

**BRADFORD CITY CENTRE AREA ACTION PLAN:  
PUBLICATION DRAFT**

**INITIAL EQUALITIES IMPACT ASSESSMENT**

**December 2015**

## 1.0 INTRODUCTION

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- 1.1 The City of Bradford Metropolitan District Council is preparing an Area Action Plan (AAP) for Bradford City Centre as part of the Local Plan for the District.
- 1.2 The City Centre Area Action Plan, as the statutory development plan, will set out planning policies to guide development proposals and associated infrastructure in the city centre, along with details of how these proposals will be delivered. It will also be used to determine planning applications in the city centre over the next 15 years.
- 1.3 The production of the Area Action Plan consists of 4 stages:
1. Issues and Options
  2. Publication Draft
  3. Submission Draft
  4. Adoption post examination

The Area Action Plan will be subject to an Equalities Impact Assessment (EqIA) at all stages of production. The EqIA be reviewed and re-published following the end of the consultation period and considered in the production of each stage.

- 1.4 This initial Equalities Impact Assessment (EqIA) has been produced alongside the Publication Draft of the AAP to assess the potential adverse impacts of the document on various equality groups. The assessment process will be ongoing throughout all stages of production of the AAP, from Issues and Options to Adoption. This will also include monitoring and reviewing the impacts of the AAP and where necessary seeking to mitigate against any unexpected adverse effects.
- 1.5 The City Centre Area Action Plan is needed in order to:-

- Deliver proposed growth of the city centre over next 15 years (as established in the Local Plan – Core Strategy) through series of development proposal statements and planning policies.
- An up to date development plan with a catalogue of potential developments sites will provide certainty to investors and developers
- Stimulate regeneration through use of planning tools such as Local Development Orders (LDOs)
- Assist with land assembly through, for example, Compulsory Purchase Orders (CPO) to enable development and critical infrastructure
- Protect and enhance built heritage whilst proactively accommodating new developments
- Ensure developments are of an appropriate scale, mix and design quality

1.6 This document will set out how the needs of equality groups have been taken into account during the preparation and development of the draft Issues and Options report. Its purpose is to thoroughly and systematically assess the likely implications of the proposed AAP 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.

1.7 This initial EqIA sits alongside the Publication Draft for public comment. Representations received at this stage will be taken into account and where appropriate or necessary, changes may be made to the Publication Draft report to ensure that all equality groups positively benefit from the AAP.

1.8 This document will set out how the needs of equality groups have been taken into account during the preparation and development of the Publication Draft report. Its purpose is to thoroughly and systematically assess the likely implications of the proposed AAP 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.

- 1.9 This initial EqlA sits alongside the Publication Draft for public comment. Representations received at this stage will be taken into account and where appropriate or necessary, changes may be made to the Publication Draft report to ensure that all equality groups positively benefit from the AAP.

## 2.0 EQUALITY IMPACT ASSESSMENTS

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- 2.1 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.
- 2.2 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.
- 2.3 These general duties are supplemented by specific duties to be undertaken by the Council in the way of its Equality Objectives for 2012-2016. In particular Objective 2, which aims to Embed Equality through the effective use of Equality Impact Assessments for all relevant procedures, processes and policies.

### **Extent of the Equality Impact Assessment**

- 2.4 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.
- 2.5 This initial EqIA ensures that equality issues are addressed from all angles in the preparation and development of the AAP. This report highlights the equality and diversity considerations which have been discussed via a working group comprised of key officers within the Council. 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 AAP. It will also enable Bradford Council to review the document and consider alternative ways of achieving the same ends.

2.6 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

2.7 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 ongoing promotion of equality within the District.

### **Overview of the Equality Impact Assessment Process**

2.8.1 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-formers 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**

<b>Stage</b>	<b>Process</b>	<b>Description</b>
1	<b>Initial Screening</b>	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	<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. A series of questions about the work will be answered at this stage.
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.

2.9 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 AAP will be reviewed and updated on a regular basis to identify any unexpected impacts.

### **3.0 INITIAL EQUALITY IMPACT ASSESSMENT**

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- 3.1 The Bradford City Centre Area Action Plan (AAP) has been subjected to an initial Equalities Impact Assessment (EqIA) and revised Equalities Impact EqIA. The initial assessment and revised assessment have identified no negative impacts upon the identified characteristics. The results of the revised initial assessment can be found in Appendix 1 to this report.
- 3.2 The initial and revised assessment did, however, highlight a number of likely positive effects the AAP may have on fostering good relations between identified groups and eliminating victimisation.

#### **City Centre Living and Supporting Community Provision**

- 3.3 The assessment identified the positive impact the AAP is likely to have on the delivery of a range of good quality housing and facilities to cater for a successful city centre community for the next 15 – 20 years. These community facilities are considered very important as they provide places for the fostering of good relations between groups.
- 3.4 The planned delivery of a range of good quality housing offer is considered to increase activity and footfall within the city centre during evening and night time hours, thus contributing towards a reduction 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.

## **Shopping and Leisure**

- 3.5 The planned delivery of an improved night time leisure uses are considered to increase activity and footfall within the city centre during evening and night time hours, thus contributing towards a reduction 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. The retail strategy for the AAP is to support retail and leisure growth within the city centre. This is considered likely to have a positive impact on areas and communities within and around the city centre, help contribute to meeting local needs, provide a range and choice of shops and 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.

## **Business**

- 3.6 The AAP will allocate a number of sites for the delivery of major jobs growth within the city centre. This planned delivery 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 or those currently without employment.

## **Further and Higher Education**

- 3.7 The proposed planning strategy for the Learning Quarter is protect area from competing non-education development, which will safeguard the existing education offer from Bradford College and the University of Bradford. This is considered to secure the present offer and allow for the expansion of learning facilities and student living. This safeguarding of the University and College areas is considered to have a positive impact the fostering of good

relations between groups as the area is considered a social and community hub and thus a place for people to congregate.

### **Movement**

- 3.8 Improvements to the City Centre Stations will also aid in creating a safe and secure environment for people arriving and leaving the centre. 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 these areas as they can suffer from reduced usage late at night. The provision of a safe and inclusive public realm through the adoption of Access for All and creating a safe and secure environment for people travelling through the City Centre by foot or bike is considered to have a positive impact upon advancing equality of opportunity between different groups.

### **Built Form and Public Realm**

- 3.9 The AAP is also considered to aid in the building good relationships between groups by encouraging residents to visit and congregate in the City Centre's high streets and other retail areas during evening / night time hours, due to the improved visual appearance of these areas as a result of the Built Form (Design) and Public Realm Policies and supporting proposals put forward in the AAP.
- 3.10 Taking this into account, 'Bradford City Centre Area Action Plan' is likely to have a positive impact upon protected characteristics.

## Initial Equalities Impact Assessment Template

## Appendix 1

<b>Department:</b> Regeneration and Culture –  Planning, Transportation and Highways  Local Development Framework Group	<b>Completed by (lead):</b> Ben Marchant	<b>Date of initial assessment:</b> 12/12/2012 <b>Revision Dates:</b> 25/11/2015
<b>Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)</b>	Bradford City Centre Area Action Plan	
<b>Is this existing or new function/policy, procedure, practice or decision?</b>	To supersede sections of the existing Replacement Unitary Development Plan relating to the City Centre	
<b>What evidence has been used to inform the assessment and policy? (please list only)</b>		
City Centre AAP Transport Study City Centre AAP Infrastructure Delivery plan City Centre AAP Green Infrastructure Study City Centre AAP Ecological Assessment City Centre AAP Viability Assessment City Centre AAP Sustainability Appraisal City Centre Neighbourhood Development Frameworks		

<b>1. Describe the aims, objectives or purpose of the function/policy, practice, procedure or decision and who is intended to benefit.</b>	<p>The City Centre Area Action Plan, as the statutory development plan, will set out planning policies to guide development proposals and associated infrastructure in the city centre, along with details of how these proposals will be delivered. It will also be used to determine planning applications in the city centre over the next 15 years.</p> <p>The City Centre Area Action Plan is needed in order to:-</p> <ul style="list-style-type: none"> <li>• Deliver proposed growth of the city centre over next 15 years (as established in the Local Plan – Core Strategy) through series of development proposal statements and planning policies;</li> <li>• An up to date development plan with a catalogue of potential developments sites will provide certainty to investors and developers;</li> <li>• Stimulate regeneration through use of planning tools such as Local Development Orders (LDOs);</li> <li>• Assist with land assembly through, for example, Compulsory Purchase Orders (CPO) to enable development and critical infrastructure;</li> <li>• Protect and enhance built heritage whilst proactively accommodating new developments;</li> <li>• Ensure developments are of an appropriate scale, mix and design quality.</li> </ul>
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		<p>It is considered that the AAP will bring benefits for the following areas within the city centre:</p> <ul style="list-style-type: none"> <li>• City Living and Community Provision</li> <li>• Shopping and Leisure</li> <li>• Business</li> <li>• Higher and Further Education</li> <li>• Movement</li> <li>• Built Form</li> </ul>		
<p><b>The Public Sector Equality Duty requires the Council to have “due regard” to the need to:-</b></p> <p>(1) eliminate unlawful discrimination, harassment and victimisation;  (2) advance equality of opportunity between different groups; and  (3) foster good relations between different groups (see guidance notes)</p>		<p><b>2. What is the level of impact on each group/ protected characteristics in terms of the three aims of the duty?</b></p> <p><b>Please indicate high (H) medium (M), low (L), no effect (N) for each.</b></p>	<p><b>3. Identify the risk or positive effect that could result for each of the group/protected characteristics?</b></p>	<p><b>4. If there is a disproportionately negative impact what mitigating factors have you considered?</b></p>
<b>Protected characteristics</b>	<b>Age</b>	N	Positive Impact – See Text in Main Report	N
	<b>Disability</b>	N	As Above.	N
	<b>Gender reassignment</b>	N	As above	N
	<b>Race</b>	N	As above	N
	<b>Religion/Belief</b>	N	As above	N
	<b>Pregnancy and maternity</b>	N	As above	N
	<b>Sexual Orientation</b>	N	As above	N
	<b>Sex</b>	N	As above	N
	<b>Any other area</b>	Poverty/Social Deprivation	As Above	N

<p><b>5. Has there been any consultation/engagement with the appropriate protected characteristics?</b></p>	<p><b>YES</b> <input type="checkbox"/></p>	<p><b>NO</b> <input type="checkbox"/></p>
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<b>6. What action(s) will you take to reduce any disproportionately negative impact, if any?</b>		
<b>7. Based on the information in sections 2 to 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment?</b> (recommended if one or more H under section 2)	<b>YES</b> <input type="checkbox"/>	<b>NO</b> <input checked="" type="checkbox"/>
<b>Assessor signature:</b> Ben Marchant	<b>Approved by:</b> Bhupinder Dev	<b>Date approved:</b> 04/12/2015