

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:		
<input checked="" type="checkbox"/> Strategy / Policy	<input type="checkbox"/> Service / Function	<input type="checkbox"/> 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
<p>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. In February 2017 Executive Board agreed to preparation and scope of a Core Strategy Selective Review (CSSR). Consultation on the scope of the review took place during the summer (June – July) and with Publication draft consultation taking place 9th February - 23rd March 2018. Approval is now being sought for the Submission Draft Plan to be submitted for independent examination to the Secretary of State The CSSR covers the following Policy areas:</p> <p>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</p>

- 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
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)

It should be emphasised that the adopted Core Strategy (2014) was subject to EDC&I and the CSSR, is set within the context of this overall approach. Early equality impacts screenings were considered of 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. These are examined below in terms of a screening which gives consideration to equality, diversity, cohesion and integration.

- **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)

The proposed elements of the CSSR are to be reviewed in turn:

- i) Update the housing requirement and extend the plan period to 2033. A Strategic Housing Market Assessment (SHMA) has examined the latest demographic and economic evidence and concluded that the need for new housing in Leeds has reduced from the time when the Core Strategy was originally examined and adopted. An annual requirement of 3,247 (equivalent to 51,952 over the plan period 2017 – 2033) is now being proposed in the CSSR. The equality implications of this possible outcome are not clear cut, but one would expect implications for access to housing of different groups in need. On the face of it, reduction in housing supply could potentially adversely impact on people who have not yet bought their own homes, which is likely to include young people, and those on lower incomes, but this should not be a problem if the quantity of housing being planned for reflects robust evidence of actual housing need. In this respect the chosen option of 3,247 dwellings per annum is considered to have acceptable impacts on equality, diversity, cohesion and integration. The higher options of 3,478 dwellings pa and 3,783 are also considered to have acceptable impacts. However, the lower option of 2,649 dwellings per annum is considered to have unacceptable impacts as this option reflects housing needs in a more limited way. It should be emphasised also that the determination of the CSSR housing requirement, sits with the context of the Council's extensive efforts to improve the level of housing delivery, via the work of the Housing Growth Board. The focus of this work is to put in place a variety of interventions and monitoring arrangements to ensure that priority housing needs are met.

The proposed changes to the housing distribution policy SP7 are consequential of proposing a lower housing requirement. It is considered that the changes will have no material impact on equality, diversity, cohesion and integration in Leeds.

Update Affordable Housing Policy H5. This policy expects new market housing developments to provide an element of affordable housing. New evidence of the SHMA 2017 shows a high level of need that could justify raising the targets for affordable housing provision. However, the viability testing of the CSSR policies shows that there is limited scope to increase the targets without reducing other planning policy requirements for housing development, such as provision of green space or requirements for dwelling space standards and accessible housing. A limited change of 5% to 7% for City Centre and Inner areas is thus proposed. Therefore, the proposed change to Policy H5 seeks to optimise delivery of affordable housing within the constraints of viability testing and national planning policy. It is acknowledged that households in need of affordable and social housing are likely to have stronger representation with certain groups of protected characteristics such as race, age and disability. The Policy can therefore be seen advance the equality of opportunity in certain protected characteristic groups in particular it allows access younger people access to the housing market. The policy also tries to align with emerging national policy in relation to the build to rent sector.

- ii) 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.
- iii) New Housing Access Standards are proposed in Policy H10. This will require proportions of new dwellings to be designed to be more accessible. These standards will bring advantages for older people and disabled people in widening the availability of dwellings suited to their needs but will benefit all protected characteristics to include younger people. The Policy can therefore be seen advance the equality of opportunity in certain protected characteristic groups.
- iv) Green space Policy G4 is proposed to be amended. This policy seeks provision of

green space in association with new housing developments. The review is proposing that the quantity of green space required is reduced to improve delivery. Whilst the quantum of green space is being reduced this needs to be balanced with delivery and viability. If more schemes can deliver green space overall then this will have a positive impact. The policy is also being revised to be more responsive to the particular green space needs of the different localities of Leeds. This reflects differences between inner densely developed areas where existing green space is under pressure and outer areas where there is more land to provide green space. Reduced provision of green space will impact differentially on equality groups. Older people and families with young children will benefit from green space close by, within easy walking distance. Children benefit from availability of play-space. Green space can also be important for inclusion, providing a resource where people can meet. Quality and usability of green space is also important and can have an impact on all the protected characteristics. Quantity and quality of green space can also impact on good mental and physical health and general wellbeing. Minor amendments are being made to G5 and G6 to add clarity to the Plan.

- v) Update Policies EN1 and EN2 in accordance with Government advice, which reduces down the former 'Code for Sustainable Homes' requirement from that which is currently set out in the policies. National policy change in 2015 made this necessary. Wording giving this effect is already available on the Council's website. In terms of equality impacts the impact is similar to that of the existing policy.
- vi) New Policy EN8 is likely to promote the use of electric vehicles. Whilst it is accepted that in certain shared and other situations the lack of sound of electric vehicles can cause difficulties to older and disabled users it is believed that mitigation through good design coupled with the overall sustainable and health benefits of the Policy for all users (pollution etc.) mean that this Policy is likely, on balance, to have a minimal negative equality impact. Also a Policy intention behind this is the overall reduction of CO² emissions to help air quality as a basis to contribute to the Council's overall commitment to improve air quality and the benefits this bring to public health. Consequently the inclusion of this within the CSSR make a positive contribution to protected characteristic groups that may suffer as a result of poor air quality.

- **Actions**

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). Without evidence of need, policy standards can be challenged as unnecessary or diluted. The SHMA 2017 provides robust evidence of need for affordable housing and for accessible housing standards. Leeds has a Local Space and Recreation Assessment demonstrates needs for different types of green space across Leeds.

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		25 th May 2018

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:
For Delegated Decisions or Significant Operational Decisions – sent to appropriate Directorate	Date sent:
All other decisions – sent to equalityteam@leeds.gov.uk	Date sent: