

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 or 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: Caroline Harris	Contact number: (0113) 3788072

1. Title: Interim Statement of Community Involvement

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 Interim Statement of Community Involvement (SCI). The SCI is a statutory document (required under the Planning and Compulsory Purchase Act 2004) and sets out how residents and other stakeholders will be engaged and consulted on the preparation of planning policy documents, neighbourhood planning and planning applications. Community engagement is integral to good planning decisions as the planning system operates in the public interest. A local authority's duty to carry this out is enshrined within a Statement of Community Involvement (SCI).

As a result of the Covid-19 pandemic it is no longer possible for consultation on Local Development Documents to be able to comply with the Authority's existing Statement of Community Involvement which was adopted in 2007. The Statement of Community Involvement has therefore been updated with an Interim document to enable consultation to continue to take place in the short term during the Covid-19 restrictions,

as set out by Government Statutory Instruments which allow councils to continue to make relevant planning documents available online rather than being required to provide hard copies. During the period of restrictions we will continue to draft and consult on a full revised SCI until it can be introduced, monitor how well consultation and engagement is taking place within the service, explore new ways of using digital technology and improve local intelligence on the particular needs of the diverse communities around Leeds, including taking into account how Covid-19 has affected their ability to engage with the planning system and how the Council can address this moving forward.

This equality screening considers the equality implications of adoption of the Interim Statement of Community Involvement.

3. Relevance to equality, diversity, cohesion and integration

All the council's strategies and policies, service and functions affect service users, employees or the wider community – city wide or more local. These will also have a greater or 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)

The SCI covers engagement and consultation on all planning matters throughout the city, from the preparation of Development Plan Documents and Supplementary Planning Documents to Neighbourhood Plans and Planning Applications. There are a number of potential restrictions to normal services currently due to both Government guidance during the Covid-19 pandemic, Council protocols and changing local restrictions and the Interim SCI concentrates on what methods for consultation and engagement the Council can use during this period. These will be kept under constant review as restrictions on movement and social distancing are subject to change at short notice. The restrictions that may be in place during the period of this Interim SCI could involve the following:

- Council offices and venues such as libraries and community hubs may be closed to members of the public and possibly staff.
- Hard copies of documents may not be available for access by the public.
- The Council's ability to send letters, and the ability of residents to receive letters, may be limited and postal delays may cause delays to services.
- Due to the challenges of the Covid-19 pandemic on staff and the impact of restrictions on normal ways of working, there may at times be some delay in service delivery.
- Face to face meetings, workshops, presentations etc. will be suspended.
- Face-to-face plans panel meetings, appeal hearings/inquiries and public examinations will be suspended.
- Site visits will only take place if they can be carried out safely in line with the Government's guidance on social distancing.

The wide variety of planning documents prepared by the Council are set out in 'The Local Development Scheme' (LDS). The LDS gives an overview of what the planning policies are for the Leeds district, and sets out the current documents which form the Local Plan for the district ([Adopted Local Plan](#)). The **Local Plan** for Leeds currently comprises a number of statutory development plan documents. These set out strategic policies, allocate sites for development and set policies for decision making on planning applications. Due to the current restrictions as a result of the Covid-19 pandemic the scope of any consultation and engagement activity will be limited for the foreseeable future, with temporary changes being put in place. There will be a degree of flexibility about this, given the evolving nature of the Covid-19 restrictions locally and nationally. This screening consider how people could be made aware of the preparation of a new

Planning Policy Document, how they could view and understand all the relevant information, how they could submit their views or comments to the Council and how they could receive feedback.

Planning permission is required for many new buildings, alterations or extensions, and changes of use of land or buildings. In Leeds, the planning process is managed by our Development Management services which deals with around 5,000 planning applications per year. The Interim SCI sets out how the Council will consult on planning applications during the period of Covid-19 restrictions. Here we needed to ensure that we are inclusive in making people aware of any new planning application which may impact them, how they could view that application and submit any comments and how they could receive feedback on those comments. The Council has a statutory requirement to consult the public on planning applications, but we endeavour to enable the submission of as many comments as possible to ensure that the determination process is as robust and fair as possible.

