

# 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:</b> City Development	<b>Service area:</b> Policy and Plans
<b>Lead person:</b> Nasreen Yunis	<b>Contact number:</b> 0113 3787640

**1. Title:** Local Plan Update 1 (Publication Draft)

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 Publication Draft stage, a stage approximately halfway through the overall Plan making process. This means that policies have been drafted for the first time, following earlier scoping consultation, and these will then be the subject of public consultation on this Publication Draft. This Local Plans theme is Climate Emergency, and in particular the Plan seeks to introduce new or revised planning policies to help further address the climate emergency, improve health and wellbeing and address the ecological emergency.

### 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"><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).

At Executive Board on the 23<sup>rd</sup> 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 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.

• **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)

Equality has been an integral part of policy formulation for the Local Plan Update from inception. The equality implications of Local Plan Update policies have been considered by topic area. This screening sets out the main considerations as below and is underpinned by a new strategic climate change mitigation and adaptation 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.

#### **CARBON REDUCTION**

##### **Whole Life Cycle Carbon Assessments and Net Zero**

The policy is split into Part A and Part B. Part A requires major applications to submit a whole life cycle carbon assessment that details the carbon emissions associated with the development over its entire lifetime including construction, materials, operation and demolition. It also requires minor applications to consider the materials and construction

methods used. Part B requires all applications to be net zero with regards to the energy required to operate the building. To achieve this, it is recommended that developments are as energy efficient as possible and use onsite renewable generation to supply the remaining energy needs. If not technically possible to deliver the above requirements, then an offsetting through a financial contribution will be sought.

Whilst the policy only effects new development, and therefore inhabitants and users of new dwellings and buildings, it will result in a positive outcome for all protected characteristics who inhabit and use new buildings. These new buildings will be more energy efficient and therefore require less energy to use and heat, which will especially help those who experience fuel poverty during the winter months. As a last resort, the policy will also collect financial contributions that could go toward retrofitting existing Council housing stock or provide money towards renewable energy generation schemes. Again, this will help those who have trouble with energy costs connected to heating their homes. All protected characteristics will benefit from the policy but in particular those on lower incomes, the elderly and the young.

### **Sustainable Construction Standards**

The policy requires all new major residential development to meet Level 4 of the Home Quality Mark and all new major non-domestic application to meet BREEAM Outstanding. The above standards ensure that new development in Leeds is delivered to a high quality in the following sustainable credentials:

- Energy: building operational energy and carbon dioxide (CO<sub>2</sub>) emissions
- Management: management policy, commissioning, site management and procurement
- Health and Wellbeing: indoor and external issues (noise, light, air, quality, etc.)
- Materials: environmental impacts of building materials
- Transport: transport-related CO<sub>2</sub> and location-related factors
- Water: building consumption and efficiency
- Waste: construction and operational waste management
- Pollution: water and air pollution
- Land Use & Ecology: site and building footprint and ecological value and conservation

The policy will ensure that all new development across Leeds is delivered to a consistent high-quality standard that addresses the above sustainability credentials. Whilst it will only impact new development, it will equally have a positive impact on all of the protected characteristic groups who inhabit and use new buildings. The positive impacts will include more energy efficient buildings, that will require less energy to use and heat, and developments that deliver high quality amenity areas and less pollution, which will have a positive impact on people's health. All protected characteristics will benefit from the policy but in particular those on lower incomes, the elderly and the young.

### **Renewable Energy**

The policy promotes the delivery of renewable energy generation, and its infrastructure, in appropriate places within Leeds. The list of criteria that new development will have to meet ensures that new renewable energy generation schemes do not create significant harm on the environment and local communities.

The desired outcome of this policy is to increase the amount of renewable energy being generated and stored in Leeds. Whilst some of the renewable energy may directly feed

into Leeds buildings, energy generated from larger schemes will more than likely feed into the national grid and therefore the direct positive results may not be delivered within Leeds. Where the energy is generated and delivered within Leeds, those using the energy will experience greater energy security from a more sustainable energy supply, which may also be cheaper than reliance upon the national grid and gas. This would be a positive impact for all protected characteristics who use and inhabit the buildings that utilise the energy from Leeds based low carbon renewable sources.

### **District Heat Network**

The policy has been amended from the current Core Strategy (2019) EN4 policy. The policy is unchanged where it requires new development, where technically feasible and appropriate, to connect or design for future connection to a heat network. The amendment to the policy introduces a list of heating technologies that should be used if outside of a viable heat network. These alternative heating technologies include air source heat pumps, ground source heat pumps and shared ground heat exchanges and the policy requires new development to preference to the technology that balances the lowest cost for inhabitants and the lowest carbon used.

The outcome of this policy should see more connections made to the district heating network, a low carbon source of energy, and more sustainable and lower cost heating technologies being implemented in new builds. Whilst the previous version of the policy focussed on areas that could connect to the heat network, which is primarily found within the City Centre boundary, the new version now promotes low carbon and cost heating technology across the whole Leeds district. Whilst the policy is dependent upon the spatial district heat network it will result in a positive outcome and potential to impact all protected characteristics across Leeds, where new buildings connect or use this low carbon heat source.

### **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.

In terms of equality the impact of flooding is geographical or spatial being along the River Aire, River Wharfe and the Wyke Beck, residents living in these areas will benefit from the proposals, it will have a direct positive impact on all the protected characteristics but in particular on those who are elderly, the young and those on lower incomes.

The policy is also about improving and encouraging the use of sustainable drainage systems in new development, this has not been readily taken up by developers. By encouraging a more sustainable drainage system to be used for managing surface water

in preference to conventional systems because of the many other benefits that they bring, particularly for water quality, biodiversity and health and wellbeing this will also have a direct positive impact on the protected characteristics, again in particular this will benefit those who more vulnerable such as the elderly, the young and those on lower incomes.

### **GREEN INFRASTRUCTURE**

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

#### **PROTECTING, MAINTAINING, ENHANCING AND EXTENDING GREEN AND BLUE INFRASTRUCTURE, PROTECTING, ENHANCING AND EXTENDING GREEN AND BLUE INFRASTRUCTURE WITHIN AND OUTSIDE AREAS OF GBI.**

This Policy area seeks to protect, maintain, enhance and extend Green and Blue Infrastructure (GBI), this is a positive improvement aimed at improving the quality of green and blue infrastructure. GBI comprises multi-functional green spaces, both urban and rural, which includes protected sites, woodlands, hedgerows, nature reserves, river corridors, public parks and amenity areas, together with green links, river corridors, ponds, becks and river banks. In terms of the protected characteristics the policy is of benefit to all users through its impact on Climate Change and promotion of quality and good design. Also 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.

#### **Protection of Trees, Woodland and Hedgerows, Ancient Woodland, Long Established Woodland, Ancient Trees, Veteran Trees, Tree Replacement**

Protection and enhancement of our green assets such as trees and woodland provides a positive contribution to our environment. 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 level of Carbon Sequestration (the process of capturing and storing atmospheric carbon dioxide) undertaken by trees is important. Increased Carbon Sequestration helps remove particulates in the air and decrease the amount of Carbon. This makes it easier for people to breathe and contributes to mitigating Global warming. Excessive heat and poor air quality impact all the protected characteristics and as such the policy has a positive impact for all.

#### **GREEN SPACE IMPROVEMENT AND NEW GREEN SPACE PROVISION, QUALITY OF NEW GREEN AND BLUE SPACE, MAINTENANCE OF GREEN SPACE, PROTECTION OF EXISTING GREEN AND BLUE SPACE.**

These policies have the objective of enhancing and maintaining good quality greenspace and assets. Underpinning the principle is the principle of directing Green Space to the areas where it is most needed. Nearby Green Space benefits mental and physical health of all users. Older and disabled people are more likely to benefit from this and access to nearby Well designed Green Space is critical for all protected Characteristics.

#### **PROTECTION OF IMPORTANT SPECIES AND HABITATS, LEEDS HABITAT NETWORK, BIODIVERSITY NET GAINS.**

These policies promote biodiversity and are of benefit to all users through the impact on Climate Change and promotion of re-naturalisation and good design. The policies have a

positive impact on all the protected characteristics but in particular benefit Older People, Disabled People and Pregnant Women through better air quality and better designed environments that are accessible to all.

### **FOOD RESILIENCE**

The policy promotes food growing and associated infrastructure as sustainable practises. The will have a direct positive impact on those who implement the policy and can also benefit those on lower incomes.

### **PLACEMAKING**

#### **ACHIEVING WELL-DESIGNED PLACES, DEVELOPMENT PRINCIPLES FOR HIGH-QUALITY DESIGN & HEALTHY PLACE MAKING, ACHIEVING 20 MINUTE NEIGHBOURHOODS IN LEEDS, LOCATION OF DEVELOPMENT , THE HEALTH IMPACTS OF DEVELOPMENT**

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 and healthy. In particular the policies promote a 20 min walking neighbourhood concept for a sustainable way of life, the role of the policy is an enabling role in creating positive local environments.

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/20 minute neighbourhoods it is vital that accessibility for all users is ensured. This is consistent with all other forms of development and transport planning. Existing policies and legislation will apply and ensure that the particular access requirements of some of those with protected characteristics including those with disabilities or older persons are addressed.

Getting around 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.

Diversity of housing needs to account for different family sizes and structures, accessibility including for wheelchairs, and adaptability, so people can live in the same home as they age (existing local plan policies cover this). Further investment may be needed to ensure that local town centres and neighbourhoods are great places to live, work and socialise in.

The importance of access for all to good quality greenspace is also high and it is important that there are different types of spaces available to cater for different people, including both wider open and smaller more intimate spaces. Spaces and routes planned well for children are often spaces and routes that work for all (as with housing policies, greenspace policies already exist and assessment is covered elsewhere).

20-minute neighbourhoods have the potential to be transformational for everyone but to

achieve this, people must be at the heart of planning, design, and delivery. Each neighbourhood is unique, and its design and implementation will have to be tailored to the specific needs of individual populations. Joined up working across the public, private and third sector is essential, and the voice of local experience will need to be an equal partner.

A 20-minute policy approach focusing growth to locations that are well serviced and promotes easier access to active travel and public transport is likely to have positive outcomes from an equality perspective. However, there could be a tension between transport and urban planning policy where 20-minute neighbourhoods or highly served areas that are closer to the idea of the 20-minute city neighbourhood indicate where it would be easier to create a liveable and healthy neighbourhood, that incentivises active travel to services that are easily accessible to where areas that have fewer services and are further from the 20-minute neighbourhood concept, are often already disadvantaged and highly car-dependent.

The policy approach to health impact assessments provides a new policy which embeds health outcomes into the consideration of new development will be supportive to enabling equality, diversity, cohesion and integration. The overall effect is positive, for example the four aims of the policy collectively seek to ensure that the population of Leeds and the environment in which they live, work and participate in the community is improved and health inequalities addressed. The effect on all of the protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation) overall is positive.

## **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.

Leeds Station: When developing detailed proposals for development in and around Leeds station it will be vital that accessibility for all users is ensured. This is consistent with all other forms of development. Existing policies and legislation (including through building regulations) will apply and ensure that the particular access requirements of some of those with protected characteristics including those with disabilities or older persons are addressed. Therefore, it is likely that the works to the station supported through the Policy (particularly those relating to improved access) will have positive outcomes from an equality perspective. In addition, the policy seeks improvements to some of the key public spaces around the station, including the Dark Arches and the railway arches to the south of Trevelyan Square. It is recognised that the lighting and low levels of activity in these areas currently means that they may not be perceived as welcoming spaces, particularly at night-time. Whilst this is an issue for all, the perception of risk may be particularly felt by those who are (or feel) more vulnerable as a result of their age, disability, sex, sexual orientation, race, religion or belief. As a result, improvements to these spaces may also deliver positive outcomes from an equality perspective.

