancing the human rights of everyone to ensure residents and visitors alike can benefit from the city and its strengths.

In April 2026, a report to Executive presented the forthcoming Plan-making activity being undertaken by City of York Council, as well as presenting a proposal to refresh York's Local Plan. An Equalities Impact Assessment was carried out to support the initial reporting of the intention to commence work on a new Local Plan – see <https://democracy.york.gov.uk/documents/s188399/Item%208%20-%20Plan-making%20activity%20and%20Local%20Plan%20Review%20-%20Annex%20E.pdf>

As a Minerals and Waste Planning Authority we have a statutory duty to produce a Minerals and Waste Plan. At the time of reporting on forthcoming Plan-making activity it was intended that our statutory duties on Minerals and Waste would be fulfilled by reviewing the joint Minerals and Waste Plan for York and North Yorkshire. However, it is now intended that the Minerals and Waste Plan will form part of York's new Local Plan. In July 2026, a decision was taken by [Executive Member](#) to this effect.

Step 1 – Aims and intended outcomes

1.2	Are there any external considerations?
	Legislation / government directive / codes of practice etc.
	Plan making activities must accord with the following legislation: • Planning and Compulsory Purchase Act 2004 (as amended) • Localism Act 2011 • Levelling Up and Regeneration Act 2023 (LURA 2023) • Planning and Infrastructure Act (PIA) 2025 • Town and Country Planning (Local Planning) (England) Regulations 2026

- The Neighbourhood Planning (General) Regulations 2012
- The Neighbourhood Planning (Referendums) Regulations 2012

The new National Planning Policy Framework provides the overarching policy context, with local plans expected to avoid duplication of national policy. This will dictate the content of Local Plans.

Statements of Community Involvement are a statutory requirement. Under the provisions of the Planning and Compulsory Purchase Act 2004, local authorities are required to update their adopted SCI every 5 years. While the Town and Country Planning regulations are updating requirements for consultation, this presents a flexible approach to determine bespoke consultation and engagement strategies for planning policy purposes.

The Equality Act 2010 provides a legal framework to protect the rights of individuals and advance equality of opportunity for all, which protects individuals from discrimination and unfair treatment whilst promoting a fair and more equitable society.

1.3 Who are the stakeholders and what are their interests?

Consider both internal and external stakeholders.

The Town and Country Planning (Local Planning) (England) Regulations 2026 specify the scope of general and specific consultation bodies who should be invited to engage in plan making. The local planning authority can specify any other bodies that they consider appropriate or may have an interest in the preparation of the local plan. Anyone can comment on the Scoping Consultation.

Plan-making in York is relevant to anyone who lives, works studies or carries out business in the authority. This includes Local Communities, Voluntary and community Sector, officers at City of York Council and Planning Agents and the Developer community. It also includes stakeholders, such as statutory consultees, who may have an interest in strategic planning in the city.

As part of the [Consultation and Engagement strategy \[link\]](#) for the Local Plan we consider it appropriate for the scoping consultation to be released citywide so that residents can engage with the consultation. We also intend to

	have targeted consultation with key stakeholders including developers, environmental groups, public service providers and under represented groups.
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1.4	What results / outcomes do we want to achieve and for whom?
	Explain what outcomes you want to achieve for stakeholders, staff and the wider community. Demonstrate how the proposal links to the Council Plan (2023- 2027) and other corporate strategies and plans. Highlight how the proposal meets the objectives of Equalities, Affordability, Climate and Health.
	The preparation of a new Local Plan directly supports the Council Plan (2023–2027) priorities, including: • Delivering sustainable and inclusive growth • Addressing housing needs • Tackling climate change and promoting environmental sustainability • Supporting economic development and infrastructure delivery The scoping consultation contributes to these priorities by ensuring that the Local Plan is evidence-led, community-informed, and aligned with strategic objectives. York is operating within a rapidly changing policy, economic, social, and environmental context. National reforms to the planning system, regional strategies through the York and North Yorkshire Combined Authority, and evolving expectations on a complex range of issues require the Council to maintain an up-to-date spatial framework. Our local policy will be able to set an effective spatial response that optimises benefits for communities. Since preparation of the current adopted Local Plan there has been significant city-wide strategy development in York, articulated in the city’s collective vision set out in ‘York 2032: The 10-Year Plan’. The new Local Plan must reflect the city’s strategic ambitions as articulated in York 2032 and related strategies on climate change, the economy, health and wellbeing, transport, skills and culture. The plan will provide a coherent basis for delivering sustainable development across the city. All of the above need to shape the development plan for the city.

