

# 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.

<b>Directorate: City Development</b>	<b>Service area: Forward Planning and Implementation</b>
<b>Lead person David Feeney</b>	<b>Contact number: 0113 3787660</b>

<p><b>1. Title:</b> Leeds Local Plan – Adoption of the Site Allocations Plan</p> <p>Is this a:</p> <p> <input checked="" type="checkbox"/> <b>Strategy / Policy</b>                                  <input type="checkbox"/> <b>Service / Function</b>                                  <input type="checkbox"/> <b>Other</b> </p> <p><b>If other, please specify</b></p>
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<p><b>2. Please provide a brief description of what you are screening</b></p> <p>The latest stage of the Site Allocations Plan (SAP) policies are considered in this EIA screening, previous screenings have been undertaken to ensure equality has been an integral part of the process.</p> <p>This Equality Impact Assessment Screening (EIA) is for the next stage of the Site Allocations Plan (SAP) which is adoption. Previous EIA screenings have been undertaken at key appropriate stages. The Site Allocations Plan is one of a series of Development Plan Documents (DPD) being prepared by the City Council, as part of the Local Development Framework (LDF). The scope and purpose of the Site Allocations Plan is to set out the detailed location of new housing, retail, employment, and protected greenspace for the whole of the District except for the area covered by the adopted Aire Valley Leeds Area Action Plan and the associated site specific policies over the plan period to 2028. The Site Allocations Plan needs to be in conformity with the Core Strategy. It directly builds on the parameters for</p>
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growth, including the broad distribution across the District as set out in the Core Strategy (adopted on 12<sup>th</sup> November 2014) and the Core Strategy Selective Review (CSSR) which is currently nearing completion and adoption, with the key focus to deliver on the Core Strategy's principles of sustainable development. Notwithstanding this, the allocation of Green Belt sites for housing to meet needs to 2023 ensures that the majority of sites in the Green Belt that had been proposed for housing in the Submission Draft Plan are deleted via the main modifications. The Inspectors are satisfied that there are no reasonable alternatives to the allocations proposed and the housing requirement provides the exceptional circumstance necessary to support the release of a reduced number of Green Belt sites, subject to the necessary infrastructure and site requirements being applied.

The Core Strategy sets out planning policies for the District and has undertaken Equality Impact Assessment Screenings at appropriate stages, to ensure as far as is possible, any negative consequences for a particular group or protected characteristic within the community are minimised or counter balanced by other measures. Within this context, the Site Allocations Plan helps to outline in detail the broad approach of the Core Strategy. It is not appropriate to screen the overall impact of the allocations district wide or the quantum of allocations in each housing market characteristic area, however it is important to ensure that equality has been an integral part of the process. In addition, planning applications for development on specific sites will need to demonstrate how proposals meet the objectives and policies of the Core Strategy. The Site Allocations screening therefore concentrates on decisions about specific sites and also on individual site requirements. It should be noted that a Sustainability Appraisal has also been undertaken which is an integral element and justification for which sites have been chosen for allocations.

This screening sets out how equality has been considered at this final stage of the Site Allocations process. At this stage of the Site Allocations agreement is being sought at Executive Board on the adoption of the Plan following the Inspectors Report. The Inspectors report sets out recommendations in relation to modifications following Public Examination. The Plan comprises the Submission Draft Plan (May 2017) plus the main modifications as detailed in the Inspectors Report, plus additional modifications the Council has made, which do not affect the soundness of the Plan (ie they are typing and grammatical errors).

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

- **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)

Since the last stage of the EIA, the SAP has been the subject of an Examination in public, with hearings held in October 2017 and July/August 2018, consultation on proposed main modifications to the Plan took place between 21<sup>st</sup> January and 4<sup>th</sup> March 2019 and the Inspectors report was received in May 2019

696 submissions comprising 2,400 representations were received in the consultation on the proposed Main Modifications (Jan – March 2019). These were sent directly to the Inspectors for their consideration, the conclusions of the Inspectors being detailed in their Report.

The modifications to the Submission Draft Plan (May 2017) include the deletion of 32 Green Belt sites previously proposed for development as well as amendments to site requirements on several sites.

It is the role of the Core Strategy to set the overall scale and distribution of regeneration and growth across the District, with the SAP and the Aire Valley Leeds Area Action Plan (AVLAAP), identifying site specific allocations to deliver these strategic requirements. *The Core Strategy has undertaken EIA screening at appropriate stages and given due regard to the equality characteristics. The equality considerations which were considered therefore in the Core Strategy and earlier stages of SAP still apply. Below are set out a summary of equality considerations given at previous stages and at this stage.*

*The SAP incorporates detailed Retail and Town Centre policies which have been worked up to incorporate those within the previous Development Plan (the Unitary Development Plan). These policies cover the designation of centre boundaries, primary shopping areas, detailed policy guidance for developments within protected shopping frontages within the City Centre and within other designated centres. The policy also includes detailed shop front guidance.*

*For housing and employment, individual site requirements provide additional layers of information in relation to highways, conservation areas, listed buildings, flood risk and other site specific requirements. In addition the equality screening of the proposal which designates airport employment land forms a separate equality screening (in July 2015).*

*Greenspace proposals have been updated at various stages of the plan process and information on the quality, quantity and accessibility of greenspace updated, which has a positive impact on all the equality characteristics.*

- **Actions**

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

Due regard was given to all equality characteristics. The changes assessed in this EIA are those that the Inspector at the Examination specified were needed to make the plan 'sound' or acceptable.

The Submission Draft SAP has been amended as detailed in the modifications the Inspectors consider are necessary to make the Plan sound, (as outlined in their report). These are;

- Set out the housing requirement for years for 1-11 of the plan period;
- Delete sites that need to be released from the Green Belt but are not necessary to meet the housing requirement for years 1 to 11 of the Core Strategy period
- Commitment to review of housing element of SAP immediately after adoption of the CSSR
- Delete all references to phasing of sites;
- Commitment to monitor the delivery of negotiated stopping places and private pitch provision through planning permissions and if necessary undertake a review of allocation of gypsy and travellers pitches post 2024;
- Clarify an individual site (for reference HG7-1 'West Wood, Dewsbury Road, Tingley) is to be removed from the Green Belt;
- Delete designation of additional land in Outer North East housing Market Characteristics Area as new Green Belt
- Amend allocation EG3 'Leeds Bradford International Airport' Employment hub to be consistent with other employment land;
- Delete identified and allocated sites that are no longer available or deliverable
- Revise policies relating to identified sites to be clear what this category includes ; list the sites relevant at the times of the examination in an Annex; ensure clear monitoring of identified sites to check ongoing availability and deliverability;
- Various modifications to generic and individual site requirements to ensure they are effective;
- Update capacity of sites to reflect most up to date information

The changes since the last SAP are therefore largely related to the detail of sites and are procedural and as such in terms of the protected characteristics have no impact. In particular the Inspectors report makes reference to the site assessment of gypsy and travelling showpeople and states that this should be monitored but concludes that the approach is sound. This has no impact on the equality characteristics.

Public Consultation has been held at all key stages of the process and following approval by Executive Board a further stage of public consultation on the proposed 'modifications' for a 6 week period proposed in May/June 2019. The main modifications were assessed against all of the protected characteristics resulting in no significant equality impacts. The main modifications to the plan can be summarised as relating to the detail of sites, phasing, monitoring, modifications to site requirements, site capacity and review of housing after the adoption of the Core Strategy Selective Review. The equality implications of these have been considered but they relate to site specific issues or procedural issues. As with all previous equality screenings the impact on equality characteristics has been considered in particular in terms of theme.

*The section below examines in more detail equality considerations in relation to the protected characteristics. The following points are therefore key findings in relation to these broad parameters and the impact on the equality characteristics and are similar to those identified in the Core Strategy, as the Core Strategy is the overarching policy framework for the Site Allocations Plan. Transport has been given the greatest consideration as set out below as it has an overarching impact on other topic areas as accessibility as one of the key considerations for equality.*

## Transport

### *Race*

*Differential access to the transport system and the effect of transport policies, particularly for Black, Asian and Minority Ethnic (BME) people are around impacts on access to employment, education and training, which are important issues for BME communities as a means of overcoming known disadvantages in the job market. One of the reasons for this is greater reliance of BME communities on public transport, and a consequent difficulty accessing more remote employment locations. People from BME groups often have increased safety concerns about using public transport, particularly at night, yet BME groups are more likely to be involved in shift work or making journeys to non-mainstream venues at unsocial hours.*

### *Age*

*Young people rely very much on public transport, although many have personal security concerns when using public transport and this is coupled with the fact that in terms of actual risk they are the age group which are most likely to be the victims of violence and/or assault. Many older people are not able to drive because health conditions related to their age or find the cost of running a car prohibitive. Consequently, public transport often plays a vital role in enabling participation in community life for older people. Planned improvements to strategic connectivity and the reliability of public transport will benefit people in both these younger and older age groups. Older people are disproportionately more likely to be living in poverty and suffering the associated effects of low quality and inappropriate housing. Older people require access to a range of facilities and services within their local area. Older people also have a higher incidence of long-term ill health. It is important therefore that they are able to gain access to healthcare facilities and preventive health and well being services by public transport accessible within walking distance.*

### *Gender*

*Fewer women drive than men, and women drivers are likely to have less access to the use of a car. Consequently, women often have a greater reliance on walking on footpaths and local roads. Women more frequently have primary responsibility for the care of their children, which often exacerbates problems regarding access to travel, as they may need to combine escorting children to school or childcare with travel to work, shopping or other activities, involving trip chains to multiple destinations.*

*Despite men (particularly young men) being the most frequent victims of violent crime and assault, women have greater concerns regarding personal safety. Although broad measures to increase public transport use may increase informal surveillance and deter acts of violence, it is outside the scope of the Site Allocations Plan to specifically improve women's personal safety when travelling which would be considered when assessing individual planning applications for housing sites.*

### *Disability Discrimination*

*Differential access to the transport system and the effect of transport policies, particularly (but not restricted to) those with physical and sensory impairments, mental health issues or learning disabilities. Disabled people travel more frequently by bus than others, so public transport plays a vital role in ensuring that they can participate in community life and avoid social exclusion. Overcrowding and disruption of services on public transport is a deterrent to travel for disabled people. Taxis also are used disproportionately by*

*disabled people, so ensuring good road connectivity is vital.*

#### *Race Discrimination*

*Differential access to the transport system and the effect of transport policies, particularly for BME people are around impacts on access to employment, education and training, which are vitally important issues for BME communities as a means of overcoming disadvantages in the job market and improving whole life and economic opportunities. One of the reasons for this is greater reliance of BME communities on public transport, and a consequent difficulty accessing more remote employment locations. People from BME groups often have increased safety concerns about using public transport, particularly at night, yet BME groups are more likely to be involved in shift work or making journeys to non-mainstream venues.*

*Effects on cultural resources of particular significance for ethnic minority groups (e.g. places of worship, community facilities, etc.). The ways that public transport is organised and operated frequently does not meet the needs of some BME communities. Focusing on particular peak periods and winding down services on specific religious holidays may not reflect the needs of an increasingly diverse population.*

#### *Discrimination on grounds of sexuality or gender identity; (Neutral)*

*Equality Effects; Members of the lesbian, gay, bi-sexual and trans-gender (LGBT) community typically have greater concerns about personal safety when using public transport due to fear of victimisation or harassment.*

*Proposals to improve strategic connectivity and the reliability of public transport services may increase informal surveillance and deter acts of violence. However, there is little in the Core Strategy that is likely to specifically improve personal safety of LGBT people when travelling.*

*Equality Effects; Young people rely very much on public transport, although many have personal security concerns when using public transport and this is coupled with the fact that in terms of actual risk they are the age group which are most likely to be the victims of violence and/or assault.*

*Many older people are not able to drive because health conditions related to their age or find the cost of running a car prohibitive. Consequently, public transport often plays a vital role in enabling participation in community life for older people. Planned improvements to strategic connectivity and the reliability of public transport will benefit people in both these younger and older age groups.*

#### *Religious Discrimination; (Neutral)*

*Equality Effects; Differential access to the transport system and the effect of transport policies, particularly (but not restricted to) Christians, Muslims, Buddhists, Jews, Sikhs and Hindus (e.g. cultural or religious requirements for travel at particular times). Effects on cultural resources of particular significance for religious groups (e.g. places of worship).*

*There is a lack of transport planning for major religious festivals and at Christmas especially non-Christians may be left without transport while still needing to work or make other vital journeys. There are few proposals of the Core Strategy that address existing inequalities, but also no specific measures that will exacerbate these. However,*

*placement of employment sites may help mitigate this.*

*Social Deprivation/Exclusion; (Slight Benefit)*

*Equality Effects; The key issue here is the extent that the Site Allocations will have a positive effect on the number of jobs and the general functioning of the economy. On balance, this is likely to work towards reducing deprivation and exclusion, although the effect of this is likely to be slight. The early prioritisation of employment especially in the context of linking new employment to sustainable travel will increase employment opportunities for those currently unemployed.*

*The increased emphasis on walking and cycling has the potential to benefit people on low incomes and identifying new housing sites which are well located in relation to existing settlements and the main urban area will enable best access to employment and facilities.*

*Retail*

*Identifying centre boundaries and primary shopping frontages providing detailed policy guidance in order to implement Core Strategy policies and protect the centres increases accessibility for all but in particular those more reliant on local facilities such as the elderly, disabled people, and those on lower incomes. Identifying sites at the edge of the Centre as part of the site Allocations process provided opportunities for all the protected characteristics, as good accessibility benefits all groups. All people benefit from the co-location of uses, facilities and services. By grouping them together it could lead to groups/communities coming into increased contact and therefore increasing community cohesion and integration.*

*The retail allocations are not considered to give preference to any one group and that all people benefit from the co-location of uses, facilities and services, accessibility of local centres is important. By grouping them together it could lead to groups/communities coming into increased contact and improved accessibility for all. Use of the sites for retail would preclude them being brought forwards for housing or employment.*

