Equality, Diversity, Cohesion and Integration Screening

Directorate: City Development



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.

Service area:

Forward Planning & Implementation

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- 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.

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Lead person:	Contact number: 0113 2474539			
Dave Feeney				
1. Title: Local Development Framework (LDF) Core Strategy – Pre-submission				
Changes for Consultation				
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Is this a:				
x Strategy / Policy Servi	ice / Function Other			
If other, please specify				

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

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 proposed changes have subsequently been considered by Development Plans Panel.

In summary since the last EIA screening was carried out 2 new policies have been introduced, and various changes have been made to the existing policies, some major and some minor. There are many minor changes to the text, some being grammatical corrections, this EIA screening has not highlighted these. Reference to minor changes which do not have any implications for equality have not been included, however all minor changes have been examined to ensure that any equality implications have been considered in the formulation of the Core Strategy policies.

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	Х	
equality characteristics?		
Have there been or likely to be any public concerns about the	X	
policy or proposal?		
Could the proposal affect how our services, commissioning or	Х	
procurement activities are organised, provided, located and by		
whom?		
Could the proposal affect our workforce or employment		Х
practices?		
Does the proposal involve or will it have an impact on	Х	
 Eliminating unlawful discrimination, victimisation and 		
harassment		
 Advancing equality of opportunity 		

Fostering good relations

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)

Within the context of the Spatial Vision & Objectives outlined above, the Publication draft of the Core Strategy is divided into a series of interrelated Themes and Policy areas. These are, the City Centre, Managing the Needs of a Successful District (Housing & Employment), Place Making, a Well Connected District (Transport), Managing Environmental Resources and Implementation & Delivery.

The purpose of this framework is to direct regeneration and growth in the city, in responding to a complex range of economic, social and environmental challenges and opportunities. The framework is intended to guide investment decisions and the development management process – whilst given spatial expression to the Vision for Leeds and a strategic context for the preparation of the Site Allocations Development Plan Document (DPD).

In seeking to achieve longer term sustainability, the overall balance of the strategy is seeking to maintain and enhance the role of existing places, whilst planning for current and future community needs. Within this context, a key challenge for the Core Strategy is planning for housing growth (as a result of population and demographic changes). Whilst housing growth is necessary to meet these complex needs, many issues have been raised via the consultation process regarding the need for Affordable Housing, the need to make provision for disabled people and the elderly (in enabling independent living) and concerns of some communities regarding the physical impact of new housing development upon the character of local areas.

The Core Strategy consists of a number of topic areas. The Publication Draft Core Strategy, Equality Impact Assessment screening (EDCI)(December 2011) summarises each of the main topic areas and should be read alongside this screening. This screening focuses only on the changes made as a result of the 6 week public consultation on the publication draft and the pre submission changes proposed to the draft Core Strategy as the result of the consultation.

Introduction, Spatial Vision & Objectives

Changes:

- A new policy on the National Policy Planning Framework (NPPF)
- Introduction of wording to make reference to PROW (Public Right of Way)
- New wording to make reference to Duty to cooperate
- New wording to strengthen references to Health & Social Care Act 2012 & duty of authorities to improve public health
- Minor wording changes for improved clarity.

A new policy has been introduced on the NPPF, which was launched in March 2012. purpose of this is to ensure that the positive sustainability aspects of the NPPF are emborin all Core Strategies. In terms of equality this ensure that National policy is key in formulation of the Core Strategy, and as such this has an impact on all equality groups strategic level.

More explicit reference to the PROW network helps to promote access for all and opportur for all the community to enjoy a healthy lifestyle, leisure and recreation district wide between residential areas greenspace and the open countryside.

New wording has been included to make reference to the duty to cooperate to reflect statutory requirements as part of the 2011 Localism Act. The overall intent of the Act improve opportunities for all of the community to engage in Neighbourhood Planning and formal arrangements to be in place for local authorities and agencies to address 'c boundary' issues in a coordinated way. The benefit of this is to promote a more inclusive transparent planning process, for the benefit of local communities. This in turn increases opportunities for groups to

come together as a basis to consider potential impacts/benefits of planning proposals/issue common interest, as part of the decision making process.

In reflecting best practice, a Health Impact Assessment screening workshop & background paper has been completed in the preparation of the Publication draft Core Strategy. Introduction of the 2012 Health & Social Care Act has introduced a new duty for authorities to improve public health for the benefit of the community. Within this contenumber of updates have been made to the CS supporting text to

make explicit reference to the Joint Strategic Needs Assessment and duty to improve p health. This has helped to strengthen references in the document and to signpost to spe policies (such as quality housing, job creation, greenspace & opportunities to improve wa and cycling), which have a direct & positive impact upon public health. Integral to approach is recognition of the nature of health

deprivation across the district and the need to help target development proposals investment where possible through the planning process to seek to address health inequa where possible.

SP10 - Green Belt

Changes:

 Amendment to policy wording to provide a basis to consider proposals outside of settlement hierarchy.

This amendment provides a basis to consider development proposals, outside of settlement hierarchy and the need for such proposals to demonstrate that they car delivered in a sustainable way. Integral to this is the need for such proposals to be consistent with the sustainability objectives of the CS as a whole and the requirements o NPPF. Consequently, issues of equality will need to be integral to such proposals, through delivery of policy objectives and requirements.

Managing Environmental Resources

Changes:

 Wording change to cross reference the NRWDPD (Natural Resources and W Development Plan Document) and Water Framework Directive.

The purpose of this change is to make explicit cross reference to more detailed policie water resources covered in the NRWDP and to the Water Framework Directive. Reference to this material is important in ensuring that the role of mana environmental resources and their contribution to quality of life for all is recognised as integral aspect of the Core Strategy and Local Development Framework.

Transport

For transport policies there are no major changes, however there are a number of minor changes.

Retail

Summary of Changes

Policy P1 lists all the centres across Leeds and categorises them into town, higher order local, or lower order local centres. As a result of new survey work, some anomalies in Policy P1 have been clarified and rectified, which has removed entirely a few of the very smallest centres, and re-categorised three other centres. This effectively reflects their existing characteristics rather than being a policy decision. However, it aims to strengthen even further the Core Strategy approach to 'centres first', and thereby supports that all people benefit from the co-location of uses, facilities and services.

Considerations of change of use from retail to non-retail (including hot food takeaways) have been added to Policy P4 relating to lower order local centres. It is considered that this provides further support for equality in that it should increase accessibility for all but in particular those more reliant on local facilities such as the elderly and those on lower incomes.

Policy P5 has been slightly modified to change the reference to 'major foodstore' to 'investment in new foodstore provision'. This is intended to reflect that a large store may not be appropriate in all centres. it is not considered that there are any equality impacts

as a result.

Policy P8 on the 'sequential and impact assessments for town centre uses' has been subject to a major change, but the reorganisation of the policy is to provide better clarity. The overall intent to direct investment to in centre has not altered and therefore there is no impact on equality.

The term 'sport and recreation' has been added to Policy P9, which is considered to support all groups and in particular those which make more use of such facilities.

Design, Conservation and Landscape

Policies P10, P11 and P12 refer to design, conservation and landscape and their importance in creating successful places and conserving local character.

Policy P11 relates to Landscape. There are some minor positive changes to the policy. The policy includes an added reference to promote the conservation of Victorian and Edwardian civic and public buildings, nationally significant buildings, and public parks, gardens, cemeteries and 19th century public transport network including the Leeds and Liverpool Canal. The policy also makes an added change to promote conservation led regeneration schemes. The changes to the policy recognise the positive contribution which conservation makes to all equality groups. The promotion of conservation led regeneration schemes, in particular aims to improve the quality of life for those groups on lower incomes.

<u>Housing</u>

SP6 The Housing Requirement

Changes:

- In clarifying the role of 20,000 dwellings with extant planning permission, add a
 footnote to paragraph 4.6.13 explaining that the SHLAA (Strategic Housing Land
 Availability Assessment) is used to determine deliverability of extant planning
 permissions
- Minor wording addition to clarify that Green Belt land release is not the only alternative to windfall. The additional wording clarifies that Green Belt land release comes after PAS (Protected Areas of Search) land and UDPR (Unitary Development Plan Review) allocations have been accounted for.
- Minor change to criterion iv) of Policy SP6 to say "...opportunities to *reinforce or* enhance neighbourhood distinctiveness..." rather than just "enhance".

Equality Impacts

It is not considered that these changes will have any substantive impact upon the various equality groups in Leeds.

H1 Managed release of sites.

Changes:

• New paragraph 5.2.6b to clarify that the City Council will interpret the NPPF definition

- of deliverable sites to include land-banked greenfield sites which are viable for development
- Revise the wording of the first paragraph of Policy H1 to clarify that the geographical distribution according to Policy SP5 should apply throughout the plan period not just the first 5 years.
- Insert the words "existing and proposed" before "green infrastructure" in criterion v) of Policy H1. This makes clear that the impact of new sites should be considered against proposed infrastructure as well as existing.
- Add "plus appropriate NPPF buffer" to the reference to "five year supply of deliverable housing sites" in the last paragraph of Policy H1.
- Clarify the wording of the last paragraph of Policy H1 with the replacement of "The" with "any and "may" with "will only". This clarifies that if the conditions (the meeting of the PDL target etc) are not met phases should not be brought forward.

Equality Impacts

Shortages of housing land could have a negative impact on young people who are more likely to be "priced-out" of the market because of high house prices and restricted mortgage availability than older people. However, the changes suggested to Policy H1 should not unduly restrain the quantity of housing land released. The addition of paragraph 5.2.6b is designed to encourage housebuilders to proceed with development rather than sit on land; similarly the addition of the "NPPF buffer" is likely to ensure that more land is made available for development. These changes should help deliver more housing. The clarification to the last paragraph of Policy H1 should alter the balance of housing delivery versus the preference for previously developed land toward the latter but when read in the context of the NPPF the impact is not likely to be great. The other changes are likely to have no impact or negligible impact.

Policy H2: New Housing on Non-Allocated (Windfall) Sites

Changes:

- Update the glossary definition of "greenfield" to include domestic gardens to accord with the national definition of "greenfield"
- Replace "and" with "or" in part a) of Policy H2. This means that greenfield land should not be developed if it either has intrinsic value as a space *or* contributes to the visual/historic/special character of the area. As originally written the wording meant that both conditions had to apply in order to protect the space, which could have allowed development that is damaging on one count.

Equality Impacts

It is not considered that these changes will have any substantive impact upon equality in Leeds.

Policy H3: Housing Density

Changes:

• Clarify in the supporting text with a new sentence to the end of paragraph 5.2.8 that all forms of housing development (including specialist development) will be subject to Policy H3 density standards with the exception of residential institutions.

Equality Impacts

Some elderly and disabled people will need to live in special care residential homes that are not classed as individual dwellings because the homes are more communal and provide care. The clarification that such residential institutions will be exempt from providing affordable housing should make them relatively easier to deliver. As such there is likely to be a positive impact on elderly and disabled people from this change.

Policy H5: Affordable Housing

The threshold for affordable housing after which a developer must provide affordable housing was proposed to be between 10-15 units. The proposed change 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. Younger people, and those on lower incomes are particularly affected by the provision of affordable housing.

Policy H7: Accommodation for Gypsies, Travellers and Travelling Show People.

The threshold to identify any suitable sites is proposed to increase from 12 to 15 pitches per site. This does not have any additional equality implications as the change in figure is minimal.

Policy SP3: Role of Leeds City Centre

Changes:

- Add text to Paragraph to describe the potential of the Holbeck Urban Village area of the city centre for development that respects the scale of the existing buildings and street pattern
- Add wording to criterion iv) of Policy SP3 to clarify that planning for the re-use of vacant and under-used sites also applies to vacant and under-used *buildings*
- Add wording to criterion vii) of Policy SP3 to say that enhancements are needed to make the city centre family friendly

Equality Impacts

The text concerning Holbeck Urban Village is descriptive of fact rather than introducing new or changed policy, so will not have any equality impacts.

It may sometimes be more difficult to achieve full accessibility for people with disabilities when re-using older buildings than constructing entirely new buildings. However, it is not considered that this possibility be reason to not encourage the re-use of vacant or underused buildings. The Core Strategy already expects new development (which would included conversions of existing buildings) to be accessible for all users. This is stated in Objective 4 (paragraph 3.3) and Policy P10 criterion vi.

The family friendly wording change should be positive toward women, families and children.

Policy CC1: City Centre Development

Changes:

- In paragraph 5.1.7 revise text from *all* of Leeds' need for comparison shopping being met in the city centre to *the vast majority*
- In paragraph 5.1.10 and in Policy CC1 change all references to "shopping parades" to "local convenience centres"
- In paragraph 5.1.15, add a viability clause to the expectation for higher standards of sustainability in dwellings built in the Aire Valley Eco Settlement
- In part iv) of Policy CC1 add that the city centre will be planned to accommodate improvements to the public realm
- In part b) of Policy CC1 offer encouragement to residential development providing it does not prejudice the town centre function of the city centre and provides a reasonable level of amenity for occupiers
- In part d) of Policy CC1 clarify the application of NPPF impact and sequential tests
- In part e) ii) of Policy CC1 provide more flexibility for convenience proposals of the 201-372sqm size to be developed if complementary to functions of the office areas or entertainment/cultural destinations
- In the final paragraph of part e) of Policy CC1 to replace the word "harmful" with the words "significantly adverse"

Equality Impacts

Higher sustainability standards of dwellings can sometimes mean higher standards of accessibility (eg lifetime homes standards at code for sustainable homes level 6). But national planning policy is clear that all local planning policies must be subject to tests of viability. In other words, do not impose standards that would make development unviable.

It is not considered that any of the other changes will have any substantive impact upon equality in Leeds.

Role of City Centre

<u>Policy CC3: Improving Connectivity between the City Centre and Neighbouring</u> Communities

Changes:

- At the end of paragraph 5.1.19 add the following sentences: "Any provision made under Policy CC3, will need to be considered in relation to the open space provision or contributions expected under Policy G5. The focus of these policies is to provide appropriate levels of on and off site contributions to open space and infrastructure to improve amenity and connectivity"
- Add the following to the purpose of Policy CC3: "improve access to jobs and services, to encourage greater usage"
- Revise the verb of obligation of Policy CC3 from "required" to "expected"
- Add text to provide more specificity about the improvements that new development will be expected to make. Set out that financial contributions can be sought, as well as on-site or near-site improvements

Equality Impacts

The effect of the changes is likely to widen the scope of the policy to developments at more city centre locations and to include financial contributions as well as on-site or near-

site improvements. This should provide greater scope to improve routes for cyclists and pedestrians in the city centre and connecting the city centre to adjoining neighbourhoods. Although the policy is not prescriptive, route improvements are likely to concentrate on issues such as level pavements, seating, safety, signage and visual attractiveness. Therefore, the greater scope of the policy is likely to have positive effects on disabled people, the elderly and other people that do not find it so easy to get around. Care will need to be taken to ensure that improvements for cycling do not endanger pedestrians.

Employment

Policy EC2 Office Development

The policy has been strengthened to support small scale office development and office extension proposals in accessible rural locations and within regeneration areas which are located away from town and local centres. This has the benefit of improving entrepreneurship within these areas, in particular benefiting small businesses and regeneration of these areas for all the equality groups.

Policy EC3 Safeguarding existing employment land and industrial areas.

The policy has been strengthened to protect existing employment land and industrial areas. In terms of equality the promotion of employment opportunities, in particular has an impact on groups on lower incomes, and creates greater opportunity for all equality groups.

Environmental Resources & Green Infrastructure

Cemeteries and Burial Place

Policy G7 seeks to locate new cemeteries and burial space in locations which meet a set of criteria. These criteria include access by sustainable transport modes and easy and safe access for people with disabilities.

Equality Impacts

This change has been made to reflect local evidence, that due to population growth demographic change, there is a need for additional provision across the district. Based upon this evidence the policy seeks to plan for all the community and religious denominations, in meeting current and future requirements in an appropriate way in suitable locations. In meeting these requirements, the policy seeks to meet the wide ranging needs of the community as a whole, in appropriate locations. By promoting locations accessible by sustainable transport modes, access for disadvantaged communities without private vehicle access and the disabled will be improved. Safe and easy access for disabled users/visitors is also required.

Implementation and Delivery:

Within the remit of implementation and delivery, is the development of the Community Infrastructure Levy (CIL) for Leeds. This will be monitored annually alongside the Annual Monitoring Report alongside monitoring of the Core Strategy. The development of the CIL has progressed since the last Core Strategy EIA screening, with commissioning of a Economic Viability Study, and by early 2013 to set the initial CIL rates in the Preliminary Draft Charging Schedule. Although closely linked to the Core Strategy and a vital mechanism for ensuring delivery of its necessary infrastructure (and included within Policy ID2), the CIL is a separate workstream. The CIL workstream will

be subject to its own EIA screening process.

Actions

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

The completion of a Sustainability Appraisal to integrate economic, social & environmental objectives,

- § Based upon an overall spatial vision & objectives, the formulation of an overall broad development strategy, to give priority to the role and character of places (individual settlements, the city centre & local town centres).
- § A focus upon regeneration priority areas
- § A phased strategy for housing growth, as a basis of meeting a range of housing needs, now and in the future.
- § Promoting the local economy and employment as a basis for tackling unemployment and job growth opportunities in key economic sectors across the district.
- § Recognising the local distinctiveness and character of communities across the District.
- § Promoting integrated transport solutions to improve accessibility and connectivity, whilst promoting walking & cycling.
- § Promoting quality of place through the management of environmental resources including green infrastructure
- § A key aspect of the plan will also be to monitor the implementation of policies via the LDF Annual Monitoring Report & also the Infrastructure Delivery Plan.

The Core Strategy Annual/Authority Monitoring Report 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.

Specifically the framework notes that there was a negative impact relating to:

- housing density for disabled groups,
- site selection was possibly too onerous for gypsy and traveller sites, and that
- access to green space and infrastructure might be limited to disabled groups and those reliant on public transportation.

The Core Strategy Monitoring framework should try to monitor these issues.

Monitoring of the provision of lifetime homes (as discussed in text preceding policy H8) might address the issues raised regarding housing density. Site delivery, as compared to the provision of new homes, might also identify whether Policy H7 can be effectively delivered to meet needs. Measuring accessibility of greenspace and green infrastructure

could help to address whether these areas are appropriately served by pubic transport or whether some areas of the District do not have appropriate access to greenspace/green infrastructure.

A final area which seemed to be quite prevalent without scoring poorly was the notion of safety as it relates to use of pubic transportation. The provision of and improvements to public transport therefore must be accompanied by investments into measures which address concerns regarding safety. This is an area that LDF monitoring may wish to look at as well.

5. If you are not already considering the impact on equality, diversity, cohesion and integration you will need to carry out an impact assessment .					
integration you will need to	carry out an impact as	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	sinent.		
Date to scope and plan you	r impact assessment:				
Date to complete your impa	ct 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	Job title		Date		
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 17		17	/10/12		
Date sent to Equality Team	n				
Date published					
(To be completed by the Equality Team)					