

Equality Impact and Needs Analysis of the Publication Local Plan (Regulation 19)

Planning

9 June 2023

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Environment and Community Services
Service Area	Planning Policy and Design
Service/policy/function being assessed	Richmond Local Plan
Which borough (s) does the service/policy	Richmond
apply to	
Staff involved in developing this EINA	Oisín Cotter
Date approved by Directorate Equality	N/A
Group (if applicable)	
Date approved by Policy and Review	21/03/2023
Manager	
All EINAs must be signed off by the Policy	
and Review Manager	
Date submitted to Directors' Board	21/03/2023

1. Summary

Please summarise the key findings of the EINA.

The Council's new Local Plan will set out policies and guidance for the development of the borough over the plan period of 2024 to 2039. The new Local Plan, with a key focus on tackling the climate change and 'living locally', will also protect and enhance other aspects of life in Richmond - its culture, community, heritage and character, open space, quality parks, schools, neighbourhood character and thriving small businesses. Public consultation on Pre-Publication version (Regulation 18) was carried out from 10 December 2021 to 31 January 2022. Following review of the comments received and supported by updates to evidence base underpinning the Plan, a Publication version of the Local Plan (Regulation 19) has been prepared.

The policies within the Local Plan promote equality and inclusivity for all. This assessment has identified several positive impacts for the various protected characteristics. Overall, a number of protected characteristics will benefit from the focus on 'living locally', providing access for daily needs for all as part of the 20-minute neighbourhood concept as well as the policy on sustainable travel choices, with its focus on walking and cycling. Children and younger people benefit from policies enhancing open spaces and play spaces, encouraging an active and healthy lifestyle, as well as the promotion of leisure and cultural facilities. Separately, the focus on maximising housing delivery, including affordable housing, will benefit younger and lower-income groups. The elderly population are more susceptible to health issues and likely to suffer from social isolation, therefore benefitting from policies which improve the standards of Community and Social Infrastructure, Health and Wellbeing and protect open spaces and local shops and services, such as in our town, local and neighbourhood centres and shopping parades. Disabled residents benefit from Local Plan policies guaranteeing specialist housing, accessible and inclusive urban design and disabled parking spaces. Certain groups at increased risk of hate crime and harassment are considered to benefit from a strong focus on improving safety and designing out crime prevalent in the design policies and policies on artificial and security lighting. Pregnant women and those on maternity are considered to benefit from policies regarding the accessibility of transport and ensuring a mix of housing types and sizes.

The supporting text of LP44 'Design Process' has been amended to explicitly encourage developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit different protected groups in their consideration in development proposals and allow them to input their discrete needs.

Inevitably there are aspects of the Local Plan's policies that could possibly have a negative impact on some protected groups. There is a risk that community facilities could be priced out by other uses which have higher land values, to the detriment of young people, older residents and religious groups. Higher land values could also pose a risk to providing sufficient affordable housing to meet the borough's needs. There is also potential for minor conflict between preserving the features of heritage assets and the need to make adaptations to buildings to meet the needs of disabled residents and providing access for all. Appropriate mitigation measures have been listed in this assessment to prevent any of these issues from having a significant impact on the protected groups.

2. Evidence gathering and engagement

a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
National data	Census, National LGBT Survey, ONS
Local data	DataRich, Data.London

b. Who have you engaged and consulted with as part of your assessment?

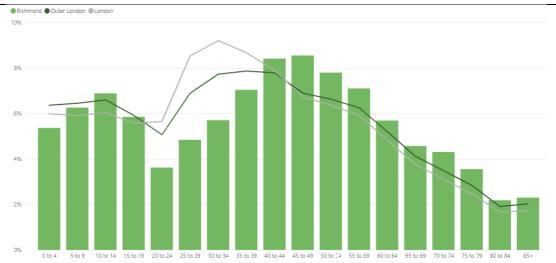
Individuals/Groups	Consultation/Engagement results	Date	What changed as a result of the consultation
Public at large as part of	Comments were received from 311	10	Several policies have been
consultation on Reg 18	respondents, and these have	December	amended to include
version of the Plan.	influenced amendments to the Plan	2021 to	additional consideration of
	for the Reg 19 version.	31	the needs of protected
		January	groups.
		2022	

3. Analysis of need

Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion

Protected	Findings
group	

Age



Population Data:

• There are 39,447 people aged 15 and under, representing 20.2% of the borough's population. There are 31,447 people aged 65 and over, representing 16.1% of the borough's population. The median age of the borough is 41 years, the highest of London boroughs along with LB Bromley.

- Richmond has the lowest prevalence of childhood obesity in London and is
 well below the average for England. The Local Plan will continue to support
 and encourage a healthy and active lifestyle by protecting green spaces and
 encouraging active transport, particularly cycling and walking. This will be
 achieved through policies on Living Locally, sustainable travel choices, green
 infrastructure, urban greening, sport and recreation as well as play-space
 policies, all of which will be of benefit to young people and the elderly in
 particular.
- Living Locally policies will also benefit children by facilitating more independence and increased safety due to lower traffic levels and more 'eyes on the street'.
- Richmond borough has one of the highest proportions of elderly residents in London, and this will only increase as a result of improvements to life expectancy. There is likely to be an increase in need of specialist housing options due to higher levels of disability and health issues amongst older people, as well as greater accessibility on our highstreets. The urban design and living locally policies, together with policies seeking improvements to high streets and creating sustainable travel choices (including the work of the Council's Local Implementation Plan) will also be of benefit.
- Over a third of people aged over 65 are living alone across the country, which
 increases the risk of social isolation. The Local Plan will continue to enhance
 social infrastructure and ensure buildings consider the need for flexible use
 where possible to hold community events, thus encouraging social
 interaction. The Living Locally policies will benefit older people living alone by
 consolidating everyday needs close to where people live that can be reached
 easily by walking or public transport, which will also increase opportunities for
 social interaction.

- Regarding business and jobs, the policies seek to protect offices, industrial land and in general they promote jobs and the local economy; they will also help to ensure affordable workspaces are available, which will particularly benefit SMEs and start-ups. In addition, we will encourage greater economic floorspace and flexible working areas, which will benefit young entrepreneurs by making operating a business more affordable and convenient.
- The median price of Richmond's property is much higher than the London average. To support those unable to afford to rent or buy in the borough, the Council will do everything in its power to make sure over the plan period we hit the 50% affordable housing target. This will support many protected characteristics, particularly those on no or low incomes. Housing policies that target a mix of property types will help cater for households of all different sizes.

Source: https://www.datarich.info/

Disability

Population Data:

• Census 2021 indicates that 12.9% of the borough state their day-to-day activities are limited due to disability under the Equality Act. This is broken down into 4.8% of people whose activities are limited a lot and 8.1% whose activities are limited a little.

Findings:

- Disabled residents generally have specialist housing needs, which have been considered in the Local Housing Needs Assessment and offering mixed housing. It is important to also ensure housing built is accessible, adaptable, and wheelchair user friendly, ensuring adequate supply in the process.
- Policies that aim to promote and protect social and community infrastructure will benefit people with disabilities in facilitating spaces that provide for the needs of this group.
- The Living Locally policies acknowledge the barriers for people with reduced mobility and ensures that development consider their needs and enhance accessibility. The Plan prioritises the retention and enhanced provision of disabled parking spaces.
- Employment policies that protect and promote local jobs will benefit this group, that experiences disproportionate economic inactivity due to barriers to entering the workforce, through greater access to workspaces and facilities by encouraging mixed-use developments.
- Transport policies of the Local Plan together with other Council initiatives, such as the Council's Local Implementation Plan, will continue to set out how the borough will improve provisions for disabled residents to access public transport.

Source: https://www.datarich.info/

Sex

Population Data:

• The borough's gender split is recorded in the 2021 census to be 48% men and 52% women. The population of women increased twice as much (6%) as the rate of men (3%) since the previous census in 2011.

Findings:

- Women are more likely to require multiple stops on a single journey to
 complete errands, known as trip-chaining, than men due to a more prevalent
 role in childcaring and homemaking. As a result, women are generally more
 reliant on public transport, walking, and cycling as they are less likely to own
 private cars. The Plan's emphasis on living locally aims to reduce the need to
 make several trips to different parts of the borough by consolidating everyday
 needs close to where people live and work which will predominantly benefit
 women.
- The Plan's Design policies incorporate the Secured by Design scheme which
 encourages applicants to engage with the Metropolitan Police to design out
 crime and reduce opportunities for antisocial behaviour which would benefit
 women by increasing safety and reducing targeted harassment. The
 floodlighting and external artificial lights policy focuses also on safety lighting.
- Design policies also encourage developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.

Source: https://www.datarich.info/

Gender reassignme nt

Population Data:

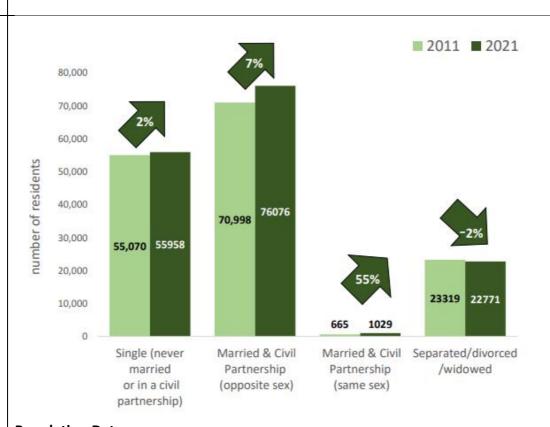
- Census 2021 asked about people's gender identity for the first time. It recorded that 0.39% of the borough have a different gender identity from sex assigned at birth. This is the lowest rate in London.
- It is known that the Trans community experience disproportionate levels of discrimination. A National LGBT Survey conducted by the Government Equalities Office highlighted a number of concerns regarding safety. Over half of trans respondents admitted that they tried not to be openly trans because of how people behave towards them.

- The policy on improving the community infrastructure and spaces states that
 the Council will work to ensure that adequate, high quality social and
 community facilities and services are developed and/or modernised to meet
 the changing needs of the community.
- The Plan's Design policies incorporate the Secured by Design scheme which
 encourages applicants to engage with the Metropolitan Police to design out
 crime and reduce opportunities for antisocial behaviour which would benefit
 trans individuals by increasing safety and reducing targeted harassment. The
 floodlighting and external artificial lights policy focuses also on safety lighting.
- Design policies also encourage developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.



