

# Appendix 8



## 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: Policy &amp; Plans</b>
<b>Lead person: Nasreen Yunis</b>	<b>Contact number: 01133787640</b>

### 1. Title:

#### Remittal of the Site Allocations Plan

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 Impact Assessment Screening (EIA) relates to the Leeds Site Allocations Plan (SAP), previous EIA screenings have been undertaken at key appropriate stages of the SAP process and this EIA is consistent with previous ones. The Site Allocations Plan is one of a series of Development Plan Documents (DPD) prepared by the City Council, as part of the Local Development Framework (LDF). The scope and purpose of the Site Allocations Plan includes setting out the detailed location of new housing for the whole of the District.

The Site Allocations Plan (SAP) was adopted by Full Council on 10th July 2019. Following a successful Legal Challenge by Aireborough Neighbourhood Forum in relation to allocations on Green Belt land proposed for housing within Aireborough the Council is required to remit 37 Green Belt sites (including one mixed use allocation) back to the Secretary of State and the Planning Inspectorate for further examination. This equality screening considers the equality implications of the removal of the 37 sites from the Plan in the context of new housing need evidence.

### 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)

Following a successful Legal Challenge by Aireborough Neighbourhood Forum in relation to allocations on Green Belt land proposed for housing within Aireborough, the Council is ordered to remit 37 Green Belt sites (including one mixed use allocation) back to the Secretary of State and the Planning Inspectorate for further examination. The implications of this are that the 36 site allocations for housing and 1 mixed use allocation would be removed from the Site Allocations Plan. In considering the equality implications and giving due regard, there are a number of considerations.

At previous stages of the SAP equality considerations have been an integral part of the process. A reduction in sites has now meant a lower number of sites, in particular all these sites are within the greenbelt. Leeds' housing needs is still met despite this reduction, there is currently around a 6.8 years housing land supply and a district wide surplus of approximately 11,000 units to 2028. The proposal for remittal to the Secretary of State is to delete all 37 allocations and retain each as Green Belt to 2028 is informed by up-to-date housing evidence.

The SAP has undergone public consultation at all key stages and subject to Executive Board approval the proposed Main Modifications and supporting documents will be subject to 6 weeks public consultation (week beginning 4th January 2021) before the SAP is remitted to the Secretary of State for further examination.

The Site Allocations Plan needs to be in conformity with the Core Strategy. It directly builds on the parameters for growth, including the broad distribution across the District as set out in the Core Strategy (adopted on 12th November 2014), and its key focus is to deliver on the Core Strategy's principles of sustainable development. In addition 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 sector within the community are minimised or counter balanced by other measures.

- **Actions**

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

This section examines in more detail how equality considerations in relation to the protected characteristics have been considered at this stage of the SAP. The policy objectives of the Adopted SAP remain. The revised approach in respect to the 37 Green Belt allocations reflects the updated housing supply evidence since SAP adoption and maintains the focus of development on more accessible locations and rebalances the mix of brownfield and greenfield housing land supply. In considering the impact on the protected characteristics in terms of mitigation a number of key areas have been considered.

All sites make a contribution to planning policy requirements. The need for affordable housing (which in particular can impact those on lower incomes, ethnic minorities, and the young), is generated by all sites. However given the overall number of sites has been reduced then lower affordable housing is generated because the supply from non-Green Belt sites exceeds the plan requirement for housing. Up to date evidence on housing need

has informed the current process. Site allocation through the SAP is not the only means of securing affordable housing, provision through other routes such as regeneration programmes, housing programmes and neighbourhood plans for local need also exist.

In terms of the impact on other protected characteristics, three of the allocations are identified as potentially suitable for older persons housing/independent living. The removal of the sites from the greenbelt is based on evidence that the supply from non-Green Belt sites exceeds the plan requirement and consequently there are fewer opportunities in those local areas that are affected by the removal of the allocations. In terms of mitigation the SAP identifies a range of sites across Leeds that exceed overall housing needs. In addition there are other routes of delivery such as regeneration schemes, neighbourhood plans, and policy support (policy H8) within the Core Strategy. Core Strategy Policy H4 also requires that all residential applications provide an appropriate housing mix. This provides the opportunity to create a range of different housing types and sizes in different locations across the district.

One site was allocated as a mixed use allocation for housing and employment. In terms of the protected characteristics employment use can impact all protected characteristics however it is noted that the Judgment made no determination on the suitability of the 37 sites, but concluded that the release from Green Belt was to be dependent upon the re-examination of the policy status of need for sites to be released at this time based on district-wide requirement.

Any future delivery of development on sites will be dependent upon all relevant planning considerations, including the need to meet any updated housing or employment needs.

Five of the 37 allocations include school allocations, however these sites (along with a number of other school allocations) were allocated to respond to the need for school places arising specifically from the new housing proposed by the SAP. As a result of the 37 allocations being proposed to be removed (amounting to an indicative capacity of 4,070 units) Childrens Services have been consulted on the option to remove the school allocations. They have advised that the school allocations were identified to accommodate additional school places arising from the new housing itself. As such, should the housing sites not be allocated, the school allocations will not be needed.

In addition a Sustainability Appraisal has been undertaken. The Sustainability Appraisal of the SAP assesses the effects of the site allocations against the SA objectives. It is a necessary legal requirement to assess all reasonable alternatives taking into account the objectives and geographical scope of the plan. In conclusion due regard has been given at this stage of the SAP to all key areas affecting protected characteristics, the original evidence base has changed and there is not a disproportionate effect on any particular equality characteristic.

**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
M Elliot	Head of Strategic Planning City Development	27/11/20
<b>Date screening completed</b>		

### 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: