

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: Policy & Plans
Lead person: Robin Coghlan	Contact number: 0113 378 7635

1. Title: Core Strategy Selective Review (CSSR)

Is this a:

Strategy / Policy

 Service / Function

 Other

If other, please specify: It is a background evidence document to inform preparation of Policy

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

The latest stage of the Core Strategy Selective Review policies are considered in this EIA screening, previous screenings have been undertaken to ensure equality has been an integral part of the process.

The Core Strategy was adopted in November 2014. It sets out planning policy and strategy for the overall scale and distribution of future growth across Leeds MD, including targets for how much new housing and new employment is required up to 2028. The Core Strategy Selective Review proposes changes to a small number of discrete number of areas of the Core Strategy (see below), and there is a standard process which the policies must follow before they can be adopted or approved. EIAs have already been undertaken for the scope of the CSSR and the proposed policies of the CSSR at all key stages. The proposed policies of the CSSR have since been subject to independent examination by an

Inspector appointed by the Government. The planning inspector has recommended a number of modifications to the CSSR proposals. These modifications are considered necessary to make the CSSR “sound” or acceptable. This EIA examines the effects of the proposed modifications on the protected equality characteristics.

The submission draft of the CSSR contained the following changes.

- i) Update the housing requirement of Policy SP6 for the period 2017 – 2033 including consequential amendments for Policy SP7 on the geographical distribution of new housing, and the plan period
- ii) Update Affordable Housing Policy H5
- iii) New Policy H9 applying the nationally described space standards for new housing
- iv) New Policy H10 setting requirements for delivery of accessible dwellings
- v) Update Greenspace Policy G4, minor amendments to policy G5 & G6
- vi) Update Policies in relation to sustainable construction EN1 and EN2 in accordance with Government advice, and consequential change to EN4.
- vii) New Policy EN8 requiring Electric Vehicle Charging Points in new development

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. Also those areas that impact on or relate to equality: tackling poverty and improving health and well-being.

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

<p>Does the proposal involve or will it have an impact on</p> <ul style="list-style-type: none"> • Eliminating unlawful discrimination, victimisation and harassment • Advancing equality of opportunity • Fostering good relations 	<p>x</p>	
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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)

It should be emphasised that the adopted Core Strategy (2014) was subject to EIA screening and the CSSR, is set within the context of this overall approach. Early equality impacts screenings were considered following the Executive Board decision to approve preparation of the Core Strategy Review in February 2017. It is now possible to consider the equality impacts of specific planning policy changes as a result of modifications proposed by the Inspector following Examination. These are examined below in terms of a screening which gives consideration to equality, diversity, cohesion and integration.

Due regard was given to all equality characteristics. The changes assessed in this EIA are those that the Inspector at the Examination felt were needed to make the plan 'sound' or acceptable. Public Consultation has been held at all key stages of the process and following approval by Executive Board a further stage of public consultation will be held on the proposed 'modifications' for a 6 week period proposed to commence May/June 2019. The main modifications were assessed against all of the protected characteristics resulting in minor positive equality impacts as detailed below.

- **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)

Due regard has been given to all the modifications. Most of these are minor, these have been considered and have no impact on the on the protected characteristics. There are only two modifications that are considered to have an impact on people that fall into the protected characteristics groups and these are set out below;

Policy H9 is a new Policy that implements Nationally Described Space Standards. For ease the comments from the initial EIA are below to give a general overview of the Policy with regard to equality.

New Housing Space Standards are proposed in Policy H9 which will mean new dwellings have to meet the nationally described space standards. This sets minimum space standards for dwellings according to numbers of bedrooms and numbers of storeys. The standards are fixed nationally (and local authorities who wish to adopt them need to do so on the basis of evidenced need and viability), so it is not possible for local authorities to set different size standards of their own. Leeds is proposing to adopt the national standards to apply to all new housing with the exception of purpose built student accommodation and houses in multiple occupation. It is considered that the space standards will improve the overall amenity of new dwellings which will be positive for equality, diversity, cohesion and integration in Leeds. There will be less chance of people with certain protected characteristics having to live in under-sized accommodation which can have a negative effect on their quality of life. The qualitative improvement to housing will benefit all groups improving quality of housing for all. The Core Strategy review by including the Housing Standards improves the quality of housing for all, in particular those with young children, the elderly .Whilst it is accepted that there are practical reasons why the national space standards cannot be applied to new student and HMO development, Policy H9 proposes that this type of development reflects the national standards as closely as possible with allowances for differences in the nature of the accommodation.

