

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: Forward Planning &amp; Implementation</b>
<b>Lead person: David Feeney</b>	<b>Contact number: 2474539</b>

<b>1. Title: Site Allocations Plan – Issues and Options</b>
Is this a:
<input checked="" type="checkbox"/> <b>Strategy / Policy</b> <input type="checkbox"/> <b>Service / Function</b> <input type="checkbox"/> <b>Other</b>
<b>If other, please specify</b>

<b>2. Please provide a brief description of what you are screening</b>
<p>The Site Allocations Plan is one of a series of Development Plan Documents (DPD) being prepared by the City Council, as part of the Local Development Framework (LDF). The scope and purpose of the Site Allocations Plan is to set out the detailed location of new housing, retail, employment, and protected greenspace and the associated site specific policies over the plan period to 2028. It directly builds on the parameters for growth including the broad distribution across the District as set out in the Core Strategy, and its key focus is to deliver on the Core Strategy’s principles of sustainable development. The Core Strategy sets out the broad strategic policy approach for the District and against this framework, the Site Allocations set out the emerging options for potential sites.</p> <p>The Core Strategy has been prepared within the context of National guidance and the Local Development Framework Regulations and has been submitted for independent examination (26<sup>th</sup> April 2013). In preparing the Strategy, the document has been the</p>

subject of Equality Impact Assessment Screenings (EIA's) at 2 stages (the Publication Draft and Pre Submission Draft stages). The Core Strategy EIAs screen the impacts of policies on equality strands. As the Site Allocations Plan helps to take forward, in detail the broad approach of the Core Strategy, it is not appropriate to screen the overall impact of the allocations District wide or the quantum of allocations in each Housing Market Characteristic Area. Planning applications for development on specific sites will need to demonstrate how proposals meet the objectives and policies of the Core Strategy. The Site Allocations screening should therefore concentrate on decisions about specific sites and judgements in choosing between sites in the same area.

The Site Allocations Plan is at an early stage. An 'Issues and Options' document has been prepared for public consultation, where the documents present a range of options relating to sites (these are not specific allocations at this stage), as a basis for public consultation. The site options have emerged through a City Council selection process, within the overall scope of the Core Strategy and Site Allocations plan (relating to Town Centre boundaries and frontages for Retail and sites for Housing, Employment and Greenspace), to identify future potential and to discount sites where these are not considered to be appropriate. It is important to note that the Plan will be subject to further public consultation and independent examination and are therefore open to further review and change depending on representations received. Therefore this is not the final decision on which sites are to be allocated and an EIA screening will need to be carried out at future stages, as the Site Allocation Plan progresses to adoption. At present the Site Allocations Plan also does not identify how to mitigate issues on specific sites e.g. through requirements on density, design, access, provision of on-site facilities etc, and again these matters will be addressed at later stages of the Plan (and within the context of further guidance from technical consultees)..

### 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?	✓	
Have there been or likely to be any public concerns about the policy or proposal?	✓	
Could the proposal affect how our services, commissioning or procurement activities are organised, provided, located and by whom?		✓
Could the proposal affect our workforce or employment practices?		✓
Does the proposal involve or will it have an impact on <ul style="list-style-type: none"> <li>• Eliminating unlawful discrimination, victimisation and</li> </ul>	✓	

harassment <ul style="list-style-type: none"> <li>• Advancing equality of opportunity</li> <li>• Fostering good relations</li> </ul>		
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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**.

<p><b>4. Considering the impact on equality, diversity, cohesion and integration</b></p> <p><i>If you can demonstrate you have considered how your proposals impact on equality, diversity, cohesion and integration you have carried out an impact assessment.</i></p> <p><i>Please provide specific details for all three areas below (use the prompts for guidance).</i></p> <ul style="list-style-type: none"> <li>• <b>HOW HAVE YOU CONSIDERED EQUALITY, DIVERSITY, COHESION AND INTEGRATION?</b></li> </ul> <p><i>(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)</i></p> <p>Alongside consideration of equality and integration through this Screening, the Council is required to undertake a Sustainability Appraisal (SA) of a Development Plan Document (DPD) under section 39 of the Planning and Compulsory Purchase Act 2004, which incorporates the requirements of the European Directive 2001/42/EC (the EU Strategic Environmental Assessment or 'SEA Directive'). The SEA Directive was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 ('SEA Regulations'). Sustainability Appraisal has been (and will be again at later stages) undertaken on each site in order to help determine which should be allocated for development. Therefore to a certain extent the equality screening requirements are included within this as a specific planning process. The SA takes into account factors directly relevant to equality and integration such as access to local services including education and health facilities, community participation and cohesion, and the transport network. Where issues have been identified the purpose of the site sieving exercise including the sustainability appraisal is to either exclude sites for allocation which do not score well, or to require mitigation if they are allocated, e.g. to require facilities to be provided as part of the development of the site.</p> <p><u>Key elements of the SA relating to equality and integration:</u></p> <ul style="list-style-type: none"> <li>- <i>Employment – location, existing use</i></li> <li>- <i>Health - accessibility of site to existing primary health facilities</i></li> <li>- <i>Culture and Leisure - proximity to cultural and leisure facilities</i></li> <li>- <i>Community cohesion - Consider the relationship of the site to the existing area, e.g. scale of site in relation to the scale of the existing settlement and loss of existing community facility (e.g. sports club, allotments)</i></li> <li>- <i>Greenspace - accessibility of sites to existing greenspace. Increase in quantity and quality, delivery mechanism (Community Infrastructure Levy /Section 106 Agreements) and detailed site considerations. Negative score if would be building on an existing</i></li> </ul>
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*greenspace use.*

- *Flood risk*

- *Transport and accessibility including by public transport, and locally met facilities.*

In relation to **housing**, the Site Allocations Plan needs to identify land to accommodate a total requirement of 66,000 dwellings, plus additional land taken out of the green belt as 'protected areas of search'. The process started out with 1092 housing, 521 employment and 2902 greenspace sites being identified. It is clearly therefore impossible to identify specific equality issues for each site in this Screening. However, to an extent, this has been done as part of the general screening/sieving process for classifying the sites, and thereby reducing the original number of proposed sites suitable for development. Initial criteria were used for this process which included such aspects as flood risk, conservation designation, and tree cover, but crucially in relation to equality and integration this included removing sites that do not fall within the settlement hierarchy (a division of settlements in rank according to population, services and size), as these have less access to local services and employment. Sites have been colour coded:

- Green: sites - which have the greatest potential to be allocated for housing.

- Amber: sites - which have potential but there may be issues which need to be resolved, or the site may not be in such a favoured location as those highlighted in green.

- Red: - sites which are not considered suitable for allocation for housing.

The outcome is that at Issues and Options stage, a wide range of sites have been identified as green, amber and red, to enable choices to be made.

In a similar manner sites potentially to be allocated as **employment** were assessed and classified as red, amber, green, which bore in mind particularly the need to maintain and/or provide local employment, which has a positive impact on all equality groupings.

Sites for potential **retail** were identified through a slightly different process as national policy has a sequential approach (consideration of centre sites first, then edge of centre, before out of centre sites), based on a 300m radius around the centres identified in the Core Strategy. Opportunities for allocations within these areas were considered and this fully aligns with the overarching principles in the Core Strategy of sustainability in terms of grouping facilities together and retaining vitality and viability of centres. These locations generally have the best access by public transport which allows for the best access by all sectors of society including those with less access to private cars which is more likely to be women, excluded communities, people with disabilities, and elderly people.

In 2008/09 the Council undertook an audit of **open space, sport and recreation** facilities and an open space, sport and recreation needs assessment, across the District. These were combined into the final 'Open Space Sport and Recreation Assessment' (2011) which outlined the proposed local standards for greenspace, compared them to the existing provision, and identified areas of deficiency and surplus. If the needs and expectations of local communities are fully understood, provision of appropriate local green space and sport and recreation facilities can act as a catalyst for regeneration and help to reduce social inequalities and address issues of deprivation. The Study identified 11 types of open space; parks and gardens, natural, green corridors, amenity greenspace, outdoor sports facilities, provision for children and young people, allotments, cemeteries, private gardens open to the public, indoor sport and recreation, and civic spaces.

Therefore the sites identified in the Site Allocations Plan for retention/allocation for greenspace were originally identified in the Open Space Study. Some of these sites may be more suitable for housing when taking into account the range of competing factors and the deficiency and surplus when assessed against the standards, these proposals will be taken forwards in future stages of the Plan. This will include specifying the particular typology for each greenspace site. It is critical that green space of the correct type, with the required facilities is provided in the right locations if the positive benefits towards people's physical and mental health and well being are to be secured. Adequate greenspace is also essential to adapt and mitigate the effects of climate change.

### **Consultation Procedures**

As the Site Allocations Plan is subject to public consultation, the consultation procedures undertaken will also be a factor in determining impacts on equality. The Issues and Options consultation will be carried out in accordance with the Council's adopted Statement of Community Involvement (SCI). Collectively, the measures set out in the SCI ensure that a wide range of people and businesses will be made aware of the progress of the Site Allocations Plan, so that a broad range of views can be taken into account as progress is made towards adoption. All relevant stakeholders on the Council's LDF mailing list will be notified when the Issues and Options is available for consultation, alongside publication on the website and in all libraries and One Stop Centres to raise awareness of the consultation. There will be stakeholder events held during the consultation process. All comments received during consultation on the Issues and Options will be considered and reported, with a response given, and changes made where appropriate. A separate Consultation Strategy has been produced that addresses these issues more fully.

- **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)*

Progressing with the Site Allocations Plan will assist the authority to achieve the vision for sustainable development that is set out in the Core Strategy. The Core Strategy has been the subject of Equality Impact Assessment Screenings at appropriate stages (Publication draft and pre-submission). At Pre-Submission stage further changes were made as a result of a 6 week consultation. The Site Allocations plans will also follow a similar process and further changes will be made, as a result of the consultation process. Equality considerations have been part of the process in the preparation of the Core Strategy and will be monitored as part of an Authority Monitoring Report (AMR) as set out in the 'Actions' section at the end of this document.

In summary, officers have considered all of the equality strands. This initial review does not raise any particular equality issues or differential impact on groups with equality characteristics. For instance, there is no obvious evidence that the allocation of specific sites will have a different impact on different age groups, as it is policies set out in the Core Strategy which address such factors as lifetime homes, affordable housing, and housing mix. Similar issues apply to the other equality groupings at this Issues and Options stage in the Site Allocations Plan.

In identifying a red, amber, green rating for site options (as outlined in the previous section), key criteria included public transport accessibility and access to services. The following points are therefore key findings in relation to these broad parameters. Transport has been given the greatest level of detail as set out below as it has an overarching impact on other topic areas as accessibility is one of the key considerations for equality.

## **Transport**

### *Gender*

Fewer women drive than men, and women drivers are likely to have less access to the use of a car. Consequently, women often have a greater reliance on walking on footpaths and local roads. Women more frequently have primary responsibility for the care of their children, which often exacerbates problems regarding access to travel, as they may need to combine escorting children to school or childcare with travel to work, shopping or other activities, involving trip chains to multiple destinations.

Despite men (particularly young men) being the most frequent victims of violent crime and assault, women have greater concerns regarding personal safety. Although broad measures to increase public transport use may increase informal surveillance and deter acts of violence, it is outside the scope of the Site Allocations Plan Issues and Options to specifically improve women's personal safety when travelling.

### *Disability*

Disabled people travel more frequently by bus than others, so public transport plays a vital role in ensuring that they can participate in community life and avoid social exclusion. Overcrowding and disruption of services on public transport is a deterrent to travel for disabled people. Taxis also are used disproportionately by disabled people.

### *Race*

Differential access to the transport system and the effect of transport policies, particularly for Black, Asian and Minority Ethnic people are around impacts on access to employment, education and training, which are vitally important issues for BME communities as a means of overcoming disadvantages in the job market. One of the reasons for this is greater reliance of BME communities on public transport, and a consequent difficulty accessing more remote employment locations. People from BME groups often have increased safety concerns about using public transport, particularly at night, yet BME groups are more likely to be involved in shift work or making journeys to non-mainstream venues at unsocial hours.

### *Age*

Young people rely very much on public transport, although many have personal security concerns when using public transport and this is coupled with the fact that in terms of actual risk they are the age group which are most likely to be the victims of violence and/or assault. Many older people are not able to drive because health conditions related to their age or find the cost of running a car prohibitive. Consequently, public transport often plays a vital role in enabling participation in community life for older people. Planned improvements to strategic connectivity and the reliability of public transport will benefit people in both these younger and older age groups. Older people are disproportionately more likely to be living in poverty and suffering the associated effects of low quality and inappropriate housing. Older people require access to a range of facilities and services within their local area. Older people also have a higher

incidence of long-term ill health. It is important therefore that they are able to gain access to healthcare facilities and preventive health and well being services by public transport accessible within walking distance.

#### *Social Deprivation/Exclusion*

The increased emphasis on walking and cycling has the potential to benefit people on low incomes and identifying new housing sites which are well located in relation to existing settlements and the main urban area will enable best access to employment and facilities.

