

Equality Impact Assessment Form (Draft Live Form)

Reference –

Department	Place	Version no	
Assessed by	Catherine Crosswaite	Date created	25/06/2025
Approved by		Date approved	
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Section 1: What is being assessed?

1.1 Name of proposal to be assessed

1.1.1 Statement of Community Involvement (SCI).

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

- 1.2.1 The Council is legally required to produce a Statement of Community Involvement (SCI) every 5 years. This sets out how the Council will involve the community in the planning process. The previous SCI was adopted in 2018 with a later 2021 Addendum in light of Covid-19 restrictions. The latest SCI has been prepared taking account of changes to statute and regulations / orders and the increased use of digital technology in planning.
- 1.2.2 The review of the Statement of Community Involvement (SCI) sets out how the City of Bradford Metropolitan Council will engage the public in the planning process. The SCI describes how the public, businesses, stakeholders and interest groups within the local authority areas can engage in the creation/influence local planning policy and the planning application process which shapes where we live and work. This is essential to help improve understanding and openness of the planning process.
- 1.2.3 There is a legal requirement on Local Planning Authorities (LPAs) to undertake public consultation on local plans, neighbourhood plans and planning applications. It is important that this is undertaken in a cost-effective, efficient and proportionate manner. This SCI is an important document as it will establish a minimum standard of consultation and publicity on planning matters for City of Bradford Metropolitan District Council.
- 1.2.4 The SCI covers the following roles and responsibilities of the planning service:
- Planning Policy including the production of planning policy documents including the Local Plan.

- Neighbourhood planning setting out how the councils will assist groups who are preparing neighbourhood development plans, and
- Development Management including how the councils consider and publicise planning applications.

1.2.5 The Council is committed to treating everyone fairly and justly and wants to ensure that everyone gets an opportunity to be involved in the planning process. It is recognised that consultation and engagement activities are constantly evolving, and this SCI will be revisited at regular intervals to ensure it is fully up-to date and reflects local and national priorities, practices and policies.

1.3 Stage 1 Assessment

1.3.1 In order to assess whether this proposal requires a full EqlA, a stage 1 scoping assessment against protected characteristics and additional considerations is outlined below in **Table 1**.

Table 1: Stage 1 Scoping

Protected Characteristics:	Impact Y/N
Age	Y
Disability	Y
Gender reassignment	N
Race	Y
Religion/Belief	Y
Pregnancy and maternity	N
Sexual Orientation	N
Sex	Y
Marriage and civil partnership	N
Additional Consideration:	
Low income/low wage	Y
Care Leavers	N

Section 2 - Stage 2: Full Equality Impact Assessment

2.1 Introduction

- 2.1.1 The full impact assessment process outlined below, examines what the impact of the proposal is likely to be on protected groups, low-income groups and care leavers. The Equality Act 2010 requires that we give due regard to advancing equality of opportunity and fostering good relations. Will your proposal support either of these two aims? It is particularly important that positive impacts are highlighted when they affect a lot of people or have high impact on a small number of people.

2.2 Will this proposal advance equality of opportunity for people who share a protected characteristic and/or foster good relations between people who share a protected characteristic and those that do not? If yes, please explain further. Please ensure you have understood the meaning of ‘equality of opportunity’ and ‘fostering of good relations’ and ‘protected characteristics’ - before answering this part.

- 2.2.1 Yes. The aim of the SCI is to ensure that, as far as possible, all parts of the community have the opportunity to get involved in preparing planning documents and processing planning applications. In addition to setting out the Council's publicity and consultation procedures, the SCI also outlines what we expect applicants to do before they submit a planning application.
- 2.2.2 When the Council consults on planning policy documents and planning applications it must comply with the SCI. The SCI ensures the planning department engages effectively and helps to foster good relations with local communities and engage them in the planning process.

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

- 2.3.1 The SCI will impact on a range of user groups. Generally, it will have a positive impact on all people who live and work in Bradford because it encourages engagement with stakeholders and the wider community at various opportunities in the planning process. By providing clarity about when and how to get involved and the varied methods for notifying, consulting and responding, it is beneficial for various sections of the community as defined in the Equality Act 2010. Specific reference is made to promoting accessible and inclusive consultation procedures so no group should be disadvantaged.
- 2.3.2 There is also an aim to increase the involvement of people on the basis of age, race, religion, sex and disability who may not usually engage in planning issues. The SCI provides the framework for consultation that the Council's Local Plan must comply with. By ensuring that all groups within the community are given the opportunity to participate in the planning process, this gives a greater chance for issues impacting different groups to be incorporated into the decision-making process, which in turn will create more inclusive decisions. This may involve making reasonable adjustments to allow people with a protected characteristic to access to the same information as all other people.

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

Age

- 2.4.1 Typically planning has less representation in consultations from younger people. Younger people (from younger children to teenagers) have historically been underrepresented in previous planning consultations and struggle to engage with the language and topics of planning although its issues are very important to daily life.
- 2.4.2 More senior members of our communities can also feel excluded from consultations depending upon the extent of digital access and ability to travel or mobility difficulties making access to venues difficult.
- 2.4.3 The SCI aims to consult in a way that ensures age is not a barrier to involvement in consultations from an early stage.
- 2.4.4 Addressing Impact Positively: Reduce the risk that the SCI will continue to perpetuate existing gaps in consultation engagement through targeted interventions and better use of existing forums (including youth and senior citizens).

Disability

- 2.4.5 There are a number of sensory, learning and physical disabilities that can impact a person's ability to engage with consultations.
- 2.4.6 Disabled people can feel disengaged with the planning process due to the lack of accessibility to consultation locations, inaccessible documents that are not appropriate to different needs and difficulty in engaging with online and physical documents.
- 2.4.7 Addressing Impacts Positively: Ensure events and consultation materials are accessible and the LPA is flexible over meeting information needs. Maximise opportunities to use assistive technology.

Race

- 2.4.8 People from different ethnic groups may face barriers which make it harder for them to respond to consultations or engagement. This could include language barriers, cultural barriers making people less likely to access 'official' spaces where consultations and engagement activities are sometimes carried out/advertised. It is imperative to understand and tackle these barriers in order to facilitate the increased engagement of ethnic minority groups.
- 2.4.9 Addressing Impacts Positively: Reducing the risk that future consultations are developed that compound any barriers to accessing consultation documents by not being inclusive enough. Review and further development neighbourhood outreach options including delivering in community events or attending existing community activities and events. Further development of local advocates and champions.

Religion

2.4.10 With a varied mix of religions across the Bradford District, it is important to respect and celebrate different beliefs, practices, celebrations and religious holidays. These may impact upon the ability of people to attend consultation and engagement events.

2.4.11 Addressing Impacts Positively: Enhanced attention and learning regarding religious beliefs, practices, celebrations and holidays will reduce the risk of inappropriately timed events, reducing community capacity to contribute planning.

Sex

2.4.12 Childcare responsibilities are still primarily undertaken by women alongside other caring responsibilities which may be barriers to attending consultations. Cultural differences with respect to gender may impact upon effective engagement with women. For example, some Muslim women in the Bradford district may face cultural barriers to engage effectively with the planning process due to faith sensitivities.

2.4.13 Planning and design professions also have in-built gender biases when it comes to such matters as policy development or sensitivities over development considerations.

2.4.14 Addressing Impacts Positively: Reduce the risk that the SCI will continue to perpetuate existing gaps in consultation engagement for women and influencing policies and developments through targeted interventions including workshops and outreach work.

Low income/low wage

2.4.15 Those on lower incomes may have barriers to engaging with consultation events and with online materials. Physical travel may also be a barrier to engagement. They may also not be able to access online consultation documents due to digital poverty.

2.4.16 Addressing Impacts Positively: Reduce the risk that the SCI engagement events may exclude those on lower incomes who may not be able to visit venues or online materials, through the focus upon central easy to access locations and ensuring free access to information through deposit points and libraries.

Care Leavers

2.4.17 Consultation barriers for care leavers include safeguarding, informed consent, accessibility and the confidentiality of participants.

2.4.18 Addressing Impacts Positively: Offer online events, work with the Leaving Care Service to offer bespoke consultation events and anonymise feedback forms.

2.5 Please indicate the level of negative impact on each of the protected characteristics?

2.5.1 A proportional approach to understanding the level of impact is set out below in Table 2.

Table 2: Level of Impact

Protected Characteristics:	Impact (H, M, L, N)
Age	M
Disability	H
Gender reassignment	N
Race	H
Religion/Belief	L
Pregnancy and maternity	N
Sexual Orientation	N
Sex	M
Marriage and civil partnership	N
Additional Consideration:	
Low income/low wage	L
Care Leavers	N

(high (H), medium (M), low (L), no effect (N) for each)

2.6 Please state what mitigations are to be brought into place for any group scoring a medium and above. If no mitigations are being considered, the reasons for this should also be included here.

Age

- 2.6.1 The SCI aims to improve engagement by involving representatives from a cross-section of stakeholders within Bradford, ensuring that different needs and views of groups within the community are considered.
- 2.6.2 Specific techniques that may attract younger people include promoting electronic methods of consultation and social media. Where appropriate encouraging the use of community events/displays, producing summaries of material to make information easier to understand, visiting local schools and colleges and using digital technology to convey complex planning issues in a visual format.
- 2.6.3 Further focused events and engagement with the youth ambassadors / youth council...
- 2.6.4 The engagement and access of Bradford's senior citizens to consultations through digital means may be reduced due to lack of digital resources. In these circumstances it may therefore be appropriate to promote the consultation through more physical means such as posters, community noticeboards, and letters, whilst allowing hardcopy responses. In-person events at various locations around the

district could help improve accessibility to this age range. This could also include attending senior citizen forum events.

2.6.5 In both age groups it may also be appropriate to engage with known groups or organisations across Bradford that work with the relevant age groups, for example youth groups through neighbourhood officers and Age UK.

2.6.6 This process will have a positive impact by increasing awareness of planning opportunities and enhancing opportunities to be involved and respond to planning consultations.

Disability

2.6.7 The SCI sets out a number of methods that could assist people with disabilities:

- Written information will be made available on request in accessible formats.
- The consultation document can be made available on request in large copy print, audio cassette or Braille and officers are available to meet individuals and talk issues through
- Summaries of long documents will be produced when relevant to ensure information is easily accessible.
- The aim to improve engagement by promoting electronic methods of consultation and social media may help some people with disabilities access and respond to consultation materials.
- Events will be at accessible locations in terms of physical access and assistive technology. Tailored support for the use of assistive technology online.
- Where appropriate events may be held online to allow individuals to take part who may not be able to attend in-person events

Race

2.6.8 A range of consultation principles and methods are proposed to ensure that consultations are inclusive so all sectors of the community should benefit. This can also include attending existing community activities and events and through outreach via neighbourhood partnerships and community groups.

2.6.9 For those who do not have English as a first language consultation materials can be produced through the use of digital technology which can help translate documents, as well as using plain English and making documents easier to understand.

2.6.10 The SCI also promotes targeted consultation where relevant to help engage specifically with particular groups, including through liaison groups, for example Gypsy and Travellers.

Religion

2.6.11 The SCI aims to improve engagement by involving representatives from a wide range of different communities across Bradford which can have different religions, the SCI wants to ensure that all the views of different groups are reflected and considered. The consultations will be mindful of religious beliefs, practices, celebrations and holidays to support greater community engagement.

Sex

2.6.12 To reach women from across all different communities within Bradford, collaborative working with partner organisations needs to take place to ensure effective consultations are carried out. For example, working with women's groups such as the Muslim Women's Network that will help to engage Muslim women in the planning process. The council could hold bespoke online or face-to-face events exclusively for women to address any faith sensitivities or barriers to engagement. Events could also be held in the morning/lunchtimes or within school hours to encourage mothers to attend.

2.6.13 Policies and development proposals would also benefit significantly from an assessment to review gender bias and options to improve focus. This could be through workshops and events.

Low income/wage

2.6.14 A series of face-to-face consultation events could take place across different accessible locations in the Bradford district to enable people to walk to events. As well as face to face consultations documentation could be accessed through neighbourhoods' officers or community hubs and is available online at local libraries for those unable to access the internet at home.

Care Leavers

2.6.15 Consultations need to be a safe and inclusive space for everyone. Work with social care and other council departments to effectively engage with Care Leavers and encourage participation.

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.

- 3.1.1 All relevant council departments will be notified about the consultation and have the opportunity to inform its content. The Council can make changes to the SCI through consultation comments or other noted changes. Pre-consultation engagement has been undertaken within the planning service with development management colleagues supporting the development of the statement through redrafted content.
- 3.1.2 A specific working session will be held in advance of finalising the Draft SCI for consultation with Neighbourhood Services to ensure the strategy provides sufficient focus and practical outputs to support effective community engagement.
- 3.1.3 A range of Voluntary and Community Sector organisations will be consulted to help promote events and distribute consultation materials, where appropriate and applicable.

Section 4: What evidence have you used?

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

- 4.1.1 The assessment is informed by feedback from the Local Plan Regulation 18 consultation in 2021 and barriers to engagement identified by planning professionals and those delivering engagement platforms¹.
- 4.1.2 Statistical information has its roots in the Authority Monitoring Report and more generally the Census 2021 datasets.

4.2 Do you need further evidence?

- 4.2.1 It is expected that the formal consultation in the SCI will yield further gaps in information and evidence. This will be brought into the finalised post-consultation update of the SCI and also any revisions required on the EQIA.

Section 5: Consultation Feedback

5.1 Introduction

- 5.1.1 It is vitally important that the proposal (SCI) is consulted on with relevant protected groups and key partners to ensure the potential impact is understood. Some provisional engagement feedback is provided below on previous local plan engagement exercises.

¹ Commonplace – Engaging for the Future January 2021

5.2 Local Plan Engagement – Previous Feedback

- 5.2.1 In the Core Strategy Consultation in 2014, an ‘Equality and Diversity Monitoring Form’ was included as part of the representation form to be filled in. 226 of 522 forms were completed. The breakdown of those that completed the form showed a larger proportion of male participants, and higher participation from age cohorts 36 – 65 years plus (a very low number of younger participants), all participants classed themselves as heterosexual and most saw themselves of white ethnic origin. This is why it is fundamental for the Statement of Community Involvement to directly engage and remove barriers to engagement for underrepresented groups across the district.
- 5.2.2 The Core Strategy Partial Review consultation had issues regarding turn out rates for the face-to-face consultations which were held across 4 different locations within Bradford. City, Keighley, Ilkley and Saltaire. Events were held at lunch times and evenings. There was feedback from community members in Keighley they had not known about the event – Press Release in Keighley News was only advertised a couple of days before. Need to ensure advertisements are published in good time. Need to use social media and community groups and forums including neighbourhood officers to ensure early engagement. Engagement levels were very low overall despite community feedback that the events were accessibly located and well resourced by the LPA.
- 5.2.3 During the Draft Bradford District Local Plan in 2021 consultations (due to COVID restrictions) were held exclusively online with a positive attendance rate. This showed an effective way of engaging with communities and a wider demographic. Neighbourhood officers also helped to engage with young people and local communities. There was criticism from some communities over the lack of local community events and meetings – particularly where there were strong opinions regarding development proposals.
- 5.2.4 While attendance at online events varied according to location and topic, the consultation yielded circa 30,000 representations in total and from a wider range of people than usually engaged. At the time the Council was not sufficiently experienced in undertaking online events at scale but there has been considerable learning since this time and online platforms and tools have grown significantly.
- 5.2.5 The council hosts a Mobility Planning Group, a forum which allows service providers and service users to resolve issues relating to access and movement of people throughout the district using all methods of transport. The fundamental aim of the group is to develop appropriate solutions to mobility problems, therefore improving confidence for people to travel in and around the district and ensuring all forms of travel are made more inclusive. The group has a positive working relationship with service providers on development and policy proposals which affect the movement of people and will continue to be consulted on planning issues including the Local Plan.

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

This section of the EQIA is likely to be updated following consultation on the SCI.

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

This section of the EQIA will be updated following financial feedback – noting also the Council's legal requirements in relation to equalities.

5.5 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.

This section will be updated in due course.