David Smith 01/02/2024

Step 2 – Resources utilised

3.1	What sources of data, evidence and consultation feedback have you used to help understand the impact of the proposal on equality rights and human rights?	
	Please consider a range of sources, including consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.	
	Source of data / supporting evidence	Reason for using this source
	Statutory legislation (as set out in Section 1.2 above)	Sets the requirements and formal framework for plan-making
	National Planning Policy Guidance	Provides guidance about the requirements
	National Planning Policy Framework	National Planning Policy for England and how it should be applied
	Stakeholder engagement	The new Local Plan will update the existing adopted City of York Local Plan and Joint Minerals and Waste Plan for York and North Yorkshire. Both plans were informed by significant and wide-reaching stakeholder engagement. The new plan-making system includes a minimum of 3 statutory consultation stages which should be advised by a consultation strategy. The proposal allows for approval of the consultation strategy to be delegated to the Director of City Development; this will set out in detail stakeholder mapping, events and how consultation will be conducted. Preparation will be subject to iterative HREAT and Environmental Outcome Reporting and these will be published at each statutory consultation stage and/or when applicable.
	York's Adopted Local Plan (2025)	Provides the local policy framework against which the CIL, non-statutory guidance and neighbourhood Plans will be developed. This was subject to extensive consultation and public examination and is supported by evidence base, including iterative EIA.
	Adopted Minerals and Waste Joint Plan (2022)	Provides the local and cross-boundary policy framework against which forthcoming Minerals and Waste policy for York will be developed. This was

		subject to extensive consultation and public examination and is supported by evidence base, including iterative EIA.
	Community Infrastructure Levy (2025)	City-wide consultation on the Community Infrastructure levy charging schedule has been undertaken. This was supported by evidence base, EIA and was subject to public examination prior to adoption in November 2025.
	A wide range of evidence base informs the adopted and emerging Local Plan, including: - Census data - Climate Change Strategy and Action Plan - Health and Wellbeing Strategy - Air Quality Action Plan - Health and Wellbeing Strategy - Joint Strategic Needs Assessment - NHS Humber and North Yorkshire People Story Dashboard - Local Transport Strategy - Housing Needs Assessment - Economic Forecasting	Provides the information and data gathered to support the development of the plan and ultimately justify the "soundness" of the policy approach, including physical, economic, and social characteristics of an area.

David Smith 01/02/2024

Step 3 – Screening the impacts or effects.

3.1	Equality-related obligations derive from the Equality Act of 2010 and the Human Rights Act of 1998.
	Once you have engaged with stakeholders you will need to identify how this proposal impacts on their human rights and equalities. Although table one looks complex, its purpose is to facilitate an initial screening of equalities and human rights impacts of your proposal. Many human rights and equalities will not be affected by the decision you are seeking Executive or Council approval for and so can be left blank. The aim here is to identify pressure points regarding human rights and equalities that require attention. Please see the Appendix for details of the protected characteristics and human rights to consider The rights listed below in the first column are the relevant ones from the Human Rights Act, and the York Human Rights City Network Indicator Report (non-discrimination, education, health and social care, housing, a decent standard of living). The human rights in the Indicator Report were selected by residents of York as their priority rights. In the first row the protected characteristics under the Equality Act are listed, to which 'Everyone' has been added to capture impacts that affect everyone without distinction.

Step 3.1 Table 1 – Screening the impacts or effects

Equalities Human Rights	Everyone	Age including financial, digital exclusion impacts	Disability Including financial, digital exclusion impacts	Gender	Gender reassign- ment Including Trans, Non- binary, Intersex	Marriage and civil partnership	Pregnancy and maternity	Race	Religion and belief	Sexual orientation	Carers inc financial, digital exclusion impacts	Low-income groups inc financial, digital exclusion impacts	Veteran, armed forces community	Those with experience of Care
Right to life*														
Prohibition of torture*	Neutral													
Prohibition of slavery and forced labour*	Neutral													
Right to liberty, movement and security (including freedom of movement)***	Neutral													
Right to a fair trial*	Neutral													
No punishment without law*	Neutral													
Right to private and family life***	Yes	•	•	•	•			•		•				
Freedom of thought, conscience, and belief***	Neutral													
Freedom of expression***	Neutral													
Freedom of assembly***	Neutral													
Right to marry***	Neutral													
Right to property***	Neutral													
Right to education***	Yes													
Right to free elections***														
Right to housing***	Yes													

David Smith 07/02/2024

Step 3.2 Table 2 – Assessing the impact of your proposal

Here you will need to record the details on all the impacts identified for both Human Rights and those with Protected Characteristics.

Where you have identified an impact on a protected characteristic/human right in the table above, please indicate whether this is positive or negative and give a description of this impact. If you run out of rows, please add as necessary.

Rights clashes and restrictions

Where rights clash or are being restricted, you will need to explain how the decision has been taken, that the limitation on human rights is provided by law, for a legitimate purpose (justified), and proportionate (the minimum necessary restriction on rights).

Use the following guidance to inform your responses:

First, think about what equalities or rights might be engaged by the proposal, and describe the likely impact of the proposal, and provide an evaluation.

Use the following questions to inform your responses if human rights or equalities are limited or qualified in any way:

- Why are a person's rights being restricted?
- What is the problem being addressed by the restriction on someone's rights?
- Will the restriction lead to a reduction in the problem?
- Does that restriction involve a blanket policy, or does it allow for different cases to be treated differently?
- Does a less restrictive alternative exist?
- Has sufficient regard been paid to the rights and interests of those affected?
- Do safeguards exist against error or abuse?

Table 2

Protected Characteristics or Human Rights	Key findings / impacts	Positive (+) Negative (-) (Neutral (0))	High (H) Medium (M) Low (L)
Age	<u>Section 1 – Housing and Specialist Accommodation Needs</u> Housing is a key equality issue within the Local Plan. Within the scoping material there is a focus on housing for older people, opportunities for downsizing, and supported accommodation and accessible homes. These contribute a positive impact for age as a range of housing options are accommodated for within York.	Positive	Medium
	<u>Section 1 – Housing and Specialist Accommodation Needs</u> The scoping report acknowledges that there are affordability concerns in York which significantly impacts graduate retention following university, and this will be addressed through consultation. At Gateway One of plan making we will complete a HREA specifically for Section 1, and will consider age in the Consultation and Engagement strategy.	Negative	Medium
	<u>Section 2 – Economy, Jobs and Investment</u> The local plan recognises economic inclusion as a priority and acknowledge inequalities in life expectancy linked to socioeconomic conditions. For age specifically the plan demonstrates positive opportunities for youth employment, graduate retention, and older workers.	Positive	High
	<u>Section 3 – Education and Skills</u> The local plan recognises unequal access to opportunities as a challenge, with age being one of these central issues. These include	Negative	medium

	early years, school provision, further education and lifelong learning. Digital exclusion is a factor for older people and other age brackets with lower socio economic background. A HREA will be completed for Section 3		
	<u>Section 9 – Health, Wellbeing and Inequality, Section 10 – Transport, Movement and Active Travel and Section 11 – Spatial Strategy.</u> The need for the built environment to provide for a range of needs is scoped in. This includes the needs of older people who may be more dependent on public transport and local services. The sustainable location of development and associated transport policies which seek to ensure improvements to public transport and interchange facilities will benefit this group. Policy decisions around good placemaking, where community facilities are provided, or identifying the need for new or enhanced primary and secondary care, will have a direct impact on the City’s health. This is especially important in the context of the aim to reduce the gap in healthy life expectancy between the richest and poorest communities in York (currently 10 years for men and 6 years for women). Placemaking considers the range of access to public open space and built sports facilities which contribute to a person’s wellbeing. Scoping considers embedding Health Impact Assessment and HREA into the plan-making and planning process to address the wider determinants of health and help improve population health outcomes.	Negative	High
	<u>Section 7 – Heritage</u> There is potential for conflict between policy which seeks to preserve local character/designated assets and the needs of older people in relation to adaptations to improve accessibility. York is rich in heritage, in both its built and natural environments. The built environment should be inclusive and accessible.	Neutral	

	<u>Section 8 – Environment, Climate and Green Infrastructure</u> Policies which encourage sport and physical activity, including access to open space, play space and built sports facilities, are considered an important asset to meet the differing needs across all age brackets, encouraging people to engage in healthier lifestyles. Actions to improve environmental outcomes and support climate resilience, such as urban tree-planting, new cycle routes or community woodland enable all age groups better access to safe and accessible greenspace.	Positive	Low
	<u>Section 8 – Environment, Climate and Green Infrastructure</u> Younger and older people are more susceptible to the impacts of environmental pollution. The potential for risks from pollution are scoped into the emerging plan. These address air quality, land contamination, noise control and light pollution. Scoping consultation will consider whether current policy settings remain effective and whether additional measures are needed to address cumulative impacts, sensitive receptors and emerging evidence.	Negative	Medium
Disability	<u>Section 1 – Housing and Specialist Accommodation Needs</u> There is recognition of disabled residents and aging populations within the scope of this section, and the need to provide a suitable portion of new homes that are adaptable and/or wheelchair accessible. Council will also be seeking standalone housing for disabled people through strategic sites, and/or portions of development for accessible accommodation. Provision of affordable housing should consider the needs of disabled people.	Negative	High

	At Gateway One of plan making we will complete a HREA specifically for Section 1, and consider Disability in the Consultation and Engagement strategy.		
	<u>Section 4 – Retail, Tourism, and Culture, Section 5 – Design, Section 9 – Health, Wellbeing and Inequality, Section 10 – Transport, Movement and Active Travel and Section 11 – Spatial Strategy</u> The need for the built environment to provide for a range of access needs is scoped in. Scoping emphasises the creation of people-friendly environments that support physical activity, social interaction and mental wellbeing. This includes the requirements of disabled people who may be more dependent on public transport and/or local services. The sustainable location of development and associated transport policies which seek to ensure improvements to public transport and interchange facilities will benefit disabled people. Transport policy scopes in the use of active travel modes including walking, wheelchair-use, wheeling and cycling. Scoping considers embedding Health Impact Assessment and HREA into the plan-making and planning process to address the wider determinants of health and help improve population health outcomes.	Negative	High
	<u>Section 7 – Heritage</u> There is potential for conflict between policy which seeks to preserve local character and the needs of disabled people in relation to adaptations to improve accessibility. York is rich in heritage, in both its built and natural environments. The built environment must inclusive and accessible.	Neutral	
	<u>Section 8 – Environment, Climate and Green Infrastructure</u>	Negative	High

	Disabled people are more susceptible to the impacts of environmental pollution. The potential for risks from pollution are scoped into the emerging plan. These address air quality, land contamination, noise control and light pollution. Scoping consultation will consider whether current policy settings remain effective and whether additional measures are needed to address cumulative impacts, sensitive receptors and emerging evidence. At Gateway One of plan making we will complete a HREA specifically for Section 8, and consider Disability in the Consultation and Engagement strategy.		
Gender reassignment	<u>Section 9 - Health, Wellbeing and Inequality</u> Policy decisions around good placemaking, where community facilities are provided, or identifying the need for new or enhanced primary and secondary care, will have a direct impact on the City's health. This is especially important in the context of the aim to reduce the gap in healthy life expectancy between the richest and poorest communities in York (currently 10 years for men and 6 years for women). At Gateway One of plan making, we will complete a HREA specifically for Section 9.	Negative	
Marriage and Civil Partnership	No impacts on this protected characteristic have been identified at this stage.	Neutral	
Pregnancy and Maternity	<u>Section 2 – Economy, Jobs and Investment</u> Pregnancy and maternity have high levels of employment discrimination. At Gateway One of plan making we will complete a HREA specifically for section 2.	Neutral	

Race <i>Note: While we are specific in identifying the Gypsy and Traveller community, this is because we currently have evidence to support their specific housing needs. Further work will be undertaken as part of plan-making to establish the needs of other groups.</i>	<u>Section 1 – Housing and Specialist Accommodation</u> Gypsies and Travellers are recognised communities and the need to ensure access to specialised accommodation is provided for within the scope. The Local Plan will identify sites for pitches and evidence informing the local plan will identify the need for additional pitches, and sites will be identified based on the evidence received. Council will work closely with community representatives and our Gypsy and Traveller liaison officer to better understand the needs, location, and access to these sites. Other ethnic minorities, refugees and asylum seekers can be negatively impacted by racial hate crime, impacting on location of housing.	Negative	High
	<u>Section 3 – Education and Skills</u> There are potential conflicts between policy outcomes and lived experience of the plan, with regards to education attainment disparities and access to higher education. At Gateway One of plan making we will complete a HREA specifically for section 3.	Negative	Medium
	<u>Section 11 – Spatial Strategy</u> Gypsies and Travellers are recognised in law as distinct ethnic groups, and therefore protected under the Equality Act from discrimination on the basis of race. A sustainable spatial strategy which recognises their specific needs has the potential to have positive impacts on the community.	Positive	
	<u>Section 9 – Health, Wellbeing and Inequality</u> Gypsies and Travellers are recognised as amongst the most marginalised groups, with relatively poor health outcomes. Policy	Negative	High

	which provides sustainable and accessible day-to-day health care, shops, education and other services will help to reduce inequalities. At Gateway One of plan making we will complete a HREA specifically for section 9.		
	Council recognise that there is a growing ethnic minority population in York, who's needs will need to be recognised through the Local Plan, including access to sites, safety, and housing design options.	Negative	Medium
Religion and Belief	Council recognise that there is a growing ethnic minority population in York, who's needs will need to be recognised through the Local Plan, including access to sites and safety.	Negative	Medium
Sex	<u>Section 1 – Housing and Specialist Accommodation</u> Women are disproportionately affected by housing affordability, lone parent households and safety in housing / built environment design. There is potential further need to address this through the scope of the Local Plan housing affordability, lone parent households and safety in housing / built environment design. Domestic abuse also a factor here. At Gateway One of plan making we will complete a HREA specifically for Section 1.	Negative	Medium
	<u>Section 5 – Design</u> There are potential impacts on the built environment through safety, lighting and natural surveillance, these are relevant and scoped into the local plan through design.	Neutral	
	<u>Section 3 – Economy, Jobs and Investment, Section 4 - Education and Skills</u>	Positive	

	York has a high employment rate, with 78.7% of working-age residents (16-64) in employment in 2025/26*. Female employment stands at 77.8%, slightly below the male rate of 79.7%. This suggests that women participate strongly in the labour market, although a small gender gap remains, potentially reflecting factors such as caring responsibilities and part-time working patterns. <i>*Data Source: York Open Data 2025/2026</i>		
	<u>Section 8 – Environment, Climate and Green infrastructure</u> Issues of unequal access to open space have been identified in the scoping report. Projects such as ‘Make space for Girls’ have identified the distinct needs of girls and young women when planning for built and open space. At Gateway One of plan making we will complete a HREA specifically for section 8.	Negative	Medium
Sexual Orientation	<u>Section 9 – Health and Wellbeing / Section 5 – Design.</u> Concerns for safety and access have been identified and recognised through evidence being that the second most reported crime in York is LGBTQ+ hate crime. There will be opportunities to engage with local communities, specifically on health, wellbeing and design, to incorporate policies that improve placemaking and sense of place. The plan should consider how to provide safe spaces for all communities, through initiatives such as ‘Designing out Crime’.	Negative	

Other social – economic groups

Carer	For plan-making, there will be opportunities to engage with carers through various consultation stages; this will be outlined in forthcoming consultation strategies.		
Care Leavers	For plan-making, there will be opportunities to engage with carer leavers through various consultation stages; this will be outlined in forthcoming consultation strategies.		
Low income groups	For plan-making, there will be opportunities to engage with low income groups through various consultation stages; this will be outlined in forthcoming consultation strategies.		
Veterans and armed Forces	There is potential for this group to be considered as part of future evidence-base. There will be opportunities to engage veterans and armed forces and we'll consider their specific age/disability related needs.		
Other			
Human Rights (list any rights impacted)			
Right to Life	Age, disability and race (including Gypsy and Traveller communities and other ethnic minority groups) are identified as particularly sensitive receptors in relation to environmental pollution and minerals and waste planning. While Minerals and Waste development may affect life expectancy, the plan will recognise this risk and avoid any potential conflict.		
Right to Education	The Plan scopes in the needs of York's various demographic age groups, including the following issues: expanding FE/HE institutions; protecting childcare provision; ensuring school capacity aligns with growth, and; supporting lifelong learning and skills.		

Right to Housing	York faces high housing costs, in both sale and rental markets. There is a growing need for accessible and specialist housing, including for York's increasing older demographic. York's student communities are struggling to access affordable accommodation, and limiting graduates ability to stay in York. Scoping decisions about housing need, density and site selection will shape whether future policies impact on the right to housing.		
Right to private and family life, home and correspondence	York's geography and demographics may unequally impact the community's right to engage in public life. Rural villages may be excluded if consultation is city-centric. Disabled residents may face barriers accessing information. Certain groups may feel underrepresented if engagement is not targeted.		

