



Hertsmere Local Plan
Regulation 19 Publication October 2026

Equality Impact Assessment (EqIA) Form

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Introduction - What is an Equalities Impact Assessment (EQIA)?

An EqIA is defined by the Equality and Human Rights Commission¹ as “a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody”. EqIAs help local authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should not be an afterthought and should inform policy preparation from the earliest stages of plan making.

EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent *Race Relations Act 2000*. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent *Equality Act 2010* removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions from April 2011, local authorities still have a legal duty to “give due regard” to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying.

Legislation

The requirement to consider the impacts of policies and strategies upon certain equality target groups through EqIA process arises from the following legislation.

Race Relations (Amendment) Act 2000

This amendment required local authorities to be pro-active in promoting racial equality by undertaking a Race Equality Impact Assessment of their strategies and plans.

Disability Discrimination (Amendment) Act 2005

The Act required local authorities to promote equality of opportunity for disabled people by ensuring that their policies, practices, procedures and services do not discriminate against them.

Equality Act 2006

The Act established the Commission for Equality and Human Rights (CEHR) which came into force in October 2007. It brought together as one organisation the CRE, Disability Rights Commission (DRC) and Equal Opportunities Commission (EOC).

Gender Equality Duty 2007 (as required by the Equality Act 2006)

This came into effect in April 2007 and is aimed at public authorities to eliminate unlawful discrimination and harassment and promote gender equality. There is a requirement to produce and publish a gender equality scheme. As part of this, the authorities must assess the impact of their existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

The Equality Act 2010

This Act brought together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act simplifies, strengthens and harmonises the previously existing legislation in order to protect individuals from unfair treatment and promotes a fair and more equal society. The main pieces of legislation that have merged are:

- *Sex Discrimination Act 1975*;
- *Race Relations Act 1976*;
- *Disability Discrimination Act 1995*;
- *Employment Equality (Religion or Belief) Regulations 2003*;
- *Employment Equality (Age) Regulations 2006*;
- *Equality Act 2006, Part 2*; and
- *Equality Act (Sexual Orientation) Regulations 2007*.

Section 149 of the Act introduces a 'general duty' on all public sector bodies to have regard to the following considerations in the exercise of their functions:

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

In seeking to tackle prejudice, promote understanding and advance equality of opportunity for persons who share a relevant 'protected characteristic', public bodies should have regard to:

- removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encouraging persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

Hertsmere's Population

Hertsmere is a mixed urban and rural borough located immediately north of London. The borough has a resident population of approximately 108,000 people and around 42,700 households. The population increased by 7.8% between the 2011 and 2021 Censuses.

Hertsmere is generally an affluent borough, benefiting from high levels of educational attainment and relatively low levels of crime. However, significant inequalities exist between communities and some neighbourhoods experience higher levels of deprivation and socio-economic disadvantage.

The borough has a diverse and growing population. Census data shows that approximately 77% of residents identify as White, 10.5% as Asian or Asian British, 4.8% as Black, Black British, Caribbean or African, and 3.7% as belonging to Mixed or Multiple Ethnic Groups. Hertsmere is also home to one of the largest Jewish communities in the country, with around 17% of residents identifying as Jewish. The borough contains significant Hindu and Muslim communities and is home to Bhaktivedanta Manor, the UK headquarters of the International Society for Krishna Consciousness (ISKCON).

Between 2011 and 2021, the number of residents aged over 65 increased by 17.6%, compared with growth of 7.5% amongst those aged 0-15 and 5.7% amongst those aged 16-64. This has implications for housing needs, health and social care, accessibility and the provision of community infrastructure.

Women comprise approximately 51.9% of the population and men 48.1%. Census 2021 data also highlights the diversity of Hertsmere's communities in terms of religion, ethnicity, sexual orientation and gender identity, demonstrating the importance of ensuring that planning policies support inclusive, accessible and sustainable communities for all residents.

1. Name of project, service or Strategy

Hertsmere Local Plan Regulation 19 Publication 2026

2. Why is this policy needed?

The Regulation 19 Publication Local Plan is the version of the Local Plan that the Council proposes to submit for independent examination. It sets out the Council's spatial strategy, planning policies and site allocations for the plan period. Regulation 19 is a formal publication stage at which representations are invited on the published Plan, including its legal compliance and soundness.

The preparation of a Local Plan is a statutory function under the *Planning and Compulsory Purchase Act 2004* (as amended). Publication is undertaken in accordance with the *Town and Country Planning (Local Planning) (England) Regulations 2012*, including Regulations 19 and 20, and the Council's adopted Statement of Community Involvement.

The Council must also have due regard to the Public Sector Equality Duty under section 149 of the *Equality Act 2010* when exercising its plan-making and publication functions. This EqIA supports that duty by identifying potential differential impacts, opportunities to advance equality, and appropriate mitigation before the Council decides whether to publish the Plan.

The Local Plan is needed to provide an up-to-date framework for meeting housing, employment and infrastructure needs; coordinating growth; supporting sustainable development; and guiding planning decisions.

3. Who may be affected by the proposed policy?

The Regulation 19 Local Plan has the potential to affect all residents, businesses, landowners, workers and visitors within Hertsmere. Impacts will vary by location and by the nature and timing of development.

Groups for whom particular equality considerations may arise include children and young people, older people, disabled and neurodivergent people, families and people who are pregnant or have caring responsibilities, people in housing need or on low incomes, Gypsy and Traveller communities, faith communities, and people whose experience of safety, accessibility or the built environment may differ because of a protected characteristic.

The Plan also affects people living close to allocated development sites and communities that rely on local schools, healthcare, transport, open space and other social infrastructure.

4. What are the key aims of the proposed policy?

The key aims of the Regulation 19 Local Plan are to:

- establish a clear spatial strategy for the location, scale and type of development across Hertsmere;
- meet identified housing needs, including genuinely affordable housing and accommodation for groups with particular or specialist needs;
- support regeneration and economic opportunity, particularly in Borehamwood and Potters Bar;
- secure timely infrastructure and social and community facilities alongside planned growth;
- promote inclusive, accessible, safe and high-quality design;
- improve access to services, employment, public transport, walking, cycling and wheeling networks;
- protect and enhance environmental, heritage and green infrastructure assets; and
- provide a clear and effective framework for decision-making and delivery over the plan period.

Unlike Regulation 18, the Regulation 19 document contains the Council's proposed strategy, policies and allocations for submission, subject to consideration of representations and the subsequent examination process.

5. Impact of the policy		
Equalities Groups	Nature of the Impact - Positive, Negative, Neutral	Extent of the impact
Age	<u>Positive</u> •Policy H1 seeks a wider mix of housing and increased supply, including genuinely affordable and family housing, which may improve housing options for younger households and families. •Policy H4 specifically addresses accommodation for older people, including adaptable conventional homes and specialist accommodation in accessible locations. •Policies HQD2 and HQD6 promote inclusive, accessible and adaptable homes and places, while SCI1 seeks timely delivery of health, education and community infrastructure. <u>Potential negative</u> •Growth may increase pressure on schools, healthcare, open space and other age-sensitive services if infrastructure is not delivered in step with development. •Construction and changes to familiar local environments may have greater temporary effects on some older people, children and young people. <u>Assessment</u> •Age is highly relevant to the Plan. The overall effect is expected to be positive, subject to infrastructure phasing and implementation of the Plan's housing, design and community infrastructure policies. •The principal risks identified relate to infrastructure delivery and construction impacts rather than the strategy itself. The Plan already contains policies on community infrastructure, accessible design, housing mix and specialist accommodation for older people. Consequently, no further plan-level mitigation is considered necessary beyond effective implementation, monitoring and infrastructure phasing.	High
Disability	<u>Positive</u> •Policy HQD2 requires inclusive and accessible design and specifies that at least 10% of new dwellings meet Building Regulation M4(3) wheelchair-user standards, with remaining dwellings meeting M4(2) accessible and adaptable standards. •Policies H4 and H5 support accommodation for older people and people requiring supported or specialised accommodation, while HQD6 requires high-quality, inclusive and adaptable housing. •Policies on public realm, movement and community infrastructure create opportunities to improve step-free access, legibility and access to services. <u>Potential negative</u> •Construction, changes to routes or poorly phased development could temporarily reduce accessibility, particularly for people with mobility, sensory or cognitive impairments. •Historic environments and constrained sites can create accessibility challenges if inclusive design is considered too late. <u>Assessment</u> •Disability is highly relevant to the Plan. The Plan contains strong positive requirements and specific design standards; identified risks should be addressed through inclusive design, phasing and implementation. •The Plan already includes specific requirements for accessible and adaptable housing, wheelchair-user dwellings, and inclusive design. The identified risks arise largely from implementation and	High

	construction activity rather than from the Plan's overall strategy. Existing policy requirements, together with development management processes, are considered sufficient to address these matters.	
Sex	<u>Positive</u> •Policy HQD2 requires inclusive and safe design and recognises that different groups experience the built environment differently, including women and girls. It promotes visibility, lighting, natural surveillance, legible routes and welcoming public spaces. •Improved access to housing, employment, community facilities and transport may benefit people of all sexes. <u>Potential negative</u> •Poorly designed routes, public spaces or transport connections could have differential safety impacts, including for women and girls, particularly at night. <u>Assessment</u> •The Plan provides a positive framework for addressing these issues through inclusive and safe design. No medium or high residual adverse impact has been identified. •No additional mitigation is required.	Medium
Gender reassignment	<u>Positive</u> •The Plan promotes inclusive communities, equitable access and safe, welcoming places through Policy HQD2 and related design policies. <u>Potential negative</u> •No specific adverse land-use planning impact has been identified. Individual experiences of safety and inclusion should continue to be considered through inclusive design and community engagement. <u>Assessment</u> •Low direct impact identified at Plan level, with a generally positive inclusive-design framework. •No additional mitigation is required.	Low
Marriage / civil partnership	<u>Positive</u> •A wider choice of housing sizes and tenures may benefit households in different forms, including couples and families. <u>Potential negative</u> •No specific differential adverse planning impact has been identified. <u>Assessment</u> •Low direct impact identified. •No additional mitigation is required.	Low
Pregnancy and maternity	<u>Positive</u> •Housing mix, family housing, accessible public realm and provision for healthcare, childcare, open space and community facilities may benefit pregnant people and families with babies and young children. •Policies HQD2, SCI1 and SCI4 support accessible environments and social infrastructure relevant to families. <u>Potential negative</u> •Pressure on healthcare, childcare and other services could arise if infrastructure is not delivered in step with housing growth.	Medium

	•Construction activity and temporary route changes may create additional accessibility difficulties for people with pushchairs or reduced mobility. Assessment •The overall effect is expected to be positive where infrastructure and accessibility requirements are delivered alongside growth. •No additional mitigation is required.	
Race	Positive •The Plan seeks inclusive and mixed communities and improved access to housing, employment and services. •Policy H8 responds specifically to identified accommodation needs of Gypsy and Traveller communities and seeks safe, suitable and well-serviced provision with access to education, healthcare and community facilities. Potential negative •The spatial distribution of growth and infrastructure may affect communities differently by location. There is also potential for barriers to participation where information is not accessible to people whose first language is not English. Assessment •The Plan includes positive provisions, particularly for Gypsy and Traveller accommodation. Localised impacts and participation should continue to be monitored. •No additional mitigation is required.	Medium
Religion or belief	Positive •Policy SCI1 identifies faith groups among the partners relevant to planning social and community infrastructure and safeguards facilities needed by communities. •The Plan also provides for community facilities and burial space, which may support a range of faith and belief groups. Potential negative •Growth may increase demand for community, faith and burial facilities, and redevelopment could affect existing facilities if they are not appropriately safeguarded or replaced. Assessment •The Plan provides mechanisms to safeguard and secure community infrastructure. No medium or high residual adverse impact has been identified. •No additional mitigation is required.	Medium
Sexual orientation	Positive •The Plan promotes mixed, inclusive and safe communities and equitable access to housing, services and public space. Potential negative •No specific differential adverse land-use planning impact has been identified at Plan level. Assessment •Low direct impact identified, with positive inclusive-design provisions. •No additional mitigation is required.	Low
Socio-economic disadvantage*	Positive •Policies H1 and H3 seek increased housing supply and genuinely affordable housing, with a strong emphasis on social rent and mixed tenures.	High

	•Regeneration, employment policies and improved transport and social infrastructure may improve access to jobs, services and opportunities. •Tenure-blind and tenure-neutral design requirements seek to avoid inferior environments or facilities for affordable housing residents. Potential negative •Development and regeneration can create unequal local impacts, including construction disruption, pressure on services and changes in housing or land values. •Some communities may be more dependent on public transport, local services and affordable community infrastructure and therefore more affected by delays in delivery. Assessment •Socio-economic effects are highly relevant. The Plan contains substantial positive measures, but delivery of affordable housing and infrastructure should be monitored closely. •The Plan's strategy contains significant positive measures, including affordable housing requirements, mixed communities, economic growth and infrastructure provision. Potential adverse effects are largely dependent on delivery and market conditions rather than policy intent. Ongoing monitoring of affordable housing and infrastructure delivery is therefore considered an appropriate and proportionate response.	
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* Socio-economic disadvantage is not a protected characteristic under the Equality Act 2010, but is included in accordance with the Council's EqIA approach.

6. What steps have you taken or plan to take to consult the whole community or specific groups affected by the service or policy development?

The substantive assessment above relates to the Regulation 19 Local Plan itself. The Regulation 19 publication arrangements also have equality implications and are addressed in more detail through the Council's Regulation 19 Publication Programme.

The publication process will be digital-first but not digital-only. The proposed measures include:

- Commonplace as the main online representation platform, with email and postal routes also available;
- hard-copy inspection documents at deposit locations;
- a clear information video with captions and a transcript;
- accessible web content and accessible PDFs or HTML alternatives where reasonably practicable;
- large-print, alternative-format or translated material on request where reasonable and proportionate; and
- telephone and email contact routes for people who need procedural or accessibility assistance.

The Council does not propose in-person Regulation 19 events because this is a formal publication and representations stage rather than a further issues-and-options consultation.

7. What are the sources of data/information used to inform the assessment?

The assessment has been informed by the Regulation 19 Publication Local Plan and the evidence used to prepare it, including:

- the Regulation 18 Consultation Statement and representations received in 2026;
- the Sustainability Appraisal and other assessment work accompanying the Local Plan;
- the Hertsmere Local Housing Needs Assessment (2026), including evidence on housing mix, affordable housing and specialist accommodation;
- the Gypsy and Traveller Accommodation Assessment (2026);
- the Infrastructure Delivery Plan and evidence on education, health, community and other infrastructure;
- Census and Office for National Statistics data and other demographic evidence;
- Settlement Vision evidence and engagement undertaken during preparation of the Plan;
- the Council's Statement of Community Involvement and Regulation 19 Publication Programme;
- national planning policy and guidance; and
- the Equality Act 2010, including the Public Sector Equality Duty.

The assessment is proportionate to the strategic nature of the Local Plan and focuses on potential differential impacts and the mechanisms within the Plan for avoiding, mitigating or addressing them.

8. Please explain how and when the actual equality impacts of the Local Plan will be reviewed and monitored.

Equality impacts will continue to be considered through the remaining plan-making stages. Representations received at Regulation 19 that raise equality issues will be reviewed before submission and through examination. If proposed Main Modifications or other material changes alter the equality implications of the Plan, the EqIA should be reviewed and updated as necessary before adoption.

Following adoption, implementation will be monitored through the Authority Monitoring Report and relevant service and evidence-base monitoring. Particular matters of relevance include housing and affordable housing delivery, accessible and adaptable homes, specialist accommodation, Gypsy and Traveller provision, social and community infrastructure, and the delivery and phasing of major site allocations.

Where monitoring or subsequent evidence identifies an unforeseen or disproportionate adverse effect, this should inform implementation measures and future review of the Local Plan or associated policies.

9. Does the EqIA indicate that the strategy would have a medium or high negative impact on one or more equality groups?

No. The assessment identifies potential localised or implementation-related adverse effects, particularly where infrastructure or accessibility measures are not delivered in step with growth. However, the Regulation 19 Plan contains specific policies intended to avoid or mitigate these effects and includes significant positive provisions for accessible housing and design, affordable and specialist housing, Gypsy and Traveller accommodation, and social and community infrastructure. No medium or high residual negative impact on an equality group has been identified at Plan level.

10. Sign off

Name	Role (i.e. Project Sponsor, Head of Service)	Date
Matt Kolaszewski 	Head of Service (Acting)	5 October 2026