

Equalities Impact Assessment

City Centre Priority Streets Local Development Order – Equalities Impact Assessment

1. The City of Bradford Metropolitan District Council is preparing a Local Development Order (LDO) for the area covered by the Growth Zone Priority Streets area of the city centre. The LDO will work alongside the Priority Streets scheme which seeks to stimulate investments and private sector growth through a range of incentives for new or existing businesses.
2. The LDO will allow the change of use any building or part of buildings within the defined area to uses within classes A1, A2, A3, A4 and AA of the Use Class Order 1987 (as amended).
3. The LDO will not grant consent for physical alterations to buildings and planning permission, advertisement consent and listed building consent would still be required wherever necessary. Building regulations approval would also be required wherever necessary.
4. The LDO will be subject to an Equalities Impact Assessment (EqIA) at all stages of production. The EqIA will be reviewed and re-published following the end of the consultation period and considered in the production of each stage.
5. This EqIA has been produced alongside the draft LDO to assess the potential adverse impacts of the document on various equality groups. The assessment process will be on-going throughout all stages of production of the LDO. This will also include monitoring and reviewing the impacts of the LDO and where necessary seeking to mitigate against any unexpected adverse effects.
6. This document will set out how the needs of equality groups have been taken into account during the preparation and development of the draft LDO. Its purpose is to thoroughly and systematically assess the likely implications of the proposed LDO on various equality groups once it is adopted. This enables the Local Planning Authority to identify direct and non-direct discrimination against equality groups and explore options for mitigating such impacts and improving the document.
7. This draft EqIA will sit alongside the Draft LDO for public comment. Representations received at this stage will be taken into account and where appropriate or necessary, changes may be made to the draft LDO to ensure that all equality groups positively benefit from them.

Equality Impact Assessments

8. The City of Bradford Metropolitan District Council is fully committed to ensuring that everyone has an equal opportunity to play an active and positive role in considering the planning issues which affect them and the District as a whole.
9. The production of an Equality Impact Assessment (EqIA) is a proactive approach to ensuring it meets its general duty under the Equality Act 2010 to have due regard to the need to:
 - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - Advance equality of opportunity between persons who share a relevant protected characteristics and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected and persons who do not share it.
10. These general duties are supplemented by specific duties to be undertaken by the Council as part of the Council Plan 2016-2020 and the Equality Objectives for 2016-2020. Equality forms one of the four principles by which Bradford Council works and the effective use of Equality Impact Assessments is an important tool by which the Council can analyse and understand the likely impact of its decisions in terms of equality and inclusion.

Extent of the Equality Impact Assessment

11. It is the responsibility of the Council to ensure that the organisation does not discriminate in the way it provides services and employment and that it promotes equality, diversity and positive community relations across the district.
12. This draft EqIA ensures that equality issues are addressed from all angles in the preparation and development of the LDO. This report highlights the equality and diversity considerations which have been considered in the creation of the draft LDO This supports the assessment process and could potentially pre-empt any adverse impacts on equality groups which may result from the content of policies within the draft LDO. It will also enable Bradford Council to review the document and consider alternative ways of achieving the same ends.
13. For the purpose of this assessment, the following equality groups have been identified:
 - Age
 - Disability
 - Gender
 - Religion & Belief
 - Race
 - Sexual Orientation
 - Gender Reassignment
 - Pregnancy and Maternity
14. This report explores and recommends actions that, if adopted, will help Bradford Council to anticipate and address any negative consequences which may arise and identify opportunities for the on-going promotion of equality within the District.

Overview of the Equality Impact Assessment Process

15. In undertaking the EqIA, the Council has followed guidance from the Improvement and Development Agency (I&DeA) for Local Government. The Council's Equality and Diversity Team has also produced corporate guidance, which includes the pro-forms completed in sections 3 and 4. The EqIA methodology consists of the following six key stages as outlined in Table 1 below:

Table 1: Six Stages of an Equality Impact Assessment		
Stage	Process	Description
1	Initial Screening	This stage determines whether a full EqIA should be undertaken through the completion of a series of questions. 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	Scoping and Defining	This stage defines the scope of the assessment which will take place. It requires an understanding of what the activity is looking to achieve. A series of questions about the work will be answered at this stage.
3	Information Gathering	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	Making a Judgement	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	Action Planning	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	Publication and Review	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.

16. This report completes Stages 1, 2, 3, 4 and 5 of the process as outlined above. However, it should be noted that this report is not final and that it will be amended to reflect the comments of consultees, including equality groups, if necessary. Once it is finalised the EqIA of the LDO will be reviewed and updated on a regular basis to identify any unexpected impacts.

Initial Equality Impact Assessment for LDO

17. The proposed LDO has been subjected to an initial Equalities Impact Assessment (EqIA). The initial assessment has identified no negative impacts upon the identified characteristics. The results of the initial assessment can be found in Appendix 1 to this report.
18. The initial assessment did, however, highlight a number of likely positive effects the LDO may have on fostering good relations between identified groups and eliminating victimisation.

Shopping and leisure

19. The planned extension of permitted development rights is intended to improve occupancy levels by easing planning restrictions for new and existing businesses. In allowing existing buildings to be developed to form residential units, hotels and offices bring in new people to the area who will in turn create demand for a greater shopping and leisure offer.
20. The introduction of new uses into this area will increase footfall thus contributing towards a reduction in anti-social behaviour and fear of crime. This is considered to aid in eliminating victimisation of protected characteristics, as these groups can often be targeted by criminal activity (during evening / night time hours after trading hours) in areas with little or no activity or footfall in 'empty' streets within the centre.

Protecting and enhancing the natural and built environment of the City Centre

21. The successful take-up of the extended permitted development rights granted by this LDO will see the long term security of the many listed buildings in this area being secured. It will also assist in improving the visual appearance of these areas.

Promoting sustainable transport options

22. The main aim of the LDO is to increase occupancy rates in the City Centre which will assist in drawing people into the Centre. This area currently has a large number of vacant and underused buildings and the introduction of any of the range of uses proposed to be allowed by this LDO would encourage increased activity in this area and generate a greater number of combined trips to the City Centre. It is considered likely that an increase in visitors to the City Centre would also see an increase in use of sustainable transport options such as trains and buses.

Promoting healthy, strong and inclusive communities living in and alongside the City Centre

23. The LDO will assist in the continued regeneration of the City Centre which will encourage residents to come into the Centre to live, shop, work and relax. The enjoyment of the City Centre by all sections of the community is thought to increase the likelihood of residents congregating through recreational activities and this is considered to positively contribute towards the fostering of good relations between different groups.

Achieving sustainable economic growth

24. If the LDO is successful in encouraging development in this key area of the City Centre it is expected to have a positive impact upon poverty and social deprivation by providing job opportunities to those entering the job market for the first time and those currently without employment. It would also provide a number of new homes in a very sustainable location.

Appendix 1 - Initial Equalities Impact Assessment for Little Germany LDO

Department: Regeneration and Culture – Planning, Transportation and Highways Development Management	Completed by (lead): Amin Ibrar	Date of initial assessment: 11 September 2018 Revision Dates:
Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)	City Centre Priority Streets Local Development Order	
Is this existing or new function/policy, procedure, practice or decision?	This is a new policy which will grant planning permission for certain types of changes of uses within parts of the city centre.	
What evidence has been used to inform the assessment and policy? (please list only)		

1. Describe the aims, objectives or purpose of the function/policy, practice, procedure or decision and who is intended to benefit.	The Council is proposing to create this LDO to reduce the high vacancy rates and attract new business to the city centre. The LDO aims to improve occupancy levels by easing planning restrictions for new and existing businesses. It will support the vitality and viability of the city centre by allowing flexible uses of existing and vacant premises in parts of the city centre.		
	The proposed LDO would extend permitted development rights for changes of use of ground floor premises to the following uses:		
	<ul style="list-style-type: none"> • A1: Shops (includes shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, dry cleaners, pet shops, sandwich bars, showrooms, domestic hire shops, funeral directors) • A2: Financial and professional services (includes banks, building societies, estate and employment agencies but will specifically exclude betting shops, pawnbrokers and payday loan shops or similar other uses falling within the A2 use class) • A3: Restaurants and cafes (includes snack bars) • A4: Drinking establishments (includes public houses, wine bars – but not night clubs) • AA: Drinking establishments with extended food offer 		
The Public Sector Equality Duty requires the Council to have “due regard” to the need to:- (1) eliminate unlawful discrimination, harassment and	2. What is the level of impact on each group/protected characteristics in terms of the three aims of the duty? Please indicate high (H) medium (M), low (L), no effect (N) for	3. Identify the risk or positive effect that could result for each of the group/protected characteristics?	4. If there is a disproportionately negative impact what mitigating factors have you considered?

victimisation; (2) advance equality of opportunity between different groups; and (3) foster good relations between different groups (see guidance notes)		each.		
Protected characteristics	Age	N	Positive Impact – See Text in Main Report	N
	Disability	N	As Above.	N
	Gender reassignment	N	As above	N
	Race	N	As above	N
	Religion/Belief	N	As above	N
	Pregnancy and maternity	N	As above	N
	Sexual Orientation	N	As above	N
	Sex	N	As above	N
Any other area	Poverty/Social Deprivation	As Above	N	

5. Has there been any consultation/engagement with the appropriate protected characteristics?		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
6. What action(s) will you take to reduce any disproportionately negative impact, if any? N/A			
7. Based on the information in sections 2 to 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment? (recommended if one or more H under section 2)		YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Assessor signature:	Approved by:	Date approved:	