The Localism Act 2011 gives local communities the 'right' to prepare a neighbourhood plan. Neighbourhood planning (which includes the preparation of a neighbourhood development order (NDO) or community right to build order (CRtBO)) is a way for local communities to decide the future of the places in which they live and work by having a direct say in where new development takes place, what it should look like and other key planning policy issues that are locally important. The government has been clear that all members of society are required to adhere to guidance to help combat the spread of coronavirus (COVID-19). The guidance has implications for neighbourhood planning including: the referendum process; decision-making; oral representations for examinations; public consultation; and the Community Infrastructure Levy. Whilst most of the preparation of a Neighbourhood Plan and consultation with local communities takes place by the Neighbourhood Forums, it is important to make sure that the Forums have all the right tools and guidance to make this involvement and consultation with their communities inclusive so all groups in the community are reached effectively and can make their views known.

The current restrictions in place and the measures highlighted in the Interim SCI to fulfil our engagement and consultation requirements meaningfully and effectively potentially impacts every person who lives, works or carries out business within the Leeds district and equality considerations have been an integral part of the process of drafting this document. This Interim SCI:

- Details consultation methods to be used during this interim period;
- Sets out what the Council will do to make consultation and engagement on planning matters safe, effective and meaningful while restrictions are in place;
- Continues to provide encouragement to all communities to take part in consultation and engagement on planning matters in Leeds;
- Re-assures communities and business across Leeds that efforts will be made for the planning service to be responsive to changing needs and circumstances during a challenging and unpredictable time.

Given the nature of the SCI, it has been important to involve a wide range of stakeholders in its preparation, to help make the document as relevant and as effective as possible. To

help the Council do this, an 'Engagement Group' was formed in 2019 made up of representatives from a range of community and civic representatives, business representatives and officers and this greatly assisted the preparation of the main, new SCI, and the group will also be involved in the shaping of the main SCI during the interim period. This group has also advised on the Interim SCI document, putting forward many useful suggestions which have been equally helpful in preparing this interim version. At future stages of the SCI consultation will also be held throughout the process.

There is a clear role for planning in delivering against all of the Council's priorities as established through the Best Council Plan. It is anticipated that the adoption of the 'Interim SCI' will deliver against the Council's key strategies as they particularly shape ongoing engagement with communities and individuals, as follows:

- Inclusive Growth Strategy – by providing confidence and clarity to both communities and business to ensure that growth and investment decisions can take place during the interim period with safe, proportionate and appropriate levels of consultation and engagement.
- Safe, strong communities – engagement and consultation on planning matters during the interim period will allow the Council to continue to be responsive to local needs in building thriving, resilient communities.
- The 'Interim SCI' will also play a role in helping to deliver all other Best Council Priorities with its focus on digital inclusion that that will be sensitive to the needs of our diverse communities.

- **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)

One of the central aims of the SCI to make consultation and engagement on all planning matters inclusive and meaningful so every person who wishes to be involved and make their opinion heard can do so. Leeds is no different to other parts of the country where there are some communities who either do not feel engaged with the planning process, or feel unable to make their views heard. Covid-19 and social distancing restrictions mean that this presents an additional challenge but also an opportunity to explore new and different ways to engage and consult. During this interim period we will not only explore and improve our digital presence but also seek to ensure that groups that are often disconnected from the planning process (children and younger people, people with disabilities, older people, those with different language needs) feel valued during this difficult time with positive and pro-active engagement.

As most consultation and engagement will take place digitally during Covid-19 restrictions, and libraries and community hubs may be closed limiting access to public computers and paper copies of documents, this has the potential to negatively impact people who are not online or tech-savvy, which may include elderly residents and those in more deprived-communities more than other groups, as well as people with disabilities such as sight problems, and people who do not speak/read English confidently. These issues have been thought about carefully when the Interim SCI was drafted and considered in terms of equality impacts.

- **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 in the preparation and process of the Interim SCI. It has been acknowledged above that there can be barriers to people getting involved in Council processes and making their views heard. Covid-19 and social distancing restrictions mean that present an additional challenge but also an opportunity to explore new and different ways to engage and consult. The Interim SCI aims to ensure that no group or community in Leeds is disadvantaged during this period, so when drafting the Interim SCI barriers and how these can be overcome have been considered and are detailed below.

The Interim SCI itself will be published in html web page format on the Council's website rather than PDF as used historically, which means that the information will be responsive for tablet and mobile devices, easier to translate into different languages, and can be spoken aloud by screen readers. The approach to communicating in the ways outlined ensure that information will be more accessible, particularly for people with disabilities and people who do not speak/read English confidently, this also links with the Council's Best City ambition to be compassionate and caring.

As part of the Development Plan Document/Supplementary Planning Document stages there are a number of measures in the Interim SCI that show that all protected characteristics are considered. In order to ensure that all sections of a community are reached a variety of flexible methods of notification in the SCI, including social media, community briefings and local media to raise awareness of new DPDs and SPDs. We can liaise with and send targeted information to Parish/Town Councils, Neighbourhood Forums, community groups and groups representing people with protected characteristics to bring information to their attention where considered necessary or requested. Due to current restrictions in place due to the Covid-19 pandemic, the time period for consultations may be extended over the statutory minimum during this interim period to ensure that anyone who wishes to comment has time to do so. Where practicable and appropriate, public engagement may take place in the form of online meetings/presentations/workshops or virtual Q&A sessions. This will positively engage with those who wish to make a formal comment but are unable to by e-mail. This may involve comments being logged over the telephone or consultation documents being mailed out to individuals on request, and we will accept the submission of postal comments. We will send a copy of the Adoption Statement to any person who has been asked to be notified of the adoption of the local plan. This variety of methods of contacting people and allowing people to contact us will mean that all sections of the community, and particularly those with protected characteristics, feel engaged and involved. In addition individual Development Plan Document will be the subject of equality considerations and screening at appropriate stages.

When processing a planning application there are a number of methods proposed in the various stages to establish varied and robust notification and communication with communities during this interim period. The interim SCI proposes to continue to post 'site notices' for planning applications as these are an important and effective means of communication for some, especially those who are not digitally connected. The

submission of postal comments will continue to be accepted to provide an alternative method to online consultation portals. Regard will be had to all representations submitted when the application is assessed and will be detailed in the officer's report. Plans Panel meetings will be held remotely via a virtual platform, and the public can watch them live, online.

Consultation and engagement on a Neighbourhood Plan is carried out by the Neighbourhood Forum or Town/Parish Council concerned and they need to demonstrate that all groups in the community have been sufficiently engaged, such as those without internet access, so more targeted methods may be needed including by telephone or in writing. The Interim SCI demonstrates a commitment to helping and providing guidance to neighbourhood planning groups on suitable methods and how to reach certain groups in the community. There are also requirements in the Neighbourhood Planning (General) Regulations 2012 that require at some stages of the process for neighbourhood planning groups and local planning authorities to publicise the neighbourhood planning proposal and publish details of where and when documents can be inspected. It is not mandatory for copies of documents to be made available at a physical location, they may be held available online. Neighbourhood planning groups are supported in terms of advice on suitable methods that will provide communities with access to physical copies of the documents, such as providing paper copies at 'covid-safe' shops, community hubs or religious buildings.

The Interim SCI and its effectiveness in terms of all consultation and engagement taking place during this period of restrictions will be monitored, particularly through the analysis of data indicating the nature and scale of all comments submitted on planning matters and the collation of compliments or complaints from the public. This will also be reviewed as the full SCI is prepared and consulted on during this Interim period so the positive parts of Interim SCI and those which are working well can be progressed in the longer term and post-pandemic.

In conclusion it is considered that due regard has been given during the preparation of the Interim SCI to all key areas affecting protected characteristics, there is not a disproportionate effect on any particular equality characteristic and as a whole this is a positive document which will promote inclusivity in all planning processes.

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
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 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: