Bradford Local Plan

Preferred Options



Equality Impact Assessment

February 2021

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About this Document & Consultation

What is this document?	The Equality Impact Assessment (EqIA) is used to assess the impact of the Bradford Local Plan Preferred Option policies and proposals on different groups in the community. The report sets out the parameters which will be used to assess the Plan.
Purpose and scope of the consultation:	This consultation seeks views on the Council's preferred options for its new Local Plan, particularly its strategic policies and preferred site allocations which will guide development and growth in the Bradford District up to 2038. The EqIA is one of the supporting documents that have been published alongside the Local Plan.
Geographical scope:	This consultation applies to Bradford District, however stakeholder views are welcomed from beyond the District.
Other Documents:	A number of other documents/assessments will support the preparation of the Local Plan, including:
	Bradford Local Plan Preferred Options Report: The Local Plan sets out the Council's preferred planning strategy for the Bradford District up until 2038. It combines the strategic policies as previously set out within the Core Strategy Partial Review (CSPR) and the preferred site allocations into one streamlined Local Plan.
	Sustainability Appraisal (SA) (including Strategic Environmental Assessment) (SEA) – Preferred Options Report: The SA has assessed the proposed policies and sites within the plan to determine if it will help to achieve relevant environmental, economic and social objectives.
	Habitats Regulation Assessment (HRA): Draft report based upon updated policies and proposal, including those which have a direct impact on the locational distribution of growth.
	Health Impact Assessment (HIA) – Preferred Options Report: The HIA has assessed the impact of the Local Plan policies and proposals on people's health and wellbeing.
	Core Strategy Partial Review (CSPR) – Preferred Options Report Statement of Consultation: This report provides a record of the consultation that was undertaken in July 2019 along with a summary of the responses gained along with the Council's response.
	Allocations Development Plan Document – Issues and Options Statement of Consultation (May 2019): This report provides a record of the consultation that was undertaken in May 2016 along with a summary of the responses gained along with the Council's response.
Timescale of consultation:	This consultation will begin on Monday 8th February 2021 for 6 weeks ending at 5pm on Wednesday 24th March 2021 .
Availability of documents	Due to the current restrictions arising from the Covid-19 pandemic, the Council has published an Interim Statement of Consultation (SCI)

	January 2021 which sets out the temporary changes to consultation procedures. This is available at https://www.bradford.gov.uk/planning-and-building-control/planning-policy/statement-of-community-involvement/ During the period that the Covid-19 restrictions are in place, the Council consultation activity will be online with all consultation material being made available on the Council's consultation portal – OpusConsult and on the Council's website. The provision of paper copies may not be available and is discouraged,
	although exceptions will be considered on a case by case basis
How to respond	Comments on the Local Plan should be made on the dedicated Local Plan consultation portal - https://bradford.oc2.uk/
	Alternatively, the Council will accept comments via the following methods:
	 By filling in a response form (available on the website) and sending it back to us either by E-mail to: <u>planning.policy@bradford.gov.uk</u>
	 Alternatively, you can post the form back to: Local Plan Team, 4th Floor, Britannia House, Bradford, BD1 1HX
Enquiries	If you have any enquiries regarding this consultation, please contact the Local Plans Team.
	Email: planning.policy@bradford.gov.uk
	Phone : 01274 433679
Confidentiality	Data Protection Act 2018
and data protection	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.
	Local Plans Privacy Statement
	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: https://www.bradford.gov.uk/privacy-notice/

1. Introduction

- 1.1 The City of Bradford Metropolitan District Council (the Council), is preparing a review of its Local Plan. The existing Local Plan consists of the Core Strategy DPD (2017) that contains the strategic planning policies providing the framework for future development and changes to the District up to 2030. It is supported by a number of other documents including two Area Action Plans (for Bradford City Centre and Shipley and Canal Road Corridor) and a Waste Management DPD (all adopted in 2017). The saved policies of the Bradford Replacement Unitary Development Plan (RUDP) adopted in May 2005 also forms part of the current plan.
- 1.2 This document has been prepared to accompany the Preferred Options stage of the Bradford Local Plan. The Council is reviewing its existing Core Strategy DPD (2017) due to changes to national planning policy and local circumstances. The review is necessary to ensure that the district's strategic planning policies remain up-to-date and effective and that appropriate site allocations are identified to deliver the Plan's development requirements.
- 1.3 The Council is committed to providing an equal service for the whole community of the District and use the process of Equality Impact Assessments (EqIA's) to ensure this happens.
- 1.4 The EqIA will be updated as the plan-making process moves forward. It will sit alongside other key documents that support the Local Plan 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.

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 impacts of the Local Plan 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)¹.
- 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 1492)

- 3.3 In order to fulfil the equalities duty, the 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.

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.

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.

Core Strategy Publication Draft (2014) EIA <u>108 Pages</u> and Addendum Report to the Core Strategy Publication Draft (2014) EIA <u>155 Pages</u>

4.2 Bradford Council's Equality and Diversity Statement sets out the authority's commitment to equality and is set out 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 In 2016, the Council committed to a series of 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 it feels are most important to progressing our equalities approach. 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
- 4.4 The Council publishes progress on these objectives on an annual basis through Corporate Overview and Scrutiny Committee reports.
- 4.5 The Council's Plan (2021 to 2025) recognises the importance of equalities as one of the cross-cutting principles that will underpin the work the Council, and achieving its priority outcomes.
- 4.6 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.
- 4.7 An equality assessment should always be proportionate to the change in question and to the potential equality impact of the changes.
- 4.8 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

In line with other assessments, such as the Health Impact Assessment, there are particular key stages in the EqIA process (see Table 5.1). This six-stage figure reproduces the process undertaken previously as part of the development of the adopted Core Strategy, 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	Initial Screening	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	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 and who will be involved in the assessment process.
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.

5.2 In line with the Health Impact Assessment, which also accompanies this stage of consultation on the Local Plan, there is an intention that the EqIA, will be developed as a working document over the course of developing the Local Plan.

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.
- The suggested scope of the Local Plan 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 Local Plan.

Stage 2: Scoping and Defining

5.5 An initial scoping paper was developed by officers within the Local Plan team including a lead officer on equalities and community engagement, as part of the early stages of the Core Strategy Partial Review. In a similar vein to the original Core Strategy Equality Impact Assessment, it was considered beneficial for the inclusion of a wide range of different perspectives and experiences to be used in undertaking the EqIA. It is intended to develop a small focused working group to facilitate this process and support the EqIA work programme as the Local Plan progresses.

Stage 3: Information Gathering

- 5.6 The information sources required to inform the EqIA 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
- 5.7 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.

Stage 4: Making a Judgement

The Equality Impact Assessment will provide an overall judgement of the impact that the Local Plan will have upon the residents of 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.

Stage 5: Action Planning

5.9 The outcomes from the Local Plan 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.

Stage 6: Publication and Review

5.10 The Local Plan 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. Screening Stage Findings

- 6.1 An Equalities Impact Assessment: Scoping Report was published alongside the Core Strategy Partial Review document (January/February 2019). A number of responses were received which focussed on:
 - The need to conduct an Equalities Impact Assessment
 - The need to ensure that planning policies do not discriminate those with disabilities.
 - The need to ensure the continued provision of affordable housing in the
 District to meet the housing needs of all sections of the community, including
 younger people looking to access the housing market as well as older people
 and those with mobility and health concerns who may require appropriate
 housing.
 - The need to examine provision for those with impaired mobility as well as wider service provision across the area.
 - The need to identify and protect areas of recreational value to different sections of the community and ensure that future development does not damage such areas; and
 - Inclusion of Equalities Impact Assessment as part of the planning decision making process.
- As part of the consultation on the Core Strategy Partial Review: Preferred Options (July to September 2019), an updated Equalities Impact Assessment was published as a supporting document. However, no relevant comments were on the assessment and its contents.
- 6.3 This version of the Equalities Impact Assessment will be published alongside the Local Plan: Preferred Options document to allow local people and key

- stakeholder to have their say on its contents. Engagement will also continue with a range of internal council services and departments who have key role to play in shaping the Local Plan.
- 6.4 Following consultation, the Local Plan document, together with supporting documentation such as the Equalities Impact Assessment will be reviewed and updated as required. A publication (submission) draft version of the Local Plan will be drawn up and published for formal community and stakeholder consultation before it is submitted to the Secretary of State for independent examination.

7. Information Gathering

7.1 This section provides a broad statistical and key issue profile of the District and its residents in terms of the relevant protected characteristics as detailed under the Equalities Act 2010 and the Council's additional considerations.

Age

- 7.2 Bradford has a population of 539,800 people, and is the fifth largest local authority in England in terms of population (after Birmingham, Leeds, Sheffield and Manchester)³. It is also one of the youngest populations in the country. More than one-quarter of the District's population is aged less than 20, and nearly seven in ten people are aged less than 50. Bradford has the third highest percentage of the under 16 population after the London Borough of Barking and Dagenham, Slough Borough Council and Luton Borough Council⁴.
- 7.3 The district's population is expected to grow to 560,133 by the end of the Local Plan period in 2038, an increase of 3.8%. Older age groups are projected to have the largest percentage increases in terms of numbers. By 2028, the 65+ age group is projected to increase by 19.1% and the 85+ age group is projected to increase by 43.8% and the 85+ age group is projected to increase by 75.9%⁵.
- 7.4 Those aged under 18 formed 27.8% of the total population in 2018 but is projected to decrease by 1.4% by 2026 and by 2.7% by 2043. Although Bradford had the third largest under-18 population in the country in 2018, it is projected to remain the same in 2028 and 2043. The working age population shows an increase of 1.5% by 2028 and 0.6% by 2043. This does not take account of the future increases in the state pension age. This rose to 66 for men and women in

Bradford District Population Update – Intelligence Bulletin, CBMDC (July 2020) based on Mid-Year Population Estimates 2019 (ONS, June 2020)

Bradford District Population Update – Intelligence Bulletin, CBMDC (July 2020) based on Mid-Year Population Estimates 2019 (ONS, June 2020)

⁵ <u>2020 Population Projections – Intelligence Bulletin, CBMDC (March 2020)</u> (based on Population Projections 2020 (ONS, March 2020)

- October 2020. Government is planning further increases which will raise the State Pension age from 66 to 67 between 2026 and 2028⁶.
- 7.5 The 5 to 9 and 30 to 49 age groups are projected to show a marked decrease by 2043, -8.4% and -8.3% respectively⁷.

Disabilities

- 7.6 The Equality Act states that a person has a disability if he or she 'has a physical or mental impairment' which has 'a substantial and long-term adverse effect on his or her] ability to carry out normal day-to-day activities'.
- 7.7 According to the 2011 Census, 17.3% of Bradford's population (90,527 people) suffers from a long-term health problem or disability which impacts upon their everyday activities. This is slightly lower than the West Yorkshire (18%) and, Yorkshire and Humber (19.3%) levels but is similar to England, where 17.6% of the population lives with a long-term health problem or disability⁸.

Table 7.1: Long Term Health Problems or Disability in Bradford District (2011)

	Brad	lford	Yorkshire & Humber	England
	Number	%	%	%
Limited a Lot	43,975	8.4%	9.1%	8.3%
Limited a little	46,552	8.9%	9.8%	9.3%
Not Limited	431,925	82.7%	81.2%	82.4%

Source: ONS Census 2011 - Table QS303EW

Gender

7.8 At present, there is no reliable local data on gender reassignment. The Office for National Statistics recognises that there is a lack of information on transgender people and has consulted on possible questions to be included in the 2021 Census.

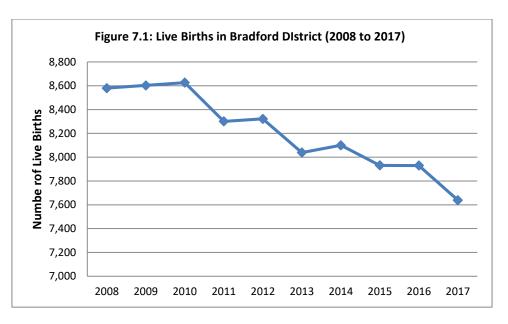
Pregnancy and Maternity

7.9 In 2017 there were 7,639 live births in Bradford District. The number of live births has been generally falling over the past few years, with the total number of live births in 2017 being the lowest in recent years, which is in line with the national trend.

^{6 2020} Population Projections – Intelligence Bulletin, CBMDC (March 2020) (based on Population Projections 2020 (ONS, March 2020)

⁷ 2020 Population Projections – Intelligence Bulletin, CBMDC (March 2020) (based on Population Projections 2020 (ONS, March 2020)

ONS Census 2011 - Long Term Health Problems or Disability (QS303EW) taken from <u>UK Census Data website</u>



Source: ONS (in Joint Strategic Needs Assessment)

- 7.10 Fertility rates are closely linked to population growth rates for an area and can be a useful indicator as to future population changes. The General Fertility Rate (GFR) is the number of live births per 1,000 females aged 15-44 years. Although Bradford has one of the highest GFRs in the country, due in part to its younger population, which impacts a variety of different services including school, maternity, and children and young people's services, its rate has been falling over recent years at a faster rate than that for England.
- 7.11 GFR varies across the district, with higher rates seen in wards with a generally younger population including Manningham, Bowling and Barkerend and Keighley Central and lower rates seen in wards with an older population including Ilkley, Bingley and Bingley Rural. One exception to this is City ward which, due to its student population, has a low GFR but a higher proportion of younger people⁹.

Race

7.12 Bradford District is an ethnically diverse area, with largest proportion of people of Pakistani ethnic origin in England. One in four living in the District describe themselves as Asian/Asian British ethnic origin, compare to 1 in 10 people living in England as a whole.

Table 7.2: Ethnicity in Bradford District (2011)

Ethnic Group	Number	Percentage	
White	352,317	67.4	
White British	333,628	63.9	
White Irish	2,541	0.5	

Joint Strategic Needs Assessment – The Population of Bradford District – Births & Deaths in Bradford District (January 2019)

Ethnic Group	Number	Percentage
Gypsy or Irish Traveller	433	0.1
Other White	15,715	3.0
Mixed/multiple ethnic groups	12,979	2.5
Asian/Asian British	140,149	26.8%
• Indian	13,555	2.6
Pakistani	106,614	20.4
Bangladeshi	9,863	1.9
Other Asian ethnic group	10,117	1.9
Black/African/Caribbean/Black British	9,267	1.8%
Other ethnic group	7,740	1.5%

Source: ONS Census 2011 - Table QS201EW¹⁰

7.14 Whilst the District itself is ethnically diverse, there is also wide variation across it. Some wards, including Toller, Manningham and Bradford Moor have a population of between 70% and 80% being people of Asian/Asian British ethnic origin. Other wards including Ilkley, Wharfedale and Worth Valley have a population which is predominately of white ethnic origin.

Religion and Faith Groups

- 7.15 When compared to the 2001 Census, the results of the 2011 Census showed an increase in the proportion of people who identified themselves as Muslim and a decrease in the proportion of those who identified themselves as Christian. There has also been an increase in the proportion of people who state that they have no religion. Other religious groups showed smaller changes in their proportions.
- 7.16 When benchmarked against England, West Yorkshire and Yorkshire and Humber comparators, lower proportions of Bradford's population identified themselves as Christian, Buddhist or Jewish than regionally or nationally. Also a lower proportion of the District's population did not state their religion or had no religion than those regionally or nationally. A significantly higher proportion of the District's population identified themselves as Muslims than regionally or nationally. Excluding the inner and outer London boroughs, Bradford has the second highest proportion of Muslims after Blackburn and Darwen (27%).¹¹
- 7.17 Table 7.2 below provides further information on faith and religion extracted from the Census 2011.

¹⁰ Information reproduced from <u>CBMDC Intelligence Bulletin – Ethnicity in Bradford (4th January 2017)</u>

¹¹ Information reproduced from <u>CBMDC Intelligence Bulletin – Religion in Bradford (3rd January 2017)</u>

Table 7.3: Faith & Religion in Bradford District

	Bradford 2001		Bradford 2011		West Yorkshire	Yorkshire & Humber	England
	Number	%	Number	%	%	%	%
No religion	62,226	13.3	108,027	20.7	25.1	25.9	24.7
Christian	281,236	60.1	239,843	45.9	54.6	59.5	59.4
Buddhist	537	0.1	1,000	0.2	0.3	0.3	0.5
Hindu	4,457	1.0	4,882	0.9	0.7	0.5	1.5
Jewish	356	0.1	299	0.1	0.3	0.2	0.5
Muslim	75,188	16.1	129,041	24.7	11.3	6.2	5.0
Sikh	4,478	1.0	5,125	1.0	0.8	0.4	0.8
Any other religion	996	0.2	1,686	0.3	0.3	0.3	0.4
Regional not stated	37,921	8.1	32,549	6.2	6.6	6.8	7.2

Source: ONS Census 2011 - Table KS209EW

Sex

7.9 In 2018, there were a total of 272,433 girls and women living in Bradford District and 264,470 boys and men. As with the national average, the percentage of males and females has stayed roughly the same, with females accounting for 50.7% of the population, compared to 49.3% of the population of Bradford District being male.

Sexual Orientation

7.18 It is difficult to get accurate figures for sexual orientation. Based on national figures, the Bradford Equity Partnership estimates that there are between 33,400 and 47,800 people in the District who identify themselves as LGB. For the first time the 2011 Census collected information on civil partnerships. In the Bradford District there were 3,000 people (0.8%) of the adult population living in a same sex civil partnership or cohabiting. This is just below the average for England of 0.9%.

Marriage and Civil Partnerships

- 7.19 ONS statistics showed that 1,404 marriages took place in Bradford District during 2017. This consisted of 1,379 marriages between opposite sex couples and 24 between same sex couples¹².
- 7.20 According to the 2011 Census, 193,281 people are married in Bradford; this equates to 48.3% of the District's population who are aged 16 and over. The proportion of the population which is married in the District is slightly higher than

ONS - Marriages in England & Wales - Table 14: Marriages by Area of Occurrence (2017)

in England (47%). The Census also reported that 0.2% of the district's population (608 people) are living in a registered same-sex civil partnership, the same as in England¹³.

Table 7.4: Martial Status & Civil Partnership Status (All Usual Residents Aged 16 & Over) (2011)

Marital & Civil Partnership Status	Bradford		Yorkshire & Humber	England
	Number	%	%	%
Married	193,281	48.3%	46.8%	46.6%
In a Registered Same-Sex Civil Partnership	608	0.2%	0.2%	0.2%
Single*	132,036	33%	33.9%	34.6%
Separated**	12,907	3.2%	2.6%	2.7%
Divorced/Civil Partnership Legally Dissolved	34,323	8.6%	9.3%	9.0%
Widowed/Surviving Partner from Same Sex Civil Partnership	26,966	6.7%	7.2%	6.9%

^{*} Single (never married or never registered a same-sex civil partnership)

Source: ONS Census 2011 - Marital & Civil Partnership Status (KS103EW)

Low Income and Low Wages

- 7.21 Low skills are reflected in lower than average earnings. Median weekly full-time earnings for Bradford residents are £451.60, below the regional average of £480.50 and the UK average of £529.60. However, this gap is narrowing. Since 2010 median earnings have increased by 5.8% which is more than a regional increase of 3.9% and national growth of 3.6%.
- 7.22 Wage levels reflect the occupation profile of Bradford's residents. Bradford has more people than average employed in the lower paid elementary occupations and fewer managers and directors than average. Elementary occupations account for 13.3% of Bradford's employed residents.

8. Equalities Impact Assessment – Local Plan

8.1 This section includes a review of the policy areas that are being covered part of the Preferred Options stage of consultation. These policy areas have extended beyond the extent of the key policies identified as part of previous consultations on the Core Strategy Partial Review, and takes into consideration additional

^{**} Separated (but still legally married or still legally in a same-sex civil partnership)

ONS Census 2011 - Marital & Civil Partnership Status (KS103EW) (All usual residents aged 16 and over) taken from UK Census Data website

issues raised during the previous consultations and updates to the evidence base.

- 8.2 In general terms, the Local Plan covers the following policy areas:
 - The Local Plan Period national policy indicates that the plan should look ahead over a 15-year period. The current Core Strategy (2017) plan runs until 2030. It is proposed that the new Local Plan period should be set at 2020 to 2038.
 - Strategic Policies (SP1 to SP16) these policies provide the overall context for the Local Plan including setting the development strategy, levels and distribution of growth, approach to addressing climate change, and supporting healthy places and communities;
 - Thematic Policies: Planning for Prosperity (Policies EC1 to EC4 and TR1 to TR8) These policies set out the approach to delivering economic growth as well as transport planning. This includes a strategy for employment land and sites provision as well as supporting existing employment zones and improved local skills/training. It also addresses the role of town centres, retail and leisure.
 - In relation to transport planning, these policies identify key projects and schemes to improve the district's network as well as the relationship between transport and the environment and development and tourism. Other policies are including on parking, freight and aircraft safety.
 - Thematic Policies: Planning for Homes (Policies HO1 to HO11) These
 policies set out how the district's overall housing requirement as set out in
 policy SP8, will be delivered.
 - This includes the provision of affordable and specialist housing, ensuring an appropriate mix of housing types and tenures and addressing Gypsy, Travellers and Travelling Showpeople accommodation needs. They also set out standards for new housing provision and an approach to dealing with overcrowded and empty homes.
 - Thematic Policies: Planning for Places & Communities (Policies EN1 to EN21, CO1 to CO3 and DS1 to DS5) - These policies set out how the district's natural and built environment and landscapes will be protected and enhanced, including the provision of open space and green infrastructure, and managing flood risk.
 - They also provide a framework for improving air quality, protecting public health and renewable/low carbon energy, as well as managing the impacts of minerals and waste development. It also sets out how community facilities will be protected and enhanced, assessing the impact of development on health and wellbeing. A number of policies provide a framework for high quality design.
 - Local Areas & Allocations These are a series of profiles of each of the district's settlements and communities based on the Local Plan evidence base.
 They include a series of local area strategies or spatial visions for the future

- direction of plan-making at the local level. The local area strategies include the location of site allocations for housing and employment uses, which are then further detailed as a series of supporting tables and site pro-formas.
- Implementation & Delivery (Policies ID1 to ID3) These policies set out
 how the Council intends to ensure infrastructure is delivered to support the
 wider spatial strategy and growth established in the strategic policies of the
 Plan. They also seek to ensure that development contributes towards its
 provision, where required, together with how developer contributions to fund
 infrastructure will be secured.

9. Local Plan and Equalities Impact Assessment

- 9.1 The Introduction to this report sets out the reasons behind the development of the Local Plan. The timescales for this are contained in the Local Development Scheme¹⁴, approved in July 2018.
- 9.2 This Preferred Options stage of the preparation of the Local Plan sets out a series of detailed policies and proposals. This document provides an assessment of these policies and proposals and equality related issues. Four underlying questions need to be answered to determine whether or not these policies 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?
- 9.3 The EqIA form (see Appendix 1: Equality Impact Assessment Form) will be reviewed and updated as the Local Plan moves through its remaining stages.

10. Next Steps

- 10.1 The Preferred Options forms part the early (pre-submission) stages in updating the Bradford Local Plan. It seeks to ensure that it is consistent with recent changes to national policy and reflects changes in local circumstances. As the Plan develops and updated policies are brought forward, there will be a need to continually assess the equality impacts that may arise.
- 10.2 The Plan's strategic policies will set the context for the sites allocations for housing, employment, leisure, infrastructure and other uses are located as well as more detailed thematic policies to deliver the strategy and manage development. The formation of updated local planning policy will be widely consulted upon,

¹⁴ City of Bradford MDC – (Revised) Local Development Scheme – July 2018

including dialogue with various representatives from across the protected characteristics groups as described in paragraph 3.3 above.

10.3 Key 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.
- 10.4 This EqIA will be published alongside the Local Plan Preferred Options document as part of the community and stakeholder engagement process and the Council will be inviting comments from a wide range of stakeholders. Any additional equality related issues identified through the consultation responses will be considered as part of plan-making process.
- 10.5 This EqIA together with consultation responses and any new evidence will be considered as part of the preparation of the Submission Draft version of the Local Plan.



Equality Impact Assessment Form

Reference -

Department	Place	Version no	1
Assessed by	Iain Cunningham	Date created	20.01.2021
Approved by	Stephen Hay	Date approved	
Updated by	Iain Cunningham	Date updated	
Final approval	Stephen Hay	Date signed off	

The Equality Act 2010 requires the Council to have due regard to the need to

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups

Section 1: What is being assessed?

1.1 Name of proposal to be assessed.

Bradford Local Plan (2020 to 2038): Preferred Options (February 2021)

1.2 Describe the proposal under assessment and what change it would result in if implemented.

Legislation requires Local Planning Authorities (LPAs) to put in place a statutory development plan to guide and manage future growth and development in their areas over 15-year time horizon. They are the starting point against which decisions on planning applications are made.

Bradford's current Local Plan consists of a number of adopted documents – the Core Strategy DPD (July 2017), Bradford City Centre Area Action Plan (October 2017), Shipley and Canal Road Area Action Plan (October 2017) and Waste Management DPD (November 2017) as well as the saved policies of the Bradford Replacement Unitary Development Plan (May 2005).

Following changes to national planning policy and changes in local circumstances. It is considered that a review of the Local Plan is necessary to ensure that the strategic policies remain up-to-date and effective and that appropriate site allocations are identified to deliver the Plan's development requirements.

The adopted Core Strategy plan period runs from 2013 (the base date) and covers the 17-year period to 2030. Paragraph 22 of the National Planning Policy Framework (2019) indicates that strategic policies should look ahead over a minimum 15-year period from adoption. It was initially proposed to extend the plan period to 2035 and then 2037 as part of the Core Strategy Partial Review.

To comply with this requirement, the Local Plan will need to establish a new plan period. It is intended to reset the plan period from 2020 to 2038. This allows for an 18-year plan length and a forward view of strategic policies of 15 years from the anticipated adoption date in 2023. Extending the period allows for uncertainties in plan period and ensures that it looks ahead over a minimum 15 years from adoption.

The Bradford Local Plan 2020 to 2038 will be the statutory development plan for Bradford District and its communities (when adopted). It will have a material effect on the amount and type of development that will take place in the district over its lifetime together with the its location and nature. This will include the level and type of housing growth (including the provision of affordable housing), the number and type of jobs, and the protection and enhancement of the natural and built environment, as well as the provision of new or enhanced infrastructure to support growth.

The scope of the Local Plan and its 18-year time span means that it will have significant impact on the lives of those who live, work and visit Bradford district. It sets out vision that provides the framework for the development of the policies within the Local Plan as well as a number of strategic objectives that indicate how the vision will be delivered. The key policy directions in the plan include:

- Balancing growth while protecting our local assets
- Investing in regeneration opportunities
- A greener and healthy place
- Supporting jobs, training and skills development
- Driving high quality housing and place-making

The plan consists of a mix of strategic and thematic policies. The former provides the context for the latter.

Policy Group	Summary
Strategic Policies: Development Strategy (Policies SP1 to SP5); Planning for Prosperity (Policies SP6 & SP7); Planning for Homes (Policy SP8); and Planning for Places and Communities (Policies SP9 to SP16)	Strategic policies provide the overall context for the Local Plan including setting the development strategy, levels and distribution of growth, approach to addressing climate change, supporting healthy places and communities
Thematic Policies - Planning for Prosperity: Economy (Policies EC1 to EC4); and Transport & Movement (Policies TR1 to TR7)	These policies set out the approach to delivering economic growth as well as transport planning. This includes a strategy for employment land and sites provision as well as supporting existing employment zones and improved local skills/training. It also addresses the role of town centres, retail and leisure.

Policy Group	Summary
	In relation to transport planning, these policies identify key projects and schemes to improve the district's network as well as the relationship between transport and the environment and development and tourism. Other policies are including on parking, freight and aircraft safety.
Thematic Policies - Planning for Homes (Policies HO1 to HO11)	These policies set out how the district's overall housing requirement as set out in policy SP8, will be delivered. This includes the provision of affordable and specialist housing, ensuring an appropriate mix of housing types and tenures and addressing Gypsy, Travellers and Travelling Showpeople accommodation needs. They also set out standards for new housing provision and an approach to dealing with overcrowded and empty homes.
Thematic Policies - Planning for Places & Communities: Environment (Policies EN1 to EN10); Minerals & Waste (Policies EN11 to EN21); Community Facilities (CO1 to CO3); and Design (Policies DS1 to DS5)	These policies set out how the district's natural and built environment and landscapes will be protected and enhanced, including the provision of open space and green infrastructure, and managing flood risk. They also provide a framework for improving air quality, protecting public health and renewable/low carbon energy, as well as managing the impacts of minerals and waste development. It also sets out how community facilities will be protected and enhanced, assessing the impact of development on health and wellbeing. A number of policies provide a framework for high quality design.
Local Areas & Site Allocations	These are a series of profiles of each of the district's settlements and communities based on the Local Plan evidence base. They include a series of local area strategies or spatial visions for the future direction of plan-making at the local level. The local area strategies include the location of site allocations for housing and employment uses, which are then further detailed as a series of supporting tables and site pro-formas.
Implementation, Delivery & Monitoring (Policies ID1 to ID3)	These policies set out how the Council intends to ensure infrastructure is

Policy Group	Summary
	delivered to support the wider spatial strategy and growth established in the strategic policies of the Plan. They also seek to ensure that development contributes towards its provision, where required, together with how developer contributions to fund infrastructure will be secured.

Section 2: What the impact of the proposal is likely to be

2.1 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.

Overall, the Local Plan should have mainly positive impacts for all sections of the community in Bradford district, including those who share a protected characteristic. It seeks to deliver sustainable development and meet the various housing requirements (including the provision of affordable and specialist housing) and employment needs of local people, as well as ensuring that they are able to live in a high quality natural and built environment with good access to key services, facilities and infrastructure that support everyday living. The policies also seek to make the most efficient use of the district's resources including land, minerals, water and energy, as well as reducing the impacts of climate change.

This reflects the key drivers of the Local Plan:

- Balancing growth while protecting our local assets;
- Investing in regeneration opportunities;
- A greener and healthy place;
- Supporting jobs, training and skills development; and
- Driving high quality housing and place-making;

Examples of how the plan's policies and proposals will have a positive impact on those who share a protected characteristic are outlined below:

• Strategic Policies – Policy SP5 seeks to concentrate the development to meet in the most sustainable locations. Doing so will help to improve accessibility and support increased travel choice, particularly those who have limited access to a car and rely on other modes. In addition, increased accessibility will allow easier access to the key services and facilities that support sustainable communities.

Policy SP15 should benefit all sections of the community by seeking to reduce health inequalities and supporting opportunities for local residents to live healthier lifestyles. It will also seek to ensure that the health impacts of development on communities are addressed as well as ensure that they sufficient access to health care facilities that are well located and meet their needs (AII).

Planning for Prosperity – Business and job creation can have positive impacts on improving individual life opportunities within communities. Policies EC1 to EC3 seek to support the delivery of economic growth across the district, including the provision of employment land and supporting job creation as well as improved skills. Overall, they can be viewed as have a positive impact on all groups. Supporting employment, skills and training as well as expanded education facilities are considered to bring positive benefits for those who suffer higher levels of unemployment and lack skills, knowledge and opportunities as well as those who wish to access educational opportunities close to where they live.

Policies TR1 to TR5 seek to widen travel choice, including the use of non-car modes such as opportunities for better public transport, cycling and walking provision, and increase accessibility to employment, services and facilities. This should be benefit all sections of the community, particularly those without access to a vehicle.

• Planning for Homes – Policy HO5 supports the delivery of good quality affordable housing to meet identified need across the district. This includes providing a mix of tenures (affordable homes for rent and affordable home ownership products). Providing affordable housing can assist younger generations or those on lower incomes to enter the housing market (Age; Low Income/Low Wage). Policy HO4 seeks to ensure that new housing development includes a mix of homes including different types, sizes, prices and tenures. It also identifies a number of strategic priorities for the type of homes that should be provided. This is aimed at benefitting all sections of the community.

Policy HO7 supports an increase in the provision of specialist housing including accommodation for older people and those with disabilities in suitable locations to meet identified needs (Age; Disability), whilst policy HO9 sets out standards for new housing developments including the provision of accessible dwellings (Disability). Policy HO10 seeks to tackle overcrowded and vacant homes to improve the quality of life for local people (AII).

Planning for Places & Communities – Policy CO1 seeks to protect and enhance
the district's open space network including delivering provision as part of new
development and safeguarding against their loss. The provision of good quality and
publically accessible open spaces provides a range of quality of life benefits for
communities including better health and wellbeing, increased activity and
connections to the natural environment (All)

Policy CO2 supports the provision of new and/or enhanced community facilities and infrastructure (e.g. community centres, places of worship, health care facilities, schools, and sport/leisure facilities) and safeguard against their unnecessary loss (AII). In addition, it seeks to ensure that new facilities are in accessible locations including where they can be served by public transport and non-car modes, and that buildings need to be easily access by all sections of the community (Age; Disability). Policy CO3 introduces the concept of assessing the health impact of new developments (AII)

• Implementation & Delivery – Policies ID1 and ID2 seek to ensure that appropriate infrastructure is delivered at the right time to support the development requirements set out in the Local Plan. In addition, it helps to maintain and create sustainable

communities and better places. This should benefit all sections of the community (AII)

2.2 Will this proposal have a positive impact and help to <u>eliminate</u> <u>discrimination and harassment against, or the victimisation</u> of people who share a protected characteristic? If yes, please explain further.

See above

2.3 Will this proposal potentially have a negative or disproportionate impact on people who share a protected characteristic? If yes, please explain further.

It is not considered that the Local Plan would have a negative or disproportionate impact on any section of Bradford's communities, including those who share a protected characteristic.

2.4 Please indicate the <u>level</u> of negative impact on each of the protected characteristics? (Please indicate high (H), medium (M), low (L), no effect (N) for each)

Protected Characteristics:	Impact (H, M, L, N)
Age	No Effect
Disability	No Effect
Gender reassignment	No Effect
Race	No Effect
Religion/Belief	No Effect
Pregnancy and maternity	No Effect
Sexual Orientation	No Effect
Sex	No Effect
Marriage and civil partnership	No Effect
Additional Consideration:	
Low income/low wage	No Effect

2.5 How could the disproportionate negative impacts be mitigated or eliminated? (Note: Legislation and best practice require mitigations to be considered, but need only be put in place if it is possible.)

The plan is supported by a Sustainability Appraisal, which considers the social, economic and environmental effects of the Local Plan, and ensures that, as far as possible, accords with the principles of sustainable development. As part of the assessment of the policies, it suggests potential mitigation approaches to address likely significant impacts.

Section 3: Dependencies from other proposals

3.1 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.

The Local Plan is expected to reflect the key spatial elements of the plans and strategies of various internal and external partners. To this end, a range of council departments and services have been involved in preparing the Local Plan to date. These have, amongst others, included:

- Economic Development;
- Development Management;
- Housing;
- Highways;
- Asset Management;
- Leisure and Recreation;
- Education; and
- Public Health.

These departments and services, as well as external partners will continue to be involved as the Local Plan and its supporting evidence base is developed.

Section 4: What evidence you have used?

4.1 What evidence do you hold to back up this assessment?

It is a requirement that the Local Plan is underpinned by a robust, relevant and up-todate evidence base. It should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account market signals.

The evidence base supporting the Plan consists of a range of studies and assessments on a range of topics such as housing and employment supply, retail and leisure, open space, Green Belt, viability and infrastructure. These studies and assessments include:

- Strategic Housing Market Assessment;
- Gypsy and Traveller Accommodation Assessment;
- Housing and Economic Land Availability Assessments;
- Green Belt review;

- Retail and Leisure Study;
- Open Space Assessment;
- Local Infrastructure Plan;
- Strategic Flood Risk Assessment; and
- Site Assessment Methodology;

It should be noted that the above list is to illustrate some of the studies/assessments that support the plan and is not exhaustive. In addition, the plan is underpinned by national planning policy/guidance and needs to reflect elements of other key regional, sub-regional and local strategies and plans.

The Local Plan is also informed by the separate Sustainability Appraisal (incorporating Strategic Environmental Assessment), Habitat Regulations Assessment and Health Impact Assessment. In addition, the most up-to-date available demographic information was taken from sources such as the Census data 2011, population estimates (Office for National Statistics), Indices of Multiple Deprivation, and other national, regional, and local sources of data.

The process for producing a Local Plan places great weight on the quality of the evidence supporting policy decisions. The evidence base will be tested through public examination by a Planning Inspector before the Plan can be adopted.

4.2 Do you need further evidence?

As the Local Plan develops the evidence base will be updated and refreshed to take into account consultation and any potential changes in circumstances, as well as any further work that is undertaken. When the final version of the Local Plan (the publication draft) is prepared, the supporting evidence base will also be finalised and published alongside the Plan for formal consultation.

Following this consultation, the Plan together with the evidence base and community/stakeholder representations received will be submitted to the Planning Inspectorate for an independent examination. The Plan will be rigorously tested to ensure that it is legally and procedurally compliant, and meets the four tests of soundness. One of these test is that the Plan should be justified – setting an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Section 5: Consultation Feedback

5.1 Results from any previous consultations prior to the proposal development.

The Local Plan is being developed with the intention to ensure all sectors of the community have the opportunity to have their say in how their community is planned and developed, irrespective of race; disability; age; religion or belief; gender reassignment; pregnancy and maternity; sex and sexual orientation.

Efforts have been made to ensure that the consultation process should be an inclusive one that involves a wide range of community groups, in accordance with the Equalities Act 2010. Details of how the Council intends to engage with communities is set out the Statement of Community Involvement (2018).

The Local Plan is informed by the separate Sustainability Appraisal (incorporating Strategic Environmental Assessment). The Sustainability Appraisal (SA) framework has been in place since the scoping stages of the new Local Plan in early 2019.

Equalities issues have been addressed in a number of ways as part of the SA. SA objectives 11 to 13, 16 and 17 are particularly relevant:

- 11. To provide the opportunity for everyone to live in quality housing which reflects individual needs, preferences and resources;
- 12. To improve the quality and range of services available within communities and connections to wider social, environmental and economic networks;
- 13. To promote social cohesion, encourage participation and improve the quality of life in deprived neighbourhoods;
- 16. To provide the conditions and services to improve physical and mental health and wellbeing and reduce inequality to access to health and social care;
- 17. To promote education and training opportunities which build the skills and capacity of the population

An SA Scoping Report and an initial SA report were published for consultation at previous stages alongside the draft Local Plan (Core Strategy Partial Review).

5.2 The departmental feedback you provided on the previous consultation (as at 5.1).

See section 3.1.

5.3 Feedback from current consultation following the proposal development (e.g. following approval by Executive for budget consultation).

The results of previous consultation exercises on the Core Strategy Partial Review (2019) and Allocation Development Plan Document (2016) have been taken into consideration, where appropriate, in drafting the Local Plan: Preferred Options. Details of the comments received during previous consultation stages, together with the Council's response to them, are set out the Statements of Consultation that form part of the evidence base for the Plan.

Representations received on the Preferred Options version of the Bradford Local Plan will be logged and assessed following the closure of the consultation period. These will be used to inform the contents of the publication (submission) version of the Plan as well as the evidence base supporting it.

5.4 Your departmental response to the feedback on the current consultation (as at 5.3) – include any changes made to the proposal as a result of the feedback.

See section 5.3.

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