A change is proposed by the inspector (MM13) as below

POLICY H9 MINIMUM SPACE STANDARDS

All new dwellings ~~should~~ comply with the following standards:

to:; All new dwellings **must** comply with the following standards:

The change of the word from 'should' to 'must' strengthens and improves the likelihood of compliance. This will have a minimal positive impact on the protected characteristics of age, maternity, disability, younger people. The policy has a positive impact on all the protected characteristics and the modification improves that impact

Policy EN1 is concerned with Climate Change and specifically Carbon Dioxide reduction. Initially it was proposed to change this policy to bring it into line with National Guidance. The original Policy was worded so new development would have to evidence carbon dioxide reduction at 20% below the Building Regulation level (Part L of the Building Regulations). New guidance suggested that it was not appropriate to go below prescribed Building regulation level.

However the National Guidance (in the form of a ministerial statement) was unclear. A modification was submitted to retain the current Policy. This was agreed by the Inspector. The change back to the original is proposed by the Inspector (MM23). The retention of the original Policy will have a positive impact on ensuring residential development is built to higher energy efficiency standards and will therefore a positive equality impact for all the protected characteristic groups of:

- **Actions**

Key actions have been incorporated into previous EDCI Screening exercises, and via mitigation as part of the Sustainability Appraisal process. The Core Strategy is underpinned by a monitoring framework, which provides a basis to monitor the performance and delivery of the plan. Following the next stage of consultation, there will be further considerations of any comments before the process is progressed.

The impact of the policies on the protected characteristics is considered above. The impact of new Policies, in particular H9 and H10, are particularly relevant to the protected characteristic groups of disabled people, older people and young families. Evidence of need and viability of development is critical to determining what policy changes are acceptable and compatible with each other (and current Policies within the adopted Core Strategy which are not subject to change as part of this review). National planning guidance also makes clear that policy requirements that place a burden on the cost of residential development should be collectively tested to ensure that residential development remains viable. Leeds has undertaken iterative viability appraisal of the CSSR policies and choices have been made about policy priorities. Within these parameters the policies proposed have been shaped to optimise provision of benefits such as affordable housing, green space provision / enhancement and quality housing standards.

Planning is a process responding to development and ensuring it is designed in such a way that it brings the maximum benefit to society. As highlighted above the changes to the policies are likely to have an impact such that when implemented through the planning process they will benefit the identified protected characteristics. In particular the addition of new policies which are proposed provides a positive impact in terms of due regard, particularly when considered cumulatively.

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:	
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Date to complete your impact assessment	
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Lead person for your impact assessment (Include name and job title)	
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6. Governance, ownership and approval

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

Name	Job title	Date
David Feeney	Head of Strategic Planning, City Development	
Date screening completed		16 th May 2019

7. Publishing

Though **all** key decisions are required to give due regard to equality the council **only** publishes those related to **Executive Board, Full Council, Key Delegated Decisions** or a **Significant Operational Decision**.

A copy of this equality screening should be attached as an appendix to the decision making report:

- Governance Services will publish those relating to Executive Board and Full Council.
- The appropriate directorate will publish those relating to Delegated Decisions and Significant Operational Decisions.
- A copy of all other equality screenings that are not to be published should be sent to equalityteam@leeds.gov.uk for record.

Complete the appropriate section below with the date the report and attached screening was sent:

For Executive Board or Full Council – sent to Governance Services	Date sent: 7/5/19
For Delegated Decisions or Significant Operational Decisions – sent to appropriate Directorate	Date sent:
All other decisions – sent to equalityteam@leeds.gov.uk	Date sent: