

# Core Strategy Partial Review

## Scoping Report

January 2019

## Equalities Impact Assessment



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## About this Document & Consultation

<b>What is this document?</b>	This document sets out the scope for the Equality Impact Assessment (EqIA). The EqIA is used to assess the impact of the proposed policies on different groups in the community. The scoping report sets out the parameters which will be used to assess the plan.
<b>Purpose and scope of the consultation:</b>	We are seeking views on the scope and direction of the CSPR. Any comments provided will be considered and where appropriate be used to help shape the revised policies, along with the requirements of the National Planning Policy Framework (NPPF) and planning guidance.
<b>Geographical scope:</b>	The proposals in this document relate to the Bradford District.
<b>Other Documents:</b>	<p>A number of other documents/assessment will support the preparation of the CSPR, including:</p> <p><b>Bradford Local Plan Core Strategy: Partial Review Scoping Report:</b> Sets out the scope of the Bradford Core Strategy Partial Review (CSPR). It identifies which policies will be reviewed and the key issues relating to those policies. It also sets out the key considerations that the Council will need to take into account when identifying the possible options for addressing these issues, along with the evidence required to inform these options.</p> <p><b>Sustainability Appraisal (SA) (including Strategic Environmental Assessment) (SEA) – Scoping Report:</b> The SA is used to assess the proposed plan to determine if it will help to achieve relevant environmental, economic and social objectives. The Scoping Report will set out the objectives and will include an updated section on baseline data.</p> <p><b>Habitats Regulation Assessment (HRA) – Scoping Report:</b> At this stage this report provides a summary and review of the adopted Core Strategy HRA and details any relevant case law updates as well as the next steps that will be carried out as the preparation of the plan progresses.</p> <p><b>Health Impact Assessment (HIA) – Scoping Report:</b> The HIA is used to assess the impact of the proposals on people’s health. At this stage, the scoping report sets out evaluation frameworks for supporting sustainable healthy communities through policies and allocations.</p>
<b>Timescale of consultation:</b>	This consultation will begin on <b>11 January 2019</b> and end at <b>5pm</b> on <b>22 February 2019</b> .
<b>How to respond</b>	<p>The consultation will be carried out in accordance with the Council’s Statement of Community Involvement (SCI) and national guidance.</p> <p>The consultation documents will be made available on the Bradford Council website. Paper copies of the documents will be provided at the following locations and will be available to view during normal opening hours:</p> <ul style="list-style-type: none"> <li>• Britannia House</li> <li>• Bradford City Library</li> <li>• Bradford Local Studies Library</li> <li>• Keighley Town Hall</li> </ul>

	<ul style="list-style-type: none"> <li>• Keighley Library</li> <li>• Shipley Library</li> <li>• Bingley Library</li> <li>• Ilkley Library</li> </ul> <p>If you wish to make a representation to the consultation please visit: <a href="http://www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/">www.bradford.gov.uk/planning-and-building-control/planning-policy/core-strategy-dpd/</a> to complete the online survey or download documents, including the comments form.</p> <p><b>Email:</b> <a href="mailto:planning.policy@bradford.gov.uk">planning.policy@bradford.gov.uk</a></p> <p>(Please title your email 'Core Strategy Partial Review')</p> <p><b>Post:</b> Core Strategy Partial Review, Department of Place, Local Plans Team, 4<sup>th</sup> Floor, Britannia House, Bradford, BD1 1HX</p>
<b>Enquiries</b>	<p>If you have any enquiries regarding this consultation please contact the Local Plans Team.</p> <p><b>Email:</b> <a href="mailto:planning.policy@bradford.gov.uk">planning.policy@bradford.gov.uk</a></p> <p><b>Phone:</b> 01274 433679</p>
<b>Confidentiality and data protection</b>	<p><b>Data Protection Act 2018</b></p> <p>Personal information provided as part of a representation cannot be treated as confidential as the Council is obliged to make representations available for public inspection. However, in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 the personal information you provide will only be used by the Council for the purpose of preparing the Local Plan.</p> <p><b>Local Plans Privacy Statement</b></p> <p>Sets out how the City of Bradford Metropolitan District Council (CBMDC) Local Plans team processes your personal data. This notice should also be read in conjunction with the Council's Corporate Privacy Notice and other specific service notices, which are available to view at: <a href="https://www.bradford.gov.uk/privacy-notice/">https://www.bradford.gov.uk/privacy-notice/</a></p>

## 1. Introduction

- 1.1 The City of Bradford Metropolitan District Council (the Council), is preparing a partial review of the Core Strategy DPD (CSPR). The existing Core Strategy DPD contains the strategic policies relating the development and changes to the District up to the Year 2030. The Council is committed to providing an equal service for the whole community of the District and will use the process of Equality Impact Assessments (EqIA's) to ensure this happens.
- 1.2 This document has been prepared to accompany the initial scoping stage for the partial review of the [Bradford Local Plan - Core Strategy DPD](#), which was adopted in July 2017 and was supported by an Equalities Impact Assessment<sup>1</sup>. The partial review results from changes to national planning policy and also changes in local circumstances. It is considered that a partial review of the Core Strategy is necessary to ensure that the strategic policies remain up-to-date and effective. The Council is also progressing a twin-tracked Sites Allocations DPD and there is a possibility to use the EqIA to support both work streams.
- 1.3 The Equalities Impact Assessment will be updated as the plan-making process progresses. It will sit alongside other key documents including the Sustainability Appraisal (incorporating the requirement for Strategic Environmental Assessment), Habitat Regulations Assessment and the Health Impact Assessment, as well as a refreshed/updated evidence base.
- 1.4 In conjunction with the adopted Core Strategy the Council published an Equalities Impact Assessment in February 2014.

## 2. Purpose of the Equality Impact Assessment

- 2.1 The purpose of the Equality Impact Assessment (EqIA) is to ensure that equality is placed at the centre of policy development and identifies the likely impact of the Core Strategy Partial Review on the District's communities. The EqIA can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group.
- 2.2 Undertaking equality assessments in support of all decision making helps the Council understand how the policies and services we design and run effect Bradford District citizens, service users and staff from all communities. It demonstrates our understanding of our communities and our staff, and shows how we have considered them in our decision making. It helps us improve our services by ensuring they are relevant and appropriate to our communities and their needs.
- 2.3 Undertaking an equality assessment also fulfils the legal duties placed upon the Council in a transparent manner, and helps us to be accountable to the people that we serve.

### 3. Legal Context

- 3.1 The [Equality Act 2017 Chapter 15](#) requires local planning authorities to pay due regard to a number of equality considerations when preparing and before adopting planning policies. To do this, planning authorities will carry out assessments to ascertain the policies potential impact on equality. The assessments provide a mechanism to provide evidence to show compliance with the [Public Sector Equality Duty \(PSED\)](#)<sup>1</sup>.
- 3.2 The PSED details that public authorities in the exercise of their functions must have regard to the need to:
- a. eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (Equalities Act Para 149<sup>2</sup>)
- 3.3 In order to fulfil the equalities duty, the equality assessment needs to take into account the impact that the proposal being assessed might have on the relevant protected characteristics as defined in the Equality Act 2010. These are:
- age;
  - disability;
  - gender reassignment;
  - pregnancy and maternity;
  - race;
  - religion or belief;
  - sex;
  - sexual orientation.

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<sup>1</sup> Public Sector Equality Duty(PSED) contained in section 149 of the Equality Act 2010, which requires public authorities to have due regard to a number of equality considerations when exercising their functions.

<sup>2</sup> Core Strategy Publication Draft(2014) EIA [108 Pages](#) and Addendum Report to the Core Strategy Publication Draft(2014) EIA [155 Pages](#)

## 4. Council Policy and Approach

- 4.1 It is good practice for the Council to analyse and understand the likely impact of its decisions in terms of equality and inclusion to ensure the district is a place where people are treated with fairness and respect and that they can access services which take into account their individual needs.
- 4.2 Bradford Council's Equality and Diversity Statement sets out the Council's commitment to equality and is detailed below in Box 1.

### Box 1: Bradford Council's Equality and Diversity Statement

This statement outlines the Council's commitment to equality across the district and within the Council. It provides a focus and overview of the Council's commitment of making our district a fairer and more equitable place and improving the quality of life for everyone in Bradford. Reducing inequality and delivering the Council's equality objectives can only be delivered effectively if it is embedded across the organisation and within partnership working.

The Council aims to eliminate discrimination, advance equality of opportunity and foster good relations across all protected characteristics in all its activities including its decision-making, policy development, budget setting, procurement and commissioning, service delivery and employment functions.

The Council recognises the diversity of the people and the communities of the district and is committed to:

- Working with our partners and the district's many communities to understand and meet the needs of individuals and communities, and improve their opportunities, wellbeing and ability to live together productively.
- Tackling areas of potential discrimination to ensure that services, employment and training and development opportunities are offered equitably and appropriately.
- Ensuring that all services provided by or on behalf of the Council are appropriate, inclusive, accessible and fair.
- Involving the wider community, service users, employees and partner organisations in consultation and the impact assessment of policies and financial decisions to ensure that views are taken account of.
- Ensuring that our employees are recognised as our greatest resource and our employment and recruitment policies reflect our commitment to equalities and best practice.
- Striving to achieve a workforce that reflects the diversity of the district.
- Ensuring that all contractors directly supplying goods and services or working on behalf of the Council comply with the relevant equality legislation and promote good practice.
- Building closer links with all communities across the district and using our influence within the local community to giving a lead to other employers, partners and other local agencies to promote equalities.

The Council will ensure that its principles and priorities are informed and underpinned by these commitments.



- 4.3 Undertaking equality assessments in support of all decision making helps the Council understand how the policies and services we design and run effect Bradford District citizens, service users and staff from all communities. It demonstrates our understanding of our communities and our staff, and shows how we have considered them in our decision making. It helps us improve our services by ensuring they are relevant and appropriate to our communities and their needs.
- 4.4 Undertaking an equality assessment also fulfils the legal duties placed upon the Council in a transparent manner, and helps us to be accountable to the people that we serve.
- 4.5 In 2016 Bradford Council committed to new equality objectives to enhance its work and celebrate the diversity of the district. These objectives do not cover everything the Council does in relation to equalities, but identifies a few areas which the Council feels are most important to progressing our equalities approach. These are also directly embedded into the Council's overarching priorities, which are outlined in its Council Plan (2016-2020).
- 4.6 The key objectives are summarised below:
- Community relations – ensure that the people of the district get on well together.
  - Encouraging and celebrating good community relations and active citizenship.
  - Addressing hate and street crime.
  - Employment and skills – promote inclusive growth through ensuring those most disadvantaged in the labour market are able to get the skills they need and access good jobs.
  - Poverty and ethnicity employment and skills programme.
  - Apprenticeship programme.
  - Organisational equalities culture – the Council is well run, fit for business and is fair and inclusive in its approach.
  - Equalities competency and corporate approach.
  - Workforce diversity.
  - Accessible information.
  - Equality data – data better provides the Council with the right insight, evidence and intelligence to make well informed decisions that impact on our communities.
  - Equality monitoring
  - Use of the equality data and information
- 4.7 The Council publishes progress on these objectives on an annual basis through Corporate Overview and Scrutiny Committee reports.

- 4.8 The Council is required by legislation to undertake an equality assessment in the following circumstances:
- when proposing or developing a new policy, strategy, practice, service or function;
  - when reviewing an existing policy, strategy, practice, service or function, and
  - when decommissioning, ceasing or removing a policy, strategy, practice, service or function.
- 4.9 An equality assessment should always be proportionate to the change in question and to the potential equality impact of the changes.
- 4.10 The Council will publish its consideration of equality issues through its formal Committee Reports and when necessary by producing and publishing an equality impact assessment form. Equality Impact Assessments are undertaken annually for the Council's budget setting process and are updated as proposals are considered, decisions made and then implemented.

## 5. The Approach to Equality Impact Assessment

5.1 In line with other report structures such as the Health Impact Assessment, there are particularly headline stages in the EqIA process which are set out below in Table 5.1. This six stage figure reproduces the process undertaken as part of the adopted Core Strategy process, which was informed at the time by guidance from the Improvement and Development Agency (I&DeA) for Local Government.

**Table 5.1: Six Stages of an Equality Impact Assessment**

Stage	Process	Description
1	<b>Initial Screening</b>	This stage determines whether a full EqIA should be undertaken through consideration of a number of questions relating to the potential impact of the strategy. If the work is deemed to potentially cause an adverse impact or discriminate against different groups within the community then an EqIA should be undertaken.
2	<b>Scoping and Defining</b>	This stage defines the scope of the assessment which will take place. It requires an understanding of what the activity is looking to achieve and who will be involved in the assessment process.
3	<b>Information Gathering</b>	The assessment should be based upon up-to-date and reliable information which outlines the current state of the area which uses a variety of sources of information.
4	<b>Making a Judgement</b>	This is the most important element of an EqIA. Information gathered in the earlier stages is used to decide whether or not there is a potential for the policy, strategy, procedure or function to result in a less favourable outcome on any group within the community or unlawful discrimination of any kind.
5	<b>Action Planning</b>	The real value of completing an EqIA comes from the actions that will take place and the positive changes that will emerge through conducting the assessment.
6	<b>Publication and Review</b>	It is a legal requirement to publish the EqIA to allow the public to see that the Council is actively engaged and committed to challenging potential discrimination, as well as improving service delivery. Progress against the action plan should be reviewed bi-annually.

5.2 In line with the Health Impact Assessment, which also accompanies this stage of consultation on the CSPR, there is an intention that the EqIA, will be developed as both a working document and also a hybrid publication - taking into

consideration both policy and site allocation issues over the course of developing the two DPDs.

## Council Approach

### Stage 1: Initial Screening

- 5.3 It was concluded as part of the development of the adopted Core Strategy that the document, including its policies was the concern of the whole of the Bradford District and its communities, including equality groups and therefore an Equalities Impact Assessment would be required.
- 5.4 The suggested scope of the partial review includes a number of key housing and employment policies which are of a strategic nature for the District and its communities. It is therefore similarly concluded that Equalities Impact Assessment will be required for the partial review.

### Stage 2: Scoping and Defining

- 5.5 This initial paper has been developed by officers within the Local Plan team including a lead officer on equalities and community engagement. In line with the original Core Strategy Equality Impact Assessment, it would be beneficial for the inclusion of a wide range of different perspectives and experiences to be used in undertaking the EqlA. It is intended to develop a small focused working group to facilitate this process and support the EqlA work programme as the DPDs progress.
- 5.6 In July 2018, the Ministry of Housing, Communities and Local Government produced the 'National Planning Policy Framework: Equality Impact Assessment' which contains specific references to the policy areas included in the NPPF and will prove useful guidance to link this higher policy level to the local policies of the Core Strategy.

### Stage 3: Information Gathering

- 5.7 The information sources required to inform the EqlA are likely to include:
- Bradford Observatory Collated Data Sets
  - Census Data
  - National and Local Statistics
  - Indices of Multiple Deprivation
  - New local plan evidence material including studies to assess housing (the Strategic Housing Market Assessment - SHMA), , Employment and Open Space Needs
  - Sustainability Appraisal datasets
  - Public Health research and datasets

- Other research / datasets

5.8 There are some common datasets required for the Health Impact Assessment and Sustainability Appraisal and there may be scope to rationale data-gathering across the various reports.

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#### Stage 4: Making a Judgement

5.9 The Equality Impact Assessment will provide an overall judgement of the impact that the Core Strategy Partial Review and Site Allocations DPD will have upon the residents of the Bradford District. This assessment will be available for public comment to test whether the outcomes of this process are supported by the residents, communities and stakeholders who will be affected by the plan.

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#### Stage 5: Action Planning

5.10 The outcomes from the twin-tracked DPD work programme and EqIA working group are likely to support a culture of action learning and planning. A log of issues arising will be used to inform action planning.

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#### Stage 6: Publication and Review

5.11 The DPD documents and policies will continue to be monitored in line with the local publication and government requirements. This monitoring will also need to consider the publication and changes to relevant data sets.

## 6. Equalities Impact Assessment – Reviewing the Scope of the Consultation

6.1 The CSPR is at an early stage of development and this section includes an initial review of the policy areas, which are considered necessary to review as part of this stage of consultation. In general terms the CSPR covers the following policy areas:

- **The Core Strategy plan period** – national policy indicates that the plan should look ahead over a 15-year period. The current Core Strategy plan runs until 2030. It is proposed that the new Core Strategy plan period should be extended from 2030 to 2035.
- **Strategic housing policies** – including setting a new housing requirement (including specialist accommodation needs), the distribution and phasing of new housing across the district, reassessing the levels of affordable housing need and the targets for the delivery of housing on previously developed land, providing more detail on housing quality, including potentially introducing optional housing standards, and considering whether all brownfield and non-green belt land options have been fully and extensively evaluated, when it comes to accommodating sustainable development.
- **Economic growth** – reassessing employment needs and land requirements plus reviewing retail and leisure needs. The council wants to enable a strong and vibrant economy to flourish and businesses need land and premises to support jobs. We need to ensure that the right mix of land is available, in the right locations for a wide range of different businesses.
- **Green Belt** - re-assessing whether there are exceptional circumstances which might justify the need for any changes to Green Belt boundaries. National planning policy places great importance to Green Belts. Council's need to demonstrate exceptional circumstances for changes to Green Belt through plan-making. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.
- **Viability** – ensuring that our delivery and viability policies align with national policy on addressing viability considerations at the plan-making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

6.2 Table 6.1 detailed below uses the Council's standard pro-forma for Equality Impact Assessments.

**Table 6.1: Headline Review: Considered Scope of the Core Strategy Review**

<p><b>Name of Proposal or Policy:</b></p> <p><b>The Plan Period</b></p>	<p><b>Describe the policy under assessment and what change would result if implemented?</b></p> <p>The adopted Core Strategy plan period currently runs from 2013 (the base date) and covers the 17-year period to 2030. The NPPF (paragraph 22) indicates that strategic policies should look ahead over a minimum 15-year period from adoption. The Core Strategy Partial Review will need to establish a new plan period to comply with this requirement. It is likely that the new Core Strategy plan period will be aligned with the housing and employment evidence base and would run for a 15-year period to 2035 from the anticipated date of adoption in 2020.</p>		
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>This proposal is likely to have a no major policy impact on Bradford’s citizens.</p>		
	<p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>This proposal is likely to have a no major policy impact on Bradford’s citizens.</p>		
	<p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>This proposal is likely to have a no major policy impact on Bradford’s citizens.</p>		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), (U) Unknown, for each</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p>	
<p><b>Protected Characteristics</b></p>			
<p><b>Age</b></p>	<p>N</p>		

<b>Disability</b>	N		
<b>Gender Reassignment</b>	N		
<b>Race</b>	N		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	N		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	N		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Main implications relate to services with long term related strategies, such as housing, economic development and transport.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	No evidence collected to date.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>  <b>Policy HO1: The District's Housing Requirement</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>  Policy HO1 establishes the housing requirement for the District for the period 2013-2030. It indicates that a minimum of 42,100 homes should be provided, which equates to a minimum of 2,477 dwellings per annum. The revised NPPF indicates that the minimum number of homes needed in an area should be established in strategic policies and should be informed by a local housing need assessment, conducted using the standard methodology set out in national planning practice guidance (NPPG). The Council has recently commissioned consultants to prepare a new Strategic Housing Market Assessment (SHMA) and Local Housing Need Study to help inform the Core		



	<p>Strategy Partial Review and set out recommendations for establishing the local housing requirement figure. The SHMA will carry out the local housing need assessment using the standard methodology. This will set the minimum number of homes needed in the area. The study will also look at different economic and demographic evidence and make recommendations on whether a higher housing need figure is justified.</p>	
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>This policy is concerned with the total numbers of housing – both market and affordable. The SHMA and housing needs survey will identify particular housing needs and any potential links to people who share a protected characteristic such as age, disability or race. It is too early in the production of local plan evidence to indicate whether this policy area will advance equality of opportunity and / or foster good relations for people who share protected characteristics, but it will provide information and data which will allow the Planning Service to better understand specialist housing needs of particular groups and also indicate whether there have been any significant changes in the nature of need compared to the assessment which underpinned the 2017 Core Strategy.</p>	
	<p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Part of the housing research focuses upon the housing and accommodation needs of gypsies and travellers and other specialist housing need groups. It is too early in the production of the local plan evidence to evaluate the equality impacts.</p>	
	<p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p>	
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>

	high (H) medium (M), low (L), no effect (N), (U) Unknown, for each.		
<b>Protected Characteristics</b>			
Age	U		
Disability	U		
Gender Reassignment	N		
Race	U		
Religion / Belief	N		
Pregnancy and Maternity	N		
Sex	U		
Sexual Orientation	N		
Marriage and Civil Partnership	N		
<b>Additional Consideration</b>			
Low income /low wage	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Main issues are shared with Housing Services.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	The SHMA and Housing Needs Survey will provide updated information on local housing needs.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>		
<b>Policy HO3: Distribution of Housing Development</b>	Policy HO3 sets out the distribution of the housing requirement across the District:  Regional City of Bradford = 66%		

	<p>Principal Towns = 16% Local Growth Centres = 12% Local Service Centres = 6%</p> <p>Evidence from the new SHMA will set out the housing needs for different parts of the district. Potential considerations are likely to include whether the Council maintains the current distribution as set out in Policy HO3 of the adopted Core Strategy, or aligns distribution of growth to reflect a range of issues including new evidence on housing need, Green Belt, site availability and deliverability, flood risk, and infrastructure.</p>	
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>The policy is concerned with the distribution of housing across the district and consideration will need to be given to supporting sustainable development and meeting the needs of the District’s diverse communities. It is too early in the production of local plan evidence to indicate whether this policy area will advance equality of opportunity and / or foster good relations for people who share protected characteristics.</p>	
	<p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p>	
	<p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p>	
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>

	<b>each.</b>		
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Main issues are shared with Housing Services.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	The SHMA and Housing Needs Survey will provide updated information on local housing needs.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>		
<b>Policy HO4: Phasing the Release of Housing Sites</b>	This policy mainly sets out the approach to the phased release of housing land within the District. The plan period is split into two phases and the policy requires the Site Allocations DPD to allocate sufficient land to meet 8/15 of the housing requirement in the first phase and 7/15 in the second phase. The Council will need to consider whether it is still appropriate to require the phased release of housing sites (and if so through what approach) or whether there is an alternative way		

	of ensuring the managed delivery of new housing in the District, plus any associated infrastructure.		
<p>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</p> <p>(1) eliminate unlawful discrimination, harassment and victimisation;</p> <p>(2) advance equality of opportunity between different groups; and</p> <p>(3) foster good relations between different groups</p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>The policy is concerned with the phasing of new housing across the district and consideration will need to be given to supporting sustainable development and meeting the needs of the District’s diverse communities. It is too early in the production of local plan evidence to indicate whether this policy area will advance equality of opportunity and / or foster good relations for people who share protected characteristics</p>		
	<p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p>		
	<p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p>		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		

<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Main issues are shared with Housing Services.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	No evidence collected to date.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>  <b>Policy HO6: Maximising the Use of Previously Developed Land (PDL)</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>  This policy sets out the approach to delivering the maximum amount of housing on previously developed land (PDL). The policy sets an overall District wide target of achieving 50% of new housing on PDL. It also sets out more specific targets for the four settlement hierarchy tiers: <ul style="list-style-type: none"> <li>• Regional City of Bradford: 55%</li> <li>• Principal Towns: 50%</li> <li>• Local Growth Centres: 15%</li> <li>• Local Service Centres: 35%</li> </ul> The NPPF (paragraph 117) requires strategic policies to set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land. The Government has increased the priority for reusing PDL in the new NPPF. The Council will need to consider the level of priority it gives to the		

	development of previously developed land and how this is balanced with the deliverability of sites. It will also need to determine whether the targets set for development on PDL (district wide and at the settlement hierarchy level) are still appropriate or whether there have been significant changes which will warrant revised targets.		
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>The District has a mixed portfolio of PDL and there may be areas of land which could provide positive outcomes if delivered for local communities, including people with protected characteristics. It is too early in the production of local plan evidence to draw further conclusions at this stage.</p>		
	<p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p>		
	<p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p>		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		

<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Forms part of discussions with Housing Services and Public Health.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	Evidence is in development. Further work is progressing on updates to the Council's land assessment database the Strategic Housing Land Availability Assessment – SHLAA). Work on housing need is also being progressed through the SHMA and local housing need survey. The Core Strategy Partial Review is also being run in parallel with work on Site Allocations to inform the DPD.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>  <b>Policy HO8: Housing Mix</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>  Policy HO8 looks to support the provision of a mix of housing to meet the needs of the District's population. It sets out the following strategic priorities for the types and sizes of housing that are needed:  <ul style="list-style-type: none"> <li>• More family housing</li> <li>• Sufficient affordable housing to meet the needs of people</li> </ul>		



	<p>on lower incomes and first time buyers</p> <ul style="list-style-type: none"> <li>• Increase the supply of larger homes</li> <li>• Increase the supply of accessible homes</li> <li>• Increase the supply of high quality flats</li> <li>• Support the provision of specialist accommodation for older people.</li> </ul> <p>The NPPF requires that the housing needs of different groups in the community are assessed and reflected in planning policies (Paragraph 61). It will be important to identify what types, sizes and tenures are required and which groups have a priority need. The Council will need to consider whether to retain the current housing mix priorities in Policy HO8 or change them based on the findings of the new SHMA.</p>		
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>The policy under review has positive effects in terms of sustainability and life choices. There may be additional positive effects depending upon the outcome of the policy review process and standards supported, and the production of updated evidence of housing needs will ensure that the Council has an up to date understanding of those needs and whether there have been any significant changes since the last SHMA was produced. It is too early in the production of local plan evidence to indicate the extent of any change and impact.</p> <p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p> <p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p> <table border="1" data-bbox="571 1803 1417 2031"> <tr> <td data-bbox="571 1803 869 2031"> <p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate</b></p> </td> <td data-bbox="869 1803 1417 2031"> <p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage</p> </td> </tr> </table>	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage</p>
<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage</p>		

	high (H) medium (M), low (L), no effect (N), Unknown (U) for each.		
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Forms part of discussions with Housing Services, Social Services and Public Health.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	Evidence under development. SHMA and local housing needs survey is progressing which will significantly inform the key policy directions.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>  <b>Policy HO9: Housing Quality</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>  Policy HO9 aims to ensure that new residential developments: <ul style="list-style-type: none"> <li>• Are high quality in terms of design and sustainable construction standards.</li> </ul>		

	<ul style="list-style-type: none"> <li>• Are designed to be accessible and adaptable to support the changing needs of different groups of people.</li> <li>• Provide private outdoor space.</li> <li>• Provide suitable space standards appropriate to the type of home.</li> <li>• Provide adequate storage for bins, recycling and storage.</li> </ul> <p>Local planning authorities can set additional technical requirements exceeding the minimum Building Regulations in respect of optional nationally described space, access and water standards for new homes. In reviewing Policy HO9 consideration will need to be given to the range of possible standards which could be incorporated into the policy and implications.</p>		
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>The policy under review has positive effects in terms of sustainability and life choices. There may be additional positive effects depending upon the outcome of the policy review process and standards supported. It is too early in the production of local plan evidence to indicate the extent of any change and impact.</p> <p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p> <p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p> <table border="1" data-bbox="571 1653 1417 2020"> <tr> <td data-bbox="571 1653 868 2020"> <p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for</b></p> </td> <td data-bbox="868 1653 1417 2020"> <p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage</p> </td> </tr> </table>	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage</p>
<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage</p>		

	<b>each.</b>		
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Forms part of discussions with Housing Services, Social Services and Public Health.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	Evidence in progress. Analysis of impact will need to take into considerable viability implications and links to site delivery and density requirements.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>		
<b>Policy HO11: Affordable Housing</b>	Policy HO11 aims to ensure that there is a sufficient supply of good quality affordable housing distributed throughout the district particularly to the areas of highest need. It establishes the affordable housing targets for different parts of the district. It indicates that the Council will negotiate with applicants to provide the following proportions of affordable housing on-site subject to viability:		

	<ul style="list-style-type: none"> <li>• Up to 30% in Wharfedale</li> <li>• Up to 20% in towns, suburbs and villages</li> <li>• Up to 15% in inner Bradford and Keighley</li> </ul> <p>There is a need to update the affordable housing policy to reflect national planning policy since the adoption of the Core Strategy. The Council will need to consider whether to retain the existing affordable housing targets or change them based on new housing need information and viability evidence.</p>		
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>No policy position has been agreed at this stage and will be subject to further evidence gathering. Affordable housing can have positive effects in terms of sustainability and life choices.</p>		
	<p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p>		
	<p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p>		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>	
<p><b>Protected Characteristics</b></p>			
<p><b>Age</b></p>	<p>U</p>		

<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Forms part of discussions with Housing Services, Social Services and Public Health.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	Evidence under development. SHMA and local housing needs survey is progressing which will significantly inform the key policy directions.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>  <b>Policy HO12: Sites for Travellers and Travelling Showpeople</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>  Policy HO12 makes provision via policies and site allocations to deliver additional pitches for Gypsies and Travellers and plots for Travelling Showpeople for the period to 2030: <ul style="list-style-type: none"> <li>• 39 pitches for the gypsy and traveller communities;</li> <li>• 7 pitches for transit accommodation</li> <li>• 45 pitches for travelling showpeople.</li> </ul> There is a need to update this policy to take into consideration the changing plan period (potentially to 2035) and any changes to demographics and need requirements as established through the SHMA and Local Housing Needs		

	assessment.		
<p>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</p> <p>(1) eliminate unlawful discrimination, harassment and victimisation;</p> <p>(2) advance equality of opportunity between different groups; and</p> <p>(3) foster good relations between different groups</p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>The current policy has potential for significant positive effects in terms of improving quality of life for particular race or ethnic groups. It is too early in the production of local plan evidence to indicate the extent of any change and impact, although the production of an up to date needs assessment will allow the Council to assess whether there has been a significant change in the type or scale of need for these particular groups.</p>		
	<p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p>		
	<p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p>		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	U		

<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	Forms part of discussions with Housing Services, Social Services and Public Health.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	Evidence under development. SHMA and local housing needs survey is progressing which will significantly inform the key policy directions.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or Policy:</b>  <b>Policy EC1: Creating a successful and competitive Bradford District economy within the Leeds City Region</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>  Policy EC1 sets the broad policy context for a competitive Bradford District to support economic prosperity. In particular it looks to support : <ul style="list-style-type: none"> <li>• the delivery of economic growth, restructuring and diversification;</li> <li>• the provision of Grade A office space in Bradford City Centre;</li> <li>• improving the links between job opportunities and skills development;</li> <li>• Modernising the manufacturing industries</li> <li>• A knowledge-driven economy</li> <li>• A more entrepreneurial District</li> <li>• Enhanced transport links between the regional airports</li> </ul>		



	<p>(Leeds-Bradford and Manchester).</p> <ul style="list-style-type: none"> <li>• The potential of non-business class sector as key economic and employment generators.</li> <li>• Opportunities for business relating to the District's unique environmental assets.</li> <li>• ICT and communications infrastructure.</li> </ul> <p>The NPPF requires planning policies to set out a clear economic vision and strategy which positively and proactively encourages economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration. The Council will need to consider whether to retain the existing economic growth priorities or amend them to incorporate the key priorities in the Economic Strategy for Bradford District and the national Industrial Strategy; the initial outputs from the Local Inclusive Industrial Strategy for the Leeds City Region; and the potential economic growth opportunities through the implementation of Northern Powerhouse Rail.</p>		
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>Economic growth can have a positive impact on improving individual life opportunities within communities. . It is too early in the production of local plan evidence to indicate the extent of any change and impact.</p> <hr/> <p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p> <hr/> <p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p> <hr/> <table border="1" data-bbox="571 1865 1418 2027"> <tr> <td data-bbox="571 1865 868 2027"><b>Please indicate (below) the level of negative impact on each of the protected</b></td> <td data-bbox="868 1865 1418 2027"><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></td> </tr> </table>	<b>Please indicate (below) the level of negative impact on each of the protected</b>	<b>How could the disproportionate negative impacts be mitigated or eliminated?</b>
<b>Please indicate (below) the level of negative impact on each of the protected</b>	<b>How could the disproportionate negative impacts be mitigated or eliminated?</b>		

	<b>characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b>	Unknown at this stage.	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	U		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	The Economic Development service forms part of consulted services.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	Evidence work is being commissioned to provide updated to economic forecasts and assessments of the need (scale and type) of employment land. Further analysis is also being undertaken on new strategy directions and associated evidence base.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		
<b>Name of Proposal or</b>	<b>Describe the policy under assessment and what change</b>		

<p><b>Policy:</b></p> <p><b>Policy EC2: Supporting Business and Job Creation</b></p>	<p><b>would result if implemented?</b></p> <p>Policy EC2 supports the delivery of 1,600 new jobs in the District annually to 2030. This will be achieved through the allocation of at least 135ha of employment land over a range of sites in the Site Allocations DPD; implementing major regeneration initiatives; and supporting and improving the vitality and viability of the City Centre.</p> <p>The NPPF indicates that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Updated local economic priorities will also need to be more effectively reflected in the policy position.</p> <p>The evidence to help set out specific options relating to the number of jobs that need to be provided is not yet fully available. The Council will need to consider the approach to determining the number of new jobs which should be provided annually.</p>		
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>Business and job creation can have positive impacts on improving individual life opportunities within communities. It is too early in the production of local plan evidence to indicate the extent of any change and impact, however the updated evidence will allow the Council to develop policies which will both identify the nature of needs and identify land which meets market requirements and thus has a better chance of delivery.</p> <p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p> <p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not been determined at this stage.</p> <table border="1" data-bbox="571 1995 1417 2033"> <tr> <td data-bbox="571 1995 874 2033"><b>Please indicate</b></td> <td data-bbox="874 1995 1417 2033"><b>How could the disproportionate</b></td> </tr> </table>	<b>Please indicate</b>	<b>How could the disproportionate</b>
<b>Please indicate</b>	<b>How could the disproportionate</b>		

	<b>(below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b>	<b>negative impacts be mitigated or eliminated?</b>  Unknown at this stage.	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b>	The Economic Development service forms part of consulted services.		
<b>What evidence do you hold to back up this assessment? Do you need further evidence?</b>	Evidence work is being commissioned on updates to employment land and economic forecasts. Further analysis is also being undertaken on new strategy directions and associated evidence base.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		

<p><b>Name of Proposal or Policy:</b></p> <p><b>Policy EC3: Employment Land Requirement</b></p>	<p><b>Describe the policy under assessment and what change would result if implemented?</b></p> <p>Policy EC3 sets the employment land requirement for the District. It indicates that 135ha of land will be provided for employment use and that it should be distributed in the sub-areas as follows:</p> <ul style="list-style-type: none"> <li>• City of Bradford: 100ha</li> <li>• Airedale Corridor: 30ha</li> <li>• Wharfedale Corridor: 5ha</li> </ul> <p>The distribution of the employment land requirement was based on past delivery rates.</p> <p>The NPPF stipulates that Local Plan policies should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations. The new economic strategy sets out a series of key priorities and sectors, for which space for development and growth will be required.</p> <p>The Council will need to consider the approach to identifying amount and distribution of the employment requirement.</p>
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>The delivery of sufficient levels of employment land can support economic growth and have a positive impact on improving individual life opportunities within communities. . It is too early in the production of local plan evidence to indicate the extent of any change and impact.</p> <p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p> <p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not</p>

	been determined at this stage.		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<p><b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b></p>	<p>The Economic Development service forms part of consulted services.</p>		
<p><b>What evidence do you hold to back up this assessment? Do you need further evidence?</b></p>	<p>Evidence work is being commissioned on updates to employment land and economic forecasts. Further analysis is also being undertaken on new strategy directions and associated evidence base.</p>		

<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.
<b>Name of Proposal or Policy:</b>  <b>Policy EC5: City, Town, District and Local Centres</b>	<b>Describe the policy under assessment and what change would result if implemented?</b>  This policy sets out the approach to ensuring that the vitality and viability of the network and hierarchy of centres in maintained and that the appropriate level of retail and leisure developments are directed to the most suitable locations. It sets out specific requirements for retail needs for the different levels of the retail hierarchy. It also sets out floorspace thresholds for when an impact assessment will be required for edge or out of centre developments. The Council will need to consider whether there has been any strategic changes in the capacity for new retail development. In addition it will also need to review the centres in the retail hierarchy to determine whether any of the centres need reassigning. The study will also look at the floorspace thresholds for when an impact assessment is required.
<b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b>  <b>(1) eliminate unlawful discrimination, harassment and victimisation;</b>  <b>(2) advance equality of opportunity between different groups; and</b>  <b>(3) foster good relations between different groups</b>	<b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b>  Local shops and leisure facilities can play a positive role in supporting healthy, safe and sustainable communities. It is too early in the production of local plan evidence to indicate the extent of any change and impact.
	<b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b>  Will be subject to further analysis.
	<b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b>  The level of change from the adopted policy position has not

	been determined at this stage.		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<p><b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b></p>	<p>Consultation with Economic Development and Leisure Services is scheduled.</p>		
<p><b>What evidence do you hold to back up this assessment? Do you need further evidence?</b></p>	<p>New evidence work is being commissioned on retail and leisure need and supply.</p>		
<b>Consultation feedback</b>	<p>Public consultation and stakeholder engagement scheduled.</p>		



<p><b>Name of Proposal or Policy:</b></p> <p><b>Policy SC7: Green Belt</b></p>	<p><b>Describe the policy under assessment and what change would result if implemented?</b></p> <p>Policy SC7 sets out the valuable role the Green Belt plays in supporting urban renaissance and transformation as well as keeping settlements separate and conserving the countryside. The policy also establishes the exceptional circumstances which allow for land to be released from the Green Belt in order to deliver the longer term housing and jobs growth in the District.</p> <p>The NPPF emphasises that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.</p> <p>The updated evidence will be used to identify whether there continue to be exceptional circumstances for the release of Green Belt land and if so the extent of Green Belt changes that are required to facilitate growth.</p>
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>There is a relationship between the options for the additional intensification of use of brownfield land and implications for the levels of greenfield and Green Belt which may still be required. It is too early in the production of local plan evidence to indicate the extent of any change and impact.</p> <p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p> <p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p> <p>The level of change from the adopted policy position has not</p>

	been determined at this stage.		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<p><b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b></p>	<p>Consultation included engagement with landscape services, public health and housing.</p>		
<p><b>What evidence do you hold to back up this assessment? Do you need further evidence?</b></p>	<p>Work is progressing on a Green Belt Selective Review and further analysis is being undertaken on housing need and options to intensify development on brownfield sites.</p>		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		

<p><b>Name of Proposal or Policy:</b></p> <p><b>Policy ID2: Viability</b></p>	<p><b>Describe the policy under assessment and what change would result if implemented?</b></p> <p>Part A of Policy ID2 details that where a variation to planning policy requirements or planning obligations is sought due to financial viability, a viability assessment must be submitted to the Council. Part B of the policy indicates that where a development is economically unviable consideration will be given to individual scheme viability in the determination of planning applications.</p> <p>Further work is required on updating viability evidence linked to policies and sites across the District and closely aligned to any review / updates to the adopted Community Infrastructure Levy with its associated evidence base.</p> <p>The process and approach to undertaking viability assessments for plan-making is set out in detail in the NPPG. Any viability assessment should follow the government's recommended approach to assessing viability as set out in this National Planning Guidance and be proportionate, simple, transparent and publicly available. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.</p>
<p><b>The Equality Act 2010 requires public bodies to have “due regard” to the need to:-</b></p> <p><b>(1) eliminate unlawful discrimination, harassment and victimisation;</b></p> <p><b>(2) advance equality of opportunity between different groups; and</b></p> <p><b>(3) foster good relations between different groups</b></p>	<p><b>Will this proposal advance <u>equality of opportunity</u> for people who share a protected characteristic and/or <u>foster good relations</u> between people who share a protected characteristic and those that do not? If yes, please explain further.</b></p> <p>The implications and outcomes from viability assessments are important to local communities, and they often indicate the levels of growth which can be accommodated economically together with any supporting services / facilities and mitigation to support sustainable development. . It is too early in the production of local plan evidence to indicate the extent of any change and impact.</p> <p><b>Will this proposal have a positive impact and help to <u>eliminate discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.</b></p> <p>Will be subject to further analysis.</p> <p><b>Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.</b></p>

	The level of change from the adopted policy position has not been determined at this stage.		
	<p><b>Please indicate (below) the level of negative impact on each of the protected characteristics? Please indicate high (H) medium (M), low (L), no effect (N), Unknown (U) for each.</b></p>	<p><b>How could the disproportionate negative impacts be mitigated or eliminated?</b></p> <p>Unknown at this stage.</p>	
<b>Protected Characteristics</b>			
<b>Age</b>	U		
<b>Disability</b>	U		
<b>Gender Reassignment</b>	N		
<b>Race</b>	U		
<b>Religion / Belief</b>	N		
<b>Pregnancy and Maternity</b>	N		
<b>Sex</b>	U		
<b>Sexual Orientation</b>	N		
<b>Marriage and Civil Partnership</b>	N		
<b>Additional Consideration</b>			
<b>Low income /low wage</b>	U		
<p><b>Please consider which other services would need to know about your proposal and the impacts you have identified. Identify below which services you have consulted, and any consequent additional equality impacts that have been identified.</b></p>	Discussions will progress in conjunction with development management.		
<p><b>What evidence do you hold to back up this assessment? Do you need further evidence?</b></p>	Further work will be commissioned on viability and implications for site development across the District.		
<b>Consultation feedback</b>	Public consultation and stakeholder engagement scheduled.		

## 7. Core Strategy DPD Partial Review and Equalities Impact Assessment.

- 7.1 The Introduction to this report sets out the reasons behind the Partial Review of the Core Strategy DPD and the timescales for this are contained in the Local Development Scheme<sup>3</sup>, approved in July 2018.
- 7.2 The Partial Review will potentially address the following issues and policies:
- Duration of the Plan
  - Housing Requirement, Distribution and Phasing (Policies HO1, HO3 & HO4)
  - PDL, Housing Mix & Housing Quality (Policies HO6, HO8 & HO9)
  - Affordable Housing and Gypsies and Travellers (Policy HO11 & HO12)
  - Employment Growth (Policy EC1)
  - Employment Land Requirement & Distribution (Policies EC2 & EC3)
  - Retail and Leisure (EC5)
  - Green Belt (Policy SC7)
  - Viability (Policy ID2)
- 7.3 At this stage in the preparation of the review, the council has not set out any detailed policy options. Table 6.1 (above) sets out an early stage headline assessment of the considered scope of the core strategy review and equality related issues. Four underlying questions need to be answered to determine whether or not policy changes will have an impact on equalities:
- Q1. Does the policy area have an equal effect on everyone?
- Q2. Does the policy advance equality of opportunity or improve relations?
- Q3. Does the advance opportunity or improved relations involve a lot of change and/or to a large group of people, particularly vulnerable people?
- Q4. Does the policy have disproportionate impacts?
- 7.4 The EqIA table (table 6.1) will be reviewed and updated as the work programme progresses for the partial review.
- 7.5 The overall format of the EqIA will need to be extended to consider the implications of the Site Allocation DPD.

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<sup>3</sup> City of Bradford MDC – (Revised) Local Development Scheme – July 2018

## 8. Next Steps

8.1 Key next steps involve:

- Widening engagement in the development of the EqIA working group.
- Further review of best practice in production of EqIA documents.
- A focused collection of secondary baseline data.
- Integrated findings from commissioned evidence work.
- Review of representations made as part of this stage of consultation.

**The wording in this publication can be made available in other formats such as large print. Please call 01274 433679.**



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