Mass Transit: The delivery of mass transit and rail infrastructure improvement projects offer potential benefits from an equality, cohesion and integration perspective, with the



improved accessibility brought about by these schemes enabling people to more easily access a wider range of jobs, facilities and services without the need for a car. This is likely to be of benefit to all people, including those with protected characteristics.

Whilst exact Mass Transit routes have not yet been agreed, it is proposed that they will travel through and connect some of the most deprived areas of Leeds. Recognising this, and the potential that this type of infrastructure investment can have, the policy also specifically seeks to ensure that schemes are holistically designed to ensure that their potential to stimulate investment and regeneration is maximised. This is important from an equality perspective, helping to ensure that the positive impacts of mass transit (in particular) extend beyond accessibility, and support investment in, and the wider regeneration of, the places along its routes.

The digital connectivity policy promotes gigabit digital connectivity for all new build development as part of site development. This would ensure that both commercial and residential development meet this minimum requirement and by doing so improve digital connectivity for the City. The policy has a positive impact on equality diversity, cohesion and integration as it improves access to digital connectivity for all. Digital connectivity is a very essential part of our modern lives allowing us greater opportunity for what are now becoming normal patterns in our everyday lives. The policy benefits all for example those working and in employment can work online remotely. Those running commercial businesses need connectivity for the running of businesses. Young people in school and in education need connectivity for homework and for online working.

The Covid 19 pandemic in particular has highlighted the importance of digital connectivity, without it the experience of the pandemic would have been socially isolating, increasing loneliness for many and the economy would have been hit much harder. Older people need the same access to services and opportunities as younger people. Digital poverty is an important consideration, digital connectivity is essential for all and not only those who can afford it, the policy seeks to address this by requiring that all new development has provision benefiting in particular for those on lower incomes. An approach which promotes access to all is supported. There is a disparity between the connection quality of high value and lower value homes, where more expensive homes are more likely to receive full fibre connections.

- **Actions**

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

Due Regard has been given to all the protected characteristics, the Local Plan Update has integrated equality from the outset as set out in the section above. Some of the policies are revisions and changes to existing policies and others are new policies. 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 Local Plan Update consultation, 'Your Neighbourhood, Your City, Your Planet' commenced on 19th July 2021 for 8 weeks until 13th September 2021, the consultation

was an early 'scoping' consultation on the topics in the Local Plan Update. Within these topics specific ideas regarding potential policy areas were provided, in order to give some focus for discussions and comments. The consultation focused on these initial ideas and provided the opportunity for respondents to agree/disagree any part of the material and include their own ideas, suggestions and evidence.

In total, 760 consultation submissions were made. Of these, 655 submissions were made via Smart Survey links from content on the website. 65 responses were received via email, with the remaining 40 captured on-street by 'Our Future Leeds', as part of their drive to get people in Leeds engaged in the Local Plan Update. Overall, there was very strong support for the proposed scope of the plan. The vast majority (circa 87%) of consultee representations have made it clear that they supported the Plan focussing on the climate emergency, with respondents being encouraged by the proposed direction the Plan will take. Respondents also clearly stated that addressing the climate emergency is the most pressing issue faced by the Council and society at large.

Following approval of this stage of Local Plan Update, the next proposed period of 8 week consultation commences in mid-October 2022. The proposed consultation activities in line with the adopted Statement of Community Involvement, will comprise of the following:

- Website with all documents available
- E-mail notifications to the same list of people and organisations used for the Regulation 18 consultation plus any additional respondents.
- Press release
- Statutory Notice in the local newspaper
- Social media campaign
- Drop-in sessions
- Webinars

Further consultation will be held at future key stages of the Local Plan Update process, and this will also include Examination by an independent Inspector. The policies have also been the subject of a Sustainability Appraisal which assessed the potential environmental, economic and social impact of the policies.

**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
Martin Elliot	Head of Strategic Planning, City Development	1/9/22

### 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](mailto:equalityteam@leeds.gov.uk). For record keeping purposes it will be kept on file (but not published).

<b>Date screening completed</b>	
If relates to a Key Decision - <b>date sent to Corporate Governance</b>	
Any other decision – <b>date sent to Equality Team (equalityteam@leeds.gov.uk)</b>	