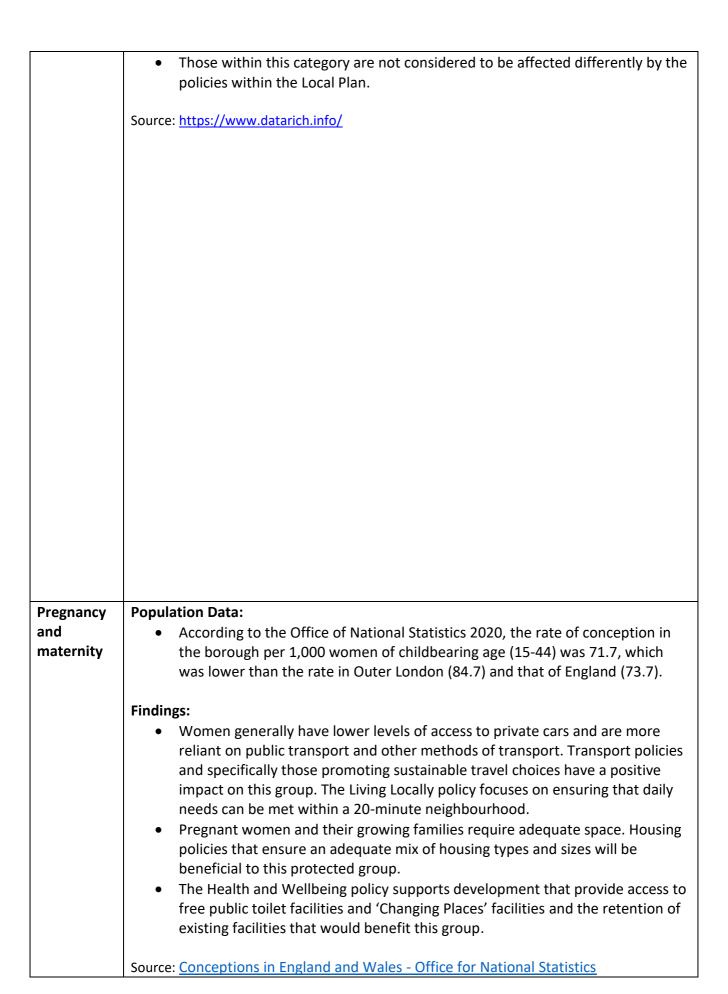
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_d ata/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf

Marriage and civil partnership



Population Data:

- 49.5% of the borough population were recorded as being married or in a civil partnership in the 2021 Census. This was the third highest of all London boroughs behind Harrow (53.9%) and Redbridge (51.1%).
- There was a 55% increase in the number of same-sex legal partnerships since the 2011 Census, accounting for the introduction of same-sex marriage in 2014.



Race/ethni city

Population Data:

Census 2021 has recorded the following ethnic breakdown of the borough:

- White British 63%
- White Other 14.7%
- Indian 3.7%
- Other Asian 2.5%
- White Irish 2.5%
- Chinese 1.4%
- Other Ethnic Group 2.4%
- White and Asian 2.2%
- Other Mixed Ethnic Group 1.8%
- African 1.2%
- Pakistani 0.9%
- Arab 0.9%
- White and Black Caribbean 0.8%
- White and Black African 0.6%
- Bangladeshi 0.5%
- Caribbean 0.5%
- Roma 0.2%
- Black Other 0.1%
- White Gypsy or Irish Traveller 0.0004%

- There is a significant difference between employment rates of different racial groups. 83.7% of the white population are employed, compared to 71% of ethnic minorities. Ethnic minorities generally have lower income levels than their white counterparts. This has several implications in terms of policy and the needs of BAME people. Policies that encourage the creation of jobs have a positive impact on BAME people with higher rates of unemployment.
- BAME people are generally on a lower income and therefore benefit from Housing Policies that require affordable housing, including 50% affordable housing requirement as well as seeking affordable housing contributions from small sites.
- Ethnic minorities are more likely to have issues accessing suitable housing and to have overcrowded homes due to living with extended family. Housing policies in the Local Plan seek to ensure an adequate mix of Housing types and sizes across the borough and will provide benefits for BAME residents.
- Policies on Housing Needs for Different Groups will ensure that people from gypsy and traveller communities have access to culturally-sensitive accommodation by protecting the existing halting site and setting out criteria for new temporary or permanent sites.
- The policy on improving the community infrastructure and spaces states that the Council will work to ensure that adequate, high quality social and community facilities and services are developed and/or modernised to meet the changing needs of people from different ethnic and cultural backgrounds.

- The Plan's Design policies incorporate the Secured by Design scheme which
 encourages applicants to engage with the Metropolitan Police to design out
 crime and reduce opportunities for antisocial behaviour which would benefit
 people from a minority ethnic background by increasing safety and reducing
 targeted harassment. The floodlighting and external artificial lights policy
 focuses also on safety lighting.
- Design policies also encourage developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.

Source: https://www.datarich.info/

Religion and belief, including non belief

Population Data:

Census 2021 has recorded the following religious breakdown of the borough:

- Christian 45.3%
- No Religion 37.9%
- Muslim 4.3%
- Hindu 2.1%
- Sikh 1%
- Buddhist 0.8%
- Other religion 0.7%
- Jewish 0.6%
- Gave no answer 7.1%

Richmond has the third highest rate of people with no religion in London behind the City of London (43.8%) and Islington (40.8%).

Findings:

The policy on improving the community infrastructure and spaces states that
the Council will work to ensure that adequate, high quality social and
community facilities and services are developed and/or modernised to meet
the changing needs of the community, such as mixed-use developments. This
will have a positive impact on faith groups as this policy encompasses faith
facilities and religious meeting places.

Source: https://www.datarich.info/

Sexual orientation

Population Data:

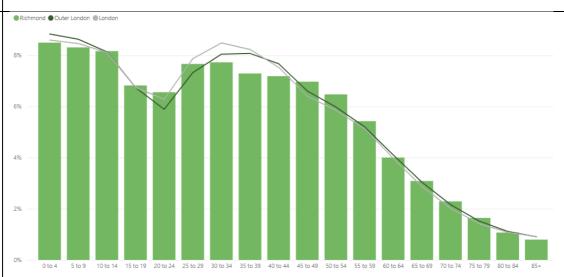
- Census 2021 asked about people's sexual orientation for the first time. It recorded that 3.36% of the borough identify as gay, lesbian, bisexual, or another sexual minority. This is the third highest in Outer London boroughs behind Walthom Forest (4.52%) and Kingston-upon-Thames (3.43%).
- A National LGBT Survey was conducted by the Government Equalities Office: 4 out of 10 respondents said they'd had a bad experience outside their home in the last 12 months because they were LGBT and Over 2 thirds of the respondents said they didn't hold hands with their partner in public because they were frightened about what people might say.

- The policy on improving the community infrastructure and spaces states that the Council will work to ensure that adequate, high quality social and community facilities and services are developed and/or modernised to meet the changing needs of the community.
- The Plan's Design policies incorporate the Secured by Design scheme which
 encourages applicants to engage with the Metropolitan Police to design out
 crime and reduce opportunities for antisocial behaviour which would benefit
 LGBTQ people by increasing safety and reducing targeted harassment. The
 floodlighting and external artificial lights policy focuses also on safety lighting.

 Design policies also encourage developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.

Source: https://www.datarich.info/

Across groups i.e older LGBT service users or Black, Asian & Minority Ethnic young men.



Population Data:

• The above graph shows the age distribution of Black, Asian, and a Minority Ethnic background in the borough compared with other Outer London boroughs and Greater London. The borough has a lower percentage of people of the global majority aged 30-45 in comparison to other London boroughs. This is in contrast to white residents, where there is a lower percentage of 20–35-year-olds compared to other London Boroughs.

- Affordable Housing policies will benefit adult BAME residents who may be priced out of the borough. The Plan is targeting 50% of all new housing to be Affordable Housing.
- The Plan's Design policies incorporate the Secured by Design scheme which
 encourages applicants to engage with the Metropolitan Police to design out
 crime and reduce opportunities for antisocial behaviour which would benefit
 people from minority religious backgrounds by increasing safety and reducing
 targeted harassment. The floodlighting and external artificial lights policy
 focuses also on safety lighting.
- Young boys can dominate play areas and parks designed for young people that can alienate young girls from freely engaging in play. Policies on open space,

play and recreation encourage engagement with the local community and particularly local children in the design of new play spaces.

Source: https://www.datarich.info/; Make Spaces for Girls Annual Research Report 2023 63f60a5a2a28c570b35ce1b5 Make Space for Girls - Research Draft.pdf (website-files.com)

Data gaps

Data gap(s)	How will this be addressed?
Some borough-level intersectional data that cuts	Using national data and trends
across different groups.	

4. Impact

Protected group	Positive	Negative
Age	 People of all age groups will benefit from the Housing Needs of Different Groups policy section, where high standards of accessibility and inclusivity need to be met, and adaptions to changing circumstances need to occur quickly. Policies that encourage development and provision of affordable housing have a positive impact on people on no and low incomes, due to increased housing demand. This could also be younger age groups. Policies on tackling the climate emergency, such as reducing waste and adopting a more Circular Economy, will have a positive impact on all age groups, but in particular on the elderly and children, as it ensures development proposals do not have detrimental effects on resident's health. The policies on town and local centres as well as on living locally, will benefit several age groups. Younger residents benefit from more education, training, social and leisure facilities e.g. youth clubs and job opportunities more locally. Similarly, community facilities that are accessible and have good transport links have a positive impact on the elderly, 	 The policies on protecting the borough's heritage sites could be of detriment to the elderly, as a lot of heritage sites are very old, and sometimes do not cater for people with mobility issues. The Council will have to ensure that they balance the needs of the elderly with preserving heritage sites. The Local Plan acknowledges that there is a high value on land in Richmond. It is vitally important in this context to ensure community facilities are not priced out by other uses which have higher land values, to the detriment of young and older residents that rely on them. In addition, the council must ensure that proper affordable housing is available and provided to meet the 50% target, as this would otherwise be detrimental to young people and those on no or low incomes. In order to mitigate these risks, the Council should ensure the existing Infrastructure Delivery Plan is regularly reviewed and updated and monitored closely to keep track of current stock of social and community facilities. The Council can also seek section 106 planning obligations to ensure proposed developments meet demand on existing community infrastructure and services.

- encouraging community events and thus reducing social isolation.
- Policies protecting the borough's green spaces have a positive impact on children and young people in regard to physical health, wellbeing and development, but also families when using play areas.
- Transport policies, particularly on sustainable travel choices, ensure that public transport is widespread and accessible, as well as encourage healthier methods such as walking and cycling, are beneficial to the elderly population.

Disability

- The living locally policy as well as the town centres policies that focus on providing community facilities and services that are accessible and have good transport links have a positive impact on disabled residents.
- Policies on play areas have a positive impact on this group as play spaces are designed to be inclusive and provide facilities for children of all abilities.
- Housing Needs of Different Groups has a positive impact on disabled people as it states that housing must be designed to be inclusive and accessible to all. New buildings must be well insulated and ventilated to avoid any health problems as a result of damp, heat and cold.
- The living locally policy has a positive impact on people with mobility issues who would benefit from having a variety of facilities and services within close proximity to meet their daily needs.
- Transport policies, particularly on sustainable travel choices, are beneficial to people with mobility issues as they are more accessible, and it allows residents to access town centres more conveniently.
- The Design Process policy encourages developers to engage in early consultation with less frequently heard groups and those often

- The policies on Heritage Sites seeks to conserve features that contribute to the Heritage Asset or Historic Environment's significance and character. There is potential that there may be a clash between upholding this part of the policy and the need to make adaptations to Listed Buildings in order to meet the needs of disabled people e.g. ramps. The chances of this are low and the council officer assigned to the planning application can exercise their discretion if this was to occur.

	underspresented in the planning
	underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.
Sex	 Women, who most often have caring responsibilities for children, would benefit from accessibility of developments and good local transport links. Policies promoting jobs and local employment opportunities will have a positive impact on women who often have caring responsibilities and may need to work part time, as well as close to home. Transport policies, particularly on sustainable travel choices, that ensure public transport is widespread and accessible have a positive impact on women with childcare responsibilities who are less likely to have access to a car and rely on public transport. The Urban Design policies have a positive impact on women who experience disproportionate levels of discrimination. It promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, which will help women feel safer in the borough, particularly at night-time. The Design Process policy encourages developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.
Gender	- The Urban Design policies have a - There are certain groups that are at a
reassignment	positive impact on LGBT people who experience disproportionate levels of discrimination. It promotes safety and accessibility and asks that developers minimise opportunities for crime and higher risk of hate crimes, harassment and attacks, including the LGBTQ community. The Council needs to ensure that the policies set out in Local Character and Design Quality are

	antisocial behaviour, which will help	implemented with regard to ensuring
	LGBT people feel safer in the borough, particularly at night-time. - The Design Process policy encourages developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.	anti-social behaviour and crime is prevented as much as possible.
Marriage and civil partnership	- Those within this category are not considered to be affected differently by the policies within the Local Plan.	 Those within this category are not considered to be affected differently by the policies within the Local Plan.
Pregnancy and maternity	 The Housing policies have generally a positive impact on people within this category as developers are encouraged to provide a range of home sizes, beneficial to a person with a family that may need a larger home. The sustainable travel choices as well as living locally policies are beneficial to pregnant women as they ensure daily needs can be met close to home and do not require long distance travel. Policies requiring increased access to free public toilet facilities and 'changing places' facilities will benefit pregnant women and new parents. 	- Those within this category are not considered to be affected differently by the policies within the Local Plan.
Race/ethnicity	 The Design Process policy encourages developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs. The Urban Design policies have a positive impact on people from minority ethnic backgrounds who experience disproportionate levels of discrimination. It promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, which will help BAME people 	- There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including ethnic minorities. This could be an issue with new developments if a commitment to safety features isn't followed through i.e. by providing security features, well-lit walking routes and good surveillance. To mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through.

feel safer in the borough, particularly at	
night-time.	

- Policies that encourage the creation of more homes at an affordable cost have a positive impact on people from BAME backgrounds who are generally on lower incomes.
- The introduction of more community facilities will benefit different groups, as each has differing needs and this policy encourages adequate provision of services.
- The Housing Mix and Standards policy has a positive impact on BAME people as it encourages housing developments to provide a range of dwelling sizes. For example, Asian families are more likely to live in an extended family unit so would require more space.
- BAME people will benefit from training, apprenticeship opportunities and local employment opportunities in the Employment policies section.

Religion and belief, including non belief

- The policies on social infrastructure as well as living locally are likely to have a positive impact across different faith groups.
- The Design Process policy encourages developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.
- The Local Plan acknowledges that there is a deficiency in terms of community facilities. There is a risk that community facilities could be priced out by other uses which have higher land values, to the detriment of religious groups that are dependent on these facilities. In order to mitigate this risk, the Council should ensure the Infrastructure Delivery Plan is regularly updated and monitored closely to keep track of current stock of social and community facilities. The Council can also seek section 106 planning obligations to ensure proposed developments meet demand on existing community infrastructure and services.
- There are certain groups that are at a higher risk of hate crimes, harassment, and attacks, for example including Muslims. This could be an issue with new developments if a commitment to safety features isn't followed through i.e. by providing security features, well-lit walking routes and good surveillance. To

		mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through.
Sexual orientation	- The Urban Design policies have a positive impact on LGBT people who	- There are certain groups that are at a higher risk of hate crimes, harassment
orientation.	experience disproportionate levels of discrimination. It promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, which will help LGBT people feel safer in the borough, particularly at night-time. The Design Process policy encourages developers to engage in early consultation with less frequently heard groups and those often underrepresented in the planning process. This will benefit this group in their consideration in development proposals and allow them to input their discrete needs.	and attacks, including the LGBTQ community. The Council needs to ensure that the policies set out in Local Character and Design Quality are implemented with regard to ensuring anti-social behaviour and crime is prevented as much as possible.

5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Council to ensure the existing Infrastructure Delivery Plan is regularly updated	Local Plan	Ongoing
and monitored closely to keep track of current stock of social and community facilities.	team	

6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation
Consultation on the Regulation 19 version of the Plan will take place subject to approval of the draft at Committee in April 2023. This consultation will gather views from the public as to the soundness of the plan in line with paragraph 16 of the National Planning Policy Framework (NPPF).	May 2023