*Housing*

*In identifying sites for housing, it is important that sites avoid areas of flood risk which would present a concern for all the community, including but particularly the most vulnerable. Sufficiency of supply of housing will be of greater importance to the young who are more likely to form new households and generate a need for new housing and issues of affordability. Housing schemes particularly aimed at elderly people should be located within easy walking distance of town or local centres or have good access to a range of local facilities or good transport links. Increasing provision for an ageing population and for the young. Policy H4 of the Core Strategy on Housing mix in particular creates more appropriate mixes. At adoption of the Site Allocations Plan sites have been identified which would be particularly appropriate for sheltered or other housing aimed at elderly people. In a similar manner the accommodation needs for Gypsies and Travellers have been identified on an equal basis with the accommodation needs of the house occupying population and the subsequent criteria for site selection should not be over-restrictive. A number of sites have been identified as future allocations for Gypsy and Traveller accommodation, this has involved significant consultation with local Gypsy and Travellers community to ensure that the proposed sites are located in suitable locations and meet their specific cultural requirements.*

*The Inspectors report makes reference to the site assessment of gypsy and travelling showpeople and states that should be monitored but concludes that the approach is sound.*

*People with disabilities could be disadvantaged if the required densities are too high and make it difficult to accommodate features of housing design necessary to enable accessibility to all. It is important that new housing avoids areas of flood risk which would present a greater concern to disabled people.*

### City Centre

*Age. Growth in jobs will be particularly helpful for young people to promote equality in terms of a high youth unemployment rate and helping younger people to become increasingly 'up-skilled' to take advantages of employment opportunities in later life.*

*Age, gender, race and sexual orientation. The city centre needs to be designed to be and to feel safe and secure. New pedestrian routes and spaces, including the City Centre park, will be needed for managed events that can promote a sense of community cohesion.*

### Housing sites in regeneration areas / areas of social deprivation

*Sites here will have a positive impact in the named deprived neighbourhoods which are often made of those who are socially and economically disadvantaged because of their age, gender, ethnicity or disability, and therefore are unable to access in their area a choice of quality housing which is affordable. Proactive communication maybe required to counter possible negative perceptions from communities in other 'deprived' areas who feel their needs are being ignored, for example through the neighbourhood planning process.*

### Employment

*Identifying sites for employment seeks to aid the growth and diversification of the Leeds' economy which should improve job prospects, availability and increase skills/training opportunities for a range of businesses and groups/residents. Improving prospects and diversity of jobs should help to reduce unemployment which in turn should result in an increase of opportunities for all ages, including different ethnic groups. Training and skills opportunities can also be promoted locally to assist groups who are more reliant on public transport to access employment. A separate EIA screening was carried out for Employment land allocated at Leeds Bradford Airport as part of a package of proposals for the airport.*

*Site allocations within the context of the core strategy policies have positive impacts for all ages, people with disabilities, gender and BME. The overall policy promotes in and edge of centre sites with good access to facilities and public transport links. It seeks to better meet the needs of employers and potentially could increase jobs to meet local need and to improve mental well being and economic outcomes. The provision of office development in main centres provides a sustainable location for workers to access local facilities and public transport networks and may improve increase safety within the public realm as well as contributing to regeneration.*

*Implications for Equality*

*Provision or retention of jobs may support people from different communities to mix together at work which is beneficial to overall community cohesion.*

*Greenspace*

*In some instances, disadvantaged communities have lower levels of access to green space, further away, or inaccessible by public transport. By promoting city wide green space standards, access for disadvantaged communities without private vehicle access and the disabled will be improved. The protection and enhancement of green space provides a positive amenity improvement to all groups. Low income and disadvantaged communities also tend to have lower levels of access to natural habitats which will be important in identifying specific types of green space designations, or provision through the planning application process.*

*Disadvantaged communities tend to have lower levels of access to Green Infrastructure and green space. By promoting city wide green space standards, access for disadvantaged communities without private vehicle access and the disabled will be improved. The protection and enhancement of green space provides a positive amenity improvement to all groups.*

*In addition a Sustainability Appraisal of the SAP has been undertaken. The SA of the SAP assesses the effects of the site allocations against the SA objectives. An SA Report was prepared to accompany all stages of the plan making process, with an individual assessment of sites being considered for allocation for retail, employment and housing use, and consideration of the cumulative effects of the proposed site allocations coming forward collectively, along with mitigation measures to ameliorate any negative effects being identified. Due regard has been given to the protected characteristics.*

**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	Job title	Date
Date screening completed		

## 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](mailto: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 <b>Governance Services</b>	Date sent:
For Delegated Decisions or Significant Operational Decisions – sent to appropriate <b>Directorate</b>	Date sent:
All other decisions – sent to <a href="mailto:equalityteam@leeds.gov.uk">equalityteam@leeds.gov.uk</a>	Date sent: