

Equality, Diversity, Cohesion and Integration Screening



As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration.

A **screening** process can help judge relevance and provides a record of both the **process** and **decision**. Screening should be a short, sharp exercise that determines relevance for all new and revised strategies, policies, services and functions.

Completed at the earliest opportunity it will help to determine:

- the relevance of proposals and decisions to equality, diversity, cohesion and integration.
- whether or not equality, diversity, cohesion and integration is being/has already been considered, and
- whether or not it is necessary to carry out an impact assessment.

Directorate: City Development	Service area: Forward Planning and Implementation
Lead person: Nasreen Yunis	Contact number: 2478133

1. Title: Policy H5 Affordable Housing of the Submission Core Strategy (December 2013)

Is this a:

Strategy / Policy

 Service / Function

 Other

If other, please specify

2. Please provide a brief description of what you are screening

The Core Strategy is a district wide strategy for the entire Leeds Metropolitan District and the development of the strategy. This screening is in relation to affordable housing policy H5 which sets out the planning policy for the affordable housing. Policy H5 cannot however be seen in isolation but within the context of the Core Strategy process and consultation held, therefore an overall strategic overview is provided of the Core Strategy and its process so far, section 4 then goes into more detail in relation to Policy H5. The potential changes which this Executive Board examines are the impact of setting thresholds and targets for affordable housing in the Core Strategy (until 2028). The Council's submission Core Strategy, as part of the Local Development Framework, has recently been the subject of Independent Examination, with the main block of Hearing sessions in October 2013. Within this context, Core Strategy Policy H5 sets out the approach to affordable housing. This currently advocates the use of a Supplementary Planning Document (SPD) to set

thresholds and targets for the delivery of affordable housing. Since that time the Inspector was written to the Council and given a view that affordable housing targets and thresholds should be set out in the Core Strategy and not in a SPD.

A screening document was produced for the Publication draft of the Local Development Framework (LDF) Core Strategy. This screening complements that EIA Screening, as it screens new changes to the Core Strategy following a 6 week period of public consultation. The Core Strategy Publication Draft underwent public consultation commencing 28th February to 12th April 2012. In line with the LDF regulations, this was a targeted stage of consultation, with emphasis upon requesting responses in relation to the 'soundness' of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including;

- Equality Impact Assessment Screening
- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& non technical summary)
- Habitats Regulations Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of consultation on Preferred approach (Oct- Dec 2009)

Links were also incorporated to the consultation web page to the evidence based material, which has been prepared to help inform the emerging document. The publication draft Presubmission Core Strategy also underwent further public consultation from 7 January to 18th February 2013.

3. Relevance to equality, diversity, cohesion and integration

All the council's strategies/policies, services/functions affect service users, employees or the wider community – city wide or more local. These will also have a greater/lesser relevance to equality, diversity, cohesion and integration.

The following questions will help you to identify how relevant your proposals are.

When considering these questions think about age, carers, disability, gender reassignment, race, religion or belief, sex, sexual orientation and any other relevant characteristics (for example socio-economic status, social class, income, unemployment, residential location or family background and education or skills levels).

Questions	Yes	No
Is there an existing or likely differential impact for the different equality characteristics?	x	
Have there been or likely to be any public concerns about the policy or proposal?	x	
Could the proposal affect how our services, commissioning or procurement activities are organised, provided, located and by whom?		x
Could the proposal affect our workforce or employment practices?		x
Does the proposal involve or will it have an impact on <ul style="list-style-type: none"> • Eliminating unlawful discrimination, victimisation and harassment • Advancing equality of opportunity • Fostering good relations 	x	

If you have answered **no** to the questions above please complete **sections 6 and 7**

If you have answered **yes** to any of the above and;

- Believe you have already considered the impact on equality, diversity, cohesion and integration within your proposal please go to **section 4**.
- Are not already considering the impact on equality, diversity, cohesion and integration within your proposal please go to **section 5**.

4. Considering the impact on equality, diversity, cohesion and integration

If you can demonstrate you have considered how your proposals impact on equality, diversity, cohesion and integration you have carried out an impact assessment.

Please provide specific details for all three areas below (use the prompts for guidance).

- **How have you considered equality, diversity, cohesion and integration?** (think about the scope of the proposal, who is likely to be affected, equality related information, gaps in information and plans to address, consultation and engagement activities (taken place or planned) with those likely to be affected)

The preparation of the Core Strategy has been undertaken within the context of the LDF

Regulations (and SEA Directive) (Strategic Environmental Assessment Directive) and the City Council's adopted Statement of Community Involvement (SCI). Integral to this process also has been the preparation of a Sustainability Appraisal at key stages to review the emerging plan in relation to a series of economic, social and environmental objectives. Equality, diversity, cohesion and integration issues have therefore been central to this overall approach.

The Core Strategy is a district wide strategy for the entire Leeds Metropolitan District and the development of the strategy has evolved and has been informed by the preparation of a wide ranging evidence base. This includes a series of technical studies (including the Strategic Housing Market Assessment (SHMA) and Strategic Flood Risk Assessment (SFRA)) as well as information and responses derived through a series of informal and formal stages of public consultation, as part of the ongoing and iterative plan making process.

Consistent with the SCI, the emerging Core Strategy has been the subject of a number of phases of consultation. Initial scoping work was undertaken in September 2006, with Leeds Initiative stakeholders. This was followed in 2007 (October – November), with a 6 week period of formal public consultation on an 'Issues & Alternative Options' document. Subsequently, a further 6 week period of consultation was undertaken in November – December 2009, on a 'Preferred Approach', consultation document. A further 6 week period of consultation, was undertaken on this Publication draft of the document, following consideration by Executive Board, commencing 28th February to 12th April 2012.

Equality, diversity, cohesion and integration, have therefore been considered from a number of perspectives. This relates both to the strategy itself and associated policies and the provisions which have been made for consultation via a range of opportunities.

The pre submission draft of the Core Strategy, contains an overall Spatial Vision and a series of related objectives. A focus of this overall approach is to improve quality of life and the sustainability of Leeds for all residents. Integral to this direction is the desire to directly address (where this is within the scope of the Core Strategy or to influence other service providers) and plan for a range of social and community issues. This includes, planning for housing growth in the city to meet a range of housing needs, planning for job growth, promoting the regeneration of priority areas (to help tackle issues of multiple deprivation), seeking to maintain the vitality and viability of shopping areas for the benefit of communities and commerce, seeking to improve accessibility and public transport provision and planning to maintain and enhance environmental quality and distinctiveness.

Once adopted, the Core Strategy will be subject to an annual review through the Annual Monitoring Report (soon to be called the Authority Monitoring Report) (AMR). The AMR will use a series of indicators to determine whether the Core Strategy is being implemented appropriately in delivering its objectives and seek to identify if it is having its intended effect. The AMR should be used to help evidence required changes to decision making, if the Core Strategy is not having its intended effects. The AMR offers an opportunity to ensure that the issues raised by the EIA are reviewed and followed up.

- **Key findings**

(think about any potential positive and negative impact on different equality characteristics, potential to promote strong and positive relationships between groups, potential to bring groups/communities into increased contact with each other, perception that the proposal could benefit one group at the expense of another)

Previous stages of the Draft Core Strategy have been the subject of EIA screenings and this EIA summarises the findings of these as well as any potential new changes. The report sets out the Councils position in relation to questions which the Inspector has raised approaching the Core Strategy Examination, and the impact of any changes to the affordable housing policy in Policy H5 of the Core Strategy.

The main change proposed in this report relates to 2 aspects of affordable housing, these are thresholds and targets for affordable housing to articulate exact thresholds and targets rather than ranges for thresholds and targets as set out in the Draft Publication Presubmission Core Strategy, and setting these out in the Core Strategy rather than an SPD.

The only difference between the factors under consideration as part of this EIA and previous EIAs on the Core Strategy is that this EIA considers the impact of setting exact thresholds and targets as opposed to a range, within the Core Strategy rather than a Supplementary Planning Guidance Document (SPD). The Executive board report sets out options and preferences but ultimately feedback from the Inspector as to the way forward is essential in order to move forward the Core Strategy to adoption. The Executive board report recommends steps necessary to make a modification to the Core Strategy policy H5 this is based on evidence and will be subject to consultation through advertising the main modifications.

The threshold for affordable sees all developments of new dwellings providing affordable housing, with those developments above ten units providing on site affordable housing and those below ten providing a financial contribution. The impact this has is in terms of equality is that all developers must make a contribution to affordable housing, resulting in more financial contributions towards the provision of affordable housing which would mean an overall increase in the level of affordable housing which would benefit those in need of affordable housing in particular those on lower incomes and the young, but all equality groups who want to access the housing market.

The Executive Board report also sets targets for affordable housing based on evidence. In terms of equality characteristics the provision of affordable housing is an important provision for all however younger people, and those on lower incomes are particularly affected by the provision of affordable housing, and thus benefit from the provision of affordable housing.

- **Actions**

(think about how you will promote positive impact and remove/ reduce negative impact)

The Core Strategy Annual/Authority Monitoring Report (AMR) will be produced each year with the remit to evaluate Core Strategy implementation. This will be done through a monitoring framework, which will need to be approved as part of the Core Strategy.

The monitoring framework will be set up to monitor the objectives which underpin all the policies. These objectives will have a number of indicators which will be used to help gauge whether the Core Strategy is being implemented appropriately and that the anticipated effect of implementation is being achieved.

With regards to equality, it will be important that the monitoring framework picks up on the issues identified through the Equality Impact Assessment Screening. The EIA has identified that there are a number of areas where a negative impact might be expected due to the implementation of the Core Strategy. It is important that the monitoring framework reports on these issues, and where appropriate, link the reporting back to the EIA.

5. If you are **not already considering the impact on equality, diversity, cohesion and integration you **will need to carry out an impact assessment.****

Date to scope and plan your impact assessment:	
Date to complete your impact assessment	
Lead person for your impact assessment (Include name and job title)	

6. Governance, ownership and approval

Please state here who has approved the actions and outcomes of the screening

Name David Feeney	Job title Head of Forward Planning and	Date 27/11/13
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	Implementation	

7. Publishing

This screening document will act as evidence that due regard to equality and diversity has been given. If you are not carrying out an independent impact assessment the screening document will need to be published.

Please send a copy to the Equality Team for publishing

Date screening completed	
Date sent to Equality Team	
Date published (To be completed by the Equality Team)	