In identifying site options for **housing**, it is important that sites avoid areas of flood risk which would present a concern for all the community, including the most vulnerable. Sufficiency of supply of housing will be of greater importance to the young who are more likely to form new households and generate a need for new housing. Housing schemes particularly aimed at elderly people should be located within easy walking distance of town or local centres or have good access to a range of local facilities. In later stages of the Site Allocations Plan land will be identified which would be particularly appropriate for sheltered or other housing aimed at elderly people. In a similar manner the accommodation needs for Gypsies and Travellers will be identified on an equal basis with the accommodation needs of the house occupying population and the subsequent criteria for site selection should not be over-restrictive.

Identifying sites for **employment** seeks to aid the growth and diversification of the Leeds' economy which should improve job prospects, availability and increase skills/training opportunities for a range of businesses. Improving prospects and diversity of jobs should help to reduce unemployment which in turn should result in an increase of opportunities for all ages, including different ethnic groups. Training and skills opportunities can also be promoted locally.

The **retail** allocations are not considered to give preference to any one group and that all people benefit from the co-location of uses, facilities and services, accessibility of local centres is important. By grouping them together it could lead to groups/communities coming into increased contact and improved accessibility for all. Use of the sites for retail would preclude them being brought forwards for housing or employment.

In some instances, disadvantaged communities have lower levels of access to **greenspace**. By promoting city wide greenspace standards, access for disadvantaged communities without private vehicle access and the disabled will be improved. The protection and enhancement of greenspace provides a positive amenity improvement to all groups. Low income and disadvantaged communities also tend to have lower levels of access to natural habitats which will be important in identifying specific types of greenspace allocations.

#### • **ACTIONS**

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

The following points refer to specific equality groups as a record of current or potential future actions, where groups are not referenced it is considered that no specific actions are necessary as no or neutral equality impacts have been identified.

## **Age**

- Consideration has been given to the housing requirements (including accommodation type) of an ageing population. This will in future stages of the Site Allocations Plan include identifying site specific opportunities for the provision of elderly accommodation.
- Consideration has been given to the provision of play facilities through the development of the Open Space Framework and standards, and translating this into identifying greenspace sites. Specific requirements on individual sites will be developed in future stages of the Plan.
- The need for new school provision has been considered alongside new development and again this will be drawn out more fully in future stages of the Plan.

## **Low income**

### *Positive*

- Consideration has been given to the need to ensure that new developments are sustainable, including being accessible by public transport. This ensures accessibility to services and facilities. This has been an integral element of classifying sites red / amber / green and also in the Sustainability Appraisal Planning for the provision of infrastructure and affordable housing to meet housing needs
- The allocation of sites for development contributes to maintaining and enhancing employment opportunities.
- Sites allocated for housing will also contribute an element of affordable housing.

### *Negative*

- If housing and/or open space is provided for on existing/previous employment sites then this will minimise the opportunities for jobs in that area.

## **Race, Religion**

There are no sites allocated specifically for the provision of community and cultural/religious uses. However these may be identified as necessary on larger site allocations, or would not be precluded as part of larger allocations. Housing sites for Gypsies and Travellers will be identified at a later stage of the Plan.

## **Consultation on the Issues and Options**

As set out above, consultation will be undertaken according to the criteria in the Council's Statement of Community Involvement (SCI). Representations received as part of the consultation process will be taken into account during the refining of the allocations and associated policies. Some more detailed targeted consultation may be undertaken where policy proposals may affect a particular user group or individuals specifically, this is usually location specific. The Council needs to undertake appropriate consultation with specific groups in order that they raise any issues. Although it is not considered that at this stage there will be any negative impact on young people, it is often difficult to engage with younger members of the community and officers will need to consider how young people can become involved in the policy making process. A separate Consultation Strategy has been produced that addresses these issues more fully and this is a key action. Any comments on the proposed consultation at Development Plan Panel and Executive Board will also be taken into account as part of this.

## **Review**

Once adopted, the Core Strategy will be subject to an annual review through the Authority Monitoring Report (AMR). The AMR will use a series of indicators to determine whether the Plan is being implemented appropriately in delivering its objectives and seek

to identify if it is having its intended effect. The AMR offers an opportunity to gauge whether the Core Strategy is being implemented appropriately and that the anticipated effect of implementation is being achieved.

**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

**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.  
  
Please send a copy to the Equality Team for publishing.

<b>Date screening completed</b>	<b>22<sup>nd</sup> April 2013</b>
<b>Date sent to Equality Team</b>	
<b>Date published</b> (To be completed by the Equality Team)	