Step 4 – Gaps in data and knowledge

4.1	What are the main gaps in information and understanding of the impact of your proposal?		
	When conducting your screening, you may have discovered gaps in data or knowledge that make it difficult to assess whether your proposal had a positive or negative impact on human rights/equalities. Please indicate actions you will take to resolve this gap. As your proposal progresses you may be able to resolve this knowledge gap –please indicate when it was resolved.		
	Gaps in data or knowledge	Action to deal with this	Date resolved
	Full details of the new plan-making system are not yet available, and a revised NPPF has only recently been published. Information is	Officers to keep up to date with changes in planning policy and guidance.	Ongoing

	being released incrementally by MHCLG.		
	Full impacts of the new Local Plan cannot be known until it has been progressed	Further information will be gained via public consultation at statutory stages and continued annual monitoring of the adopted Local Plan. It is the purpose of the Scoping Consultation stage to identify gaps in data and knowledge, including in terms of who and how to engage communities in plan-making. This stage of plan-making involves the collection of baseline data to understand the equalities profile of the district and some of the potential issues facing protected groups.	Ongoing

Step 5 - Maximising positive impacts

5.1	What has been done to optimise opportunities to advance equality / human rights or foster good relations?
	The Local Plan is currently at an early scoping stage and, as such, positive outcomes are not yet measurable. However, equality, human rights and accessibility considerations are being embedded from the outset. The Local Plan will be subject to ongoing HREAT throughout its preparation, including at all consultation stages, to ensure that potential impacts are addressed as the evidence base and policy approach develop. A key priority is ensuring that information and engagement opportunities are accessible to all of the community. This includes providing a range of communication and engagement methods, making use of both digital, non-digital, face-to-face approaches, and using diverse data sources to understand the needs and experiences of different groups. Engagement activities will seek to meet people within their own communities and trusted settings, using accessible and neutral venues that are appropriate to the groups concerned, including, for example, Gypsy and Traveller communities, disabled people, younger people, environmental groups, educational settings and other under-represented communities. Engagement is being undertaken at a very early stage to allow communities and stakeholders to influence the direction and scope of the Local Plan before options are developed. Feedback received during the scoping stage will directly inform subsequent consultation stages, which will provide further opportunities for residents, businesses, community organisations and other stakeholders to shape emerging evidence, spatial options and draft policies as the plan progresses. This iterative approach is intended to support meaningful participation and build ongoing relationships with communities throughout the plan-making process. In line with national planning requirements, consultation processes will follow a consistent approach that is applied across England. This promotes fairness, transparency and equal access by ensuring that all participants engage through the same process. This approach can benefit groups who may otherwise be less represented, as it creates a level playing field between local residents, landowners, developers, businesses, students living in York on a temporary basis, and those with interests in the city who reside elsewhere. The standardised process helps ensure that all views are considered equally and reduces barriers to participation based on an individual's resources, location or organisational capacity.

David Smith 01/02/2024

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision.	
	Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column. There are four main options you can take:	
	No major change to the proposal	The HREAT demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality / human rights and foster good relations, subject to continuing monitor and review.
	Adjust the proposal	The HREAT identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
	Continue with the proposal (despite the potential for adverse impact)	You should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations
	Stop and remove the proposal	If there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

	Option Selected	Conclusion / justifications
	No major change to the proposal	The HREAT demonstrates the proposal is robust at this stage. There are opportunities to advance equality and foster good relations through targeted and specific consultation in plan-making, which will be subject to continuing monitor and review.

Step 7 – Summary of agreed actions resulting from the assessment

7.1	What action, by whom, will be undertaken as a result of the impact assessment.			
	List below the actions or mitigations that have been identified and who will be responsible to carrying them out. Add as many lines as you need.			
	Impact / Issue	Actions to be taken	Person Responsible	Timescale
	Review of scoping consultation report	At this stage, the Scoping Consultation sets out the broad issues likely to underpin future strategic policy. Future HREA to consider the impact and implications of evidence base and emerging policy scope. These will be completed individually for each section of the scope.	Alison Cooke	Ongoing – timetable aligned to stages of Local Plan production. HREAT to be undertaken ahead of statutory consultation stages and published as part of the suite of evidence.
	Review of targeted stakeholder consultation – Plan-wide Community Engagement Strategy and Scoping Consultation Strategy.	At this stage, the Scoping Consultation must accord with the Town and Country Planning (Local Planning) (England) Regulations 2026 Reg. 20 and engage general and specific consultees and any other bodies that the Council consider appropriate or may have an interest in the preparation of the Local Plan. Engagement at this stage should ensure: - the purpose, target audience and objectives are clearly set out - people understand the plan-making process - mixed methods of engagement are used	Alison Cooke Lauren Summers	Pre-scoping consultation (July-August 2026) Ongoing

David Smith 01/02/2024

Step 8 - Monitor, review and improve

8.1	How will the impact of your proposal be monitored and improved upon going forward?
	Consider how will you identify the impact of activities on protected characteristics, other marginalised groups and human rights going forward? How will any learning and enhancements be capitalised on and embedded?
	The Local Plan Timetable and Activity Schedule will be updated as necessary to ensure the plan-making timetable remains up-to-date. Iterative HREAT will also be carried out to inform Local Plan preparation and will be published as part of statutory consultations and/or when relevant. The adopted Local Plan (2025) and Joint Minerals and Waste Plan policies continue to be monitored in accordance with an agreed monitoring framework and reported through the statutory Annual Monitoring Report. This will be used to inform the detail of future plan-making. Once adopted it is anticipated that the new Local Plan will be monitored annually and reviewed every 5 years, in line with the Regulations.

Appendix A

Equality, Diversity & Inclusion (EDI): Protected characteristics

Under the public sector duties introduced by the Equality Act 2010 public bodies must have due regard for the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the act, such as the failure to make reasonable adjustments for disabled people
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

These duties relate to the nine protected characteristic groups defined by the Equality Act 2010 (outlined in the table below).

The Council recognises that a person's socio-economic background and whether they live in a rural or urban location can be important factors in determining fair access to services, employment and treatment. When carrying out analysis, you must also consider socio-economic issues and rural / urban location issues. In addition to the nine protected characteristic the HREAT includes the following equality groups:

- Carers
- Low income groups
- Veterans, armed forces community
- Experience of care/Other (other groups that are impacted)

Human rights differ from equalities in two main ways:

- First, human rights apply to everyone and not just groups with protected characteristics.
- Second, they allow for the balancing of rights, priorities, and risks. Many rights are not absolute and can be limited or qualified in particular circumstances.

The following guidance identifies which rights are most likely to be engaged by proposals in certain policy areas. This doesn't mean that you should not consider whether other rights might be engaged.

There are three types of human rights in the Human Rights Act:

Absolute rights: Cannot be breached in any circumstances e.g. right to life and to protection from torture and inhuman or degrading treatment.

Limited rights: can only be restricted in specific situations e.g. a person can be deprived of their liberty if they are convicted of an offence and imprisoned.

Qualified rights: human rights can be restricted if it is in the interests of the wider community or to protect other people's rights e.g. freedom of movement and assembly were restricted during the Covid-19 pandemic in the interests of public health.

As limited and qualified rights are not absolute, they sometimes have to be balanced in decision making. In Table 1, absolute rights are indicated with an *; limited rights with a **; and qualified rights with a ***.

Right	Description	Focus Area
Right to life	Nobody, including the Government, can take someone's life away. Public authorities must take appropriate measures to safeguard life including by protecting people whose life might be in danger. Public authorities should also consider the right to life when making decisions that might endanger or affect life expectancy. When public officials may be involved in an instance when someone died, public authorities must investigate.	• Benefits and money • Births, deaths and marriages • Children and families • Environment and animals • Health and social care • Housing • Planning and building • Waste and recycling
Right to liberty and security	It focuses on protecting individuals' freedom from unreasonable detention, as opposed to protecting personal safety. However, there is case law from other jurisdictions where this right also covers personal safety in conditions other than detention.	• Right to liberty and security

Freedom from torture and inhuman or degrading treatment	Torture consists in causing very serious and cruel physical or mental pain or suffering. Inhuman treatment or punishment is treatment which causes intense physical or mental suffering. Degrading treatment means treatment that is extremely humiliating and undignified. Inhuman or degrading treatment could include: serious physical assault; very severe detention conditions or restraints; serious physical or psychological abuse in a health or care setting.	• Children and families • Health and social care
Right to marry and start a family	Right of men and women of marriageable age to marry and to start a family.	• Births, deaths and marriages
Prohibition of slavery and forced labour	Slavery is when someone owns someone else like a piece of property. Servitude is when someone provides services to a person for no reward and is unable to stop due to coercion. Forced or compulsory labour is when someone is forced to do work to which they have not agreed to, under the threat of punishment.	• Children and families • Jobs, training and volunteering • People and communities
Right to a fair trial	This right is triggered when someone is charged with a criminal offence and have to go to court, or a public authority is making a decision that has an impact on someone's civil rights or obligations.	• Environment and animals • Health and social care • People and communities • Streets, roads and pavements
No punishment without law	No one can be charged with a criminal offence for an action that was not a crime when it was committed. Public authorities must explain clearly what counts as a criminal offence so that people know when they are breaking the law.	• Environment and animals • People and communities • Streets, roads and pavements
Right to property	No public authority, without very good reason can take away one's property, which may include things like land, houses, objects, shares, licences, leases, patents, money, pensions and certain types of welfare benefits. This right applies to companies as well as individuals.	• Benefits and money • Business • Council tax • Environment and animals • Housing • Planning and building • Travel and transport • Streets, roads & pavements • Waste and recycling

Right to private and family life, home and correspondence	This includes one's right to determine their sexual orientation, lifestyle, and the way one looks and dresses. It also includes the right to control who sees and touches one's body. It further covers one's right to develop their personal identity and to forge friendships and other relationships, the right to participate in essential economic, social, cultural and leisure activities. In some circumstances, public authorities may need to facilitate the enjoyment of one's right to a private life, including their ability to participate in society. It also means that personal information about anyone (including official records, photographs, letters, diaries and medical records) should be kept securely and not shared without their permission, except in certain circumstances.	• Benefits and money • Births, deaths and marriages • Children and families • Health and social care • Jobs, training and volunteering • Parking and permits • Planning and building • Schools and education • Sports and leisure
Right to free elections	Public authorities must support the right to free expression by holding free elections at reasonable intervals. These elections must enable anyone to vote in secret.	• Births, deaths and marriages • People and communities
Freedom of thought, conscience and belief	This may include the right to change religion or beliefs, the right to put one's thoughts and beliefs into action, for example by exercising the right to wear religious clothing, the right to talk about one's own beliefs or take part in religious worship. Public authorities cannot stop anyone from practising their religion, without very good reason. This right protects a wide range of non-religious beliefs including atheism, agnosticism, veganism and pacifism. This includes the right to express views aloud (for example through public protest and demonstrations) or through published articles, books or leaflets, television or radio broadcasting, works of art, the internet and social media. It further protects the right to receive information from other people by, for example, being part of an audience or reading a magazine.	• Business • Schools and education
Freedom of expression	This includes the right to express views aloud (for example through public protest and demonstrations) or through published articles, books or leaflets, television or radio broadcasting, works of art, the internet and social media. It further protects the right to receive information from other people by, for example, being part of an audience or reading a magazine.	• Business • Environment and animals • People and communities • Schools and education • Sports and leisure
Freedom of assembly and association	This encompasses the right to form and be part of a trade union, a political party or any another association or voluntary group. Nobody has the right to force anyone to join a protest, trade union, political party or another association.	• Environment and animals • Jobs, training and volunteering • People and communities • Travel and transport • Streets, roads and pavements

Right to education	This right protects one's right to an effective education within the UK's existing educational institutions. It relates to primary, secondary, and higher education. Parents have a right to ensure that their religious and philosophical beliefs are respected during their children's education.	• Children and families • Environment and animals • Jobs, training and volunteering • People and communities • Schools and education • Sports and leisure
Right to housing	Adequate housing must provide more than four walls and a roof. For housing to be adequate, it must, at a minimum, meet the following criteria: Security of tenure, that is legal protection against forced evictions, harassment and other threats; availability of services, materials, facilities and infrastructure; affordability, which means that housing is not adequate if its cost threatens or compromises the occupants' enjoyment of other human rights; Habitability, which relates to physical safety or adequate space, as well as protection against the cold, damp, heat, rain, wind, other threats to health and structural hazards; accessibility, in that it must accommodate the specific needs of disadvantaged and marginalised groups; location, which means that it must not be cut off from employment opportunities, health-care services, schools, childcare centres and other social facilities, or it must not be located in polluted or dangerous areas; cultural adequacy, which means that it must respect and take into account the expression of cultural identity.	• Benefits and money • Housing • People and communities • Planning and building • Waste and recycling