

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 and Plans
Lead person: Nasreen Yunis	Contact number: 0113 3787640

1. Title: Local Plan Update 1 (Pre-Submission Changes Consultation)

Is this a:

Strategy / Policy

Service / Function

Other

If other, please specify

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

This Equality, Diversity, Cohesion and Integration Screening relates to the next stage of the Local Plan Update (LPU). The plan is now at the presubmission changes consultation stage. Following detailed consideration of consultation responses to the Publication draft (the last stage), a number of changes are proposed to the draft policies before the Plan is submitted to the Secretary of State (the Government for consideration for the next part of the statutory process). In particular the report requests endorsement of the revised Local Plan Update 1 Draft policies and approval to undertake further public consultation on this pre-submission draft as well as accompanying consultation documentation. This screening focuses on the main changes as previously the draft policies have already integrated equality considerations from the outset in policy formulation.

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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).

At Executive Board on the 23rd June 2021 the initial scope of the Local Plan Update was agreed. This was subsequently reflected in the consultation material which sought consultees' views on a scope that focussed on the need to update and improve existing policies and make new ones, to help address climate change and the climate emergency declaration, through the 5 topic areas:

- Carbon Reduction
- Flood Risk
- Green and Blue Infrastructure
- Placemaking
- Sustainable Infrastructure

In the formulation of individual policies equality has been an integral thread which is summarised for the main policies in the section below. The existing policies have already been assessed in terms of equality considerations and this screening focuses on proposed changes only. As the policies evolve equality will further be considered at all key stages.

- **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)

This screening sets out the main considerations as a result of proposed change as below.

CARBON REDUCTION

The publications draft policy aims were to ensure that from 2027 most new applications (with some exceptions) achieve a net zero standard in their operational use, by maximising energy efficiency, reducing energy demand and making use of renewable energy.

- Requiring that all major applications calculate the whole life cycle carbon emissions of their proposals, to understand the impacts of all stages of development, rather than just its occupation and operation.
- Requiring that all major development meet a sustainable construction standard, therefore allowing for high standards of construction.
- Identifying opportunity areas for renewable energy generation and establishing criteria for the successful determination of planning applications for such uses, as well as energy storage facilities.
- Encouraging developments to make use of a range of sustainable energy and heating technologies, where connections to the District Heating Network are not possible.

The policy is also underpinned by a new strategic climate change mitigation and adaption policy which drives the aspiration to achieve a reduction of carbon emissions to net zero by 2030, whilst tackling the biodiversity emergency and promoting health and well-being.

The main change to this policy area is the introduction of a transition period to manage the shift towards true net zero developments, this is to reflect the challenges the development industry has highlighted in delivering net zero developments from adoption. The policy is therefore amended to be a 2-stage one, with developments applying for planning permission after 2027 being required to meet ambitious energy efficiency standards and being truly net-zero, either through renewable energy generation on-site or through carbon offsetting contributions to the Council. Development before 2027 will be required to meet a lower standard of energy efficiency (but still significantly more ambitious than current policies), and a requirement to maximise renewable energy generation on site, rather than achieve net zero. In addition a change in sustainable design and construction is proposed, this in effect will remain at the same standard as is current. The impact on the protected characteristics of these changes are that polices will take longer to implement. The policies provide a positive benefit for all in particular those on lower incomes, the young and elderly. The impact of carbon reduction is set out in the last screening and is positive but it is also recognised that the development industry may need more time to implement this.

FLOOD RISK

The policy looks at flooding holistically. In part it refers to the existing flood alleviation scheme (FAS) the aim of which is to protect existing development and not to enable new development to take place. Where a new development is proposed that relies on the FAS for defence then the residual risk of a breach or failure of the defence must be taken into account.

The flood alleviation scheme is on the River Aire, on the River Wharfe at Otley and on the Wyke Beck. In areas where the risk of flooding is reduced because of the presence of flood alleviation schemes or defences, proposed development will need to address the residual risks associated with a potential breach and over topping of the flood alleviation scheme or other defence, whichever is the worst case scenario. Breach modelling is

needed to establish the extent of these residual risks to be sure that the proposals will be safe.

Changes in the main relate to minor terminology changes for clarity and the insertion of a requirement to undertake a Water Framework Assessment to address comments made by the Environment Agency and alterations to reflect the new definition of functional floodplain in National Planning Practice Guidance. In terms of equality the changes add clarity and strengthen the policy and in particular this will benefit those who are more vulnerable such as the elderly, the young and those on lower incomes.

GREEN AND BLUE INFRASTRUCTURE (GBI)

There are a number of policies which aim to improve green infrastructure, the main policies are listed below;

- Requiring planning applications to consider GBI at the earliest stage with the aim of protecting, maintaining, enhancing and extending GBI where appropriate.
- Requiring applications to include GBI assessments.
- Enhancing protections for existing trees and hedgerows.
- Requiring ambitious targets for tree replacement and additional planting to ensure that Leeds overall tree canopy is increased.
- Requiring a further consideration of new Green Space provision to ensure it is being directed to the right locations and in the right form.
- Establishing clear criteria for how the quality of Green space should be considered as part of new planning applications.
- Establishing clear policy on how applications should adequately consider the future maintenance of new GBI provision.
- Establishing clearer definitions of green space and how it will be protected through development.
- Requiring local food production and wider encouragement for sustainable food production.
- Establishing further protections for the Leeds Habitat Network and a locally specific clarification of how Biodiversity Net Gain should be addressed in Leeds.

The main changes which are proposed are amendments to ensure consistency with national policy and, to give clarity in particular in terms of type of planting, protection and maintenance. As a result of public representations requesting requirements for new bird and bat-friendly features to be integrated into new development, a new requirement to incorporate 'swift bricks' for birds and bats has now been proposed. Green infrastructure benefits all, in particular the following protected characteristic of age, pregnancy and disability will benefit people through better air quality and better designed environments that are accessible to all. Benefits to the protected characteristics are far ranging and include mental and physical health of all users, this has a direct impact on those immediately adjacent to the green area or tree but also all users in the vicinity. The direct impact of good quality environments be these rural or urban is important for all groups.

PLACEMAKING

The ethos of these policies is to promote good quality of design as a key aspect of sustainable and resilient development. Excellent design is essential in creating places in

which current and future generations can enjoy a high quality of life which is fulfilling, inclusive and healthy.

- Establishing a broad consideration of good design to ensure that the highest design standards are being achieved in Leeds.
- Establishing clear principle for high quality placemaking.
- Updating the 20-minute neighbourhood concept into planning policy by recognising the importance of creating complete, compact, connecting places, defining its meaning in Leeds, and requiring that new development be directed to sustainable locations.
- Ensuring that the wider determinates of health (housing, employment, education, green space, air quality, transport, climate change and social and community networks) are taken into account in development so as to increase life expectancy and narrow health inequalities.

The proposed changes focus on technical and other amendments for clarification. The direct benefit of these policies is that good quality environments impact in a positive way and benefit all the protected characteristics. When developing detailed proposals for guiding development following the concept of living locally it is vital that accessibility for all users is ensured. This is consistent with all other forms of development and transport planning. Accessibility is a key aspect for all and an important part of the proposed policies, particularly for the protected characteristics of age, disability, pregnancy and maternity. Not only do communities need to be well-connected to each other via accessible public transport, active travel routes, and disabled parking, it also needs to be easy to travel within each neighbourhood, with good pavement infrastructure, appropriate lighting, and plenty of places to rest.

SUSTAINABLE INFRASTRUCTURE

MASS TRANSIT, RAILWAY INFRASTRUCTURE AND DIGITAL CONNECTIVITY

The policies in this section of the Local Plan Update focus firstly on site specific infrastructure and then on the provision of digital connectivity. In particular the policies plan for significant investment in transport infrastructure in Leeds (including supporting the Combined Authority's vision for Mass Transit and subsequent business case to Government, as well as helping plan for the outcome of the Government's study on how HS2 trains will arrive at Leeds from the East Midlands as outlined in the Integrated Rail Plan), which is proposed over the coming years, by facilitating and supporting these works, and in ensuring that they come forward in a manner with maximises their potential benefits and minimises or mitigates any potential adverse impacts.

The main change to this section is the deletion of the draft digital connectivity section due to recent changes to Building Regulations which now include similar requirements as those set out in the original draft policy. There is no negative impact on the protected characteristics as the policy is being introduced by national legislation.

- **Actions**

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

Due Regard has been given to the protected characteristics, the Local Plan Update has integrated equality from the outset as set out in the section above. The policies also sit within the context of other adopted planning policies which have been screened through the equality process. As a general aim the policies aim to promote the quality of development and as such provide a positive impact on the protected characteristics.

The draft plan, including draft policies, evidence base and sustainability appraisal was consulted on for 8 weeks from the 24th October to the 19th December 2022. The consultation was designed to be inclusive and accessible, including a series of drop-in sessions across the City, daytime and evening webinar sessions, as well as summaries and videos to accompany the material.

550 representations were received as part of this consultation, including over 400 smartsurvey responses, 90 emails and 45 young persons surveys. In accordance with targets adopted through the Council’s new Statement of Community Involvement, the consultation received a comment from every ward in Leeds and gained an 86% approval rating of those who completed the digital survey.

Overall, the Publication draft Plan was positively received with 85% of Smartsurvey responders being supportive of the Plan as a whole. Individually, the policies have gained strong support from the public and stakeholders with all receiving over 80% support. However, there are a range of objections to the policies, particularly from the development industry, as well as request for detailed changes from statutory consultees such as Natural England and the Environment Agency.

The report of consultation sets out in detail how consultation was held, what the consultation principles were to include equality as the thread, consultation material and publicity as well as summary of all representations and all proposed changes. These changes have been given due regard at this presubmission stage and will continue to be given due regard in the next proposed period of further public consultation.

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)	
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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
Martin Elliot	Head of Strategic Planning, City Development	19/9/23

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. If this screening relates to a Key Delegated Decision, Executive Board, full Council or a Significant Operational Decision a copy should be emailed to Corporate Governance and will be published along with the relevant report. A copy of all other screening's should be sent to equalityteam@leeds.gov.uk . For record keeping purposes it will be kept on file (but not published).	
Date screening completed	
If relates to a Key Decision - date sent to Corporate Governance	
Any other decision – date sent to Equality Team (equalityteam@leeds.gov.uk)	