City of BRADFORD METROPOLITAN DISTRICT COUNCIL

Equality Impact Assessment Form (Draft Live Form) Reference –

Department	Growth	**Version no**	4
Assessed by	Stephen Hay	**Date created**	21/09/26
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Section 1: What is being assessed?

1.1 Name of proposal to be assessed

1.1.1 Bradford District Local Plan – Publication Draft (Regulation 19)

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

1.2.1 In accordance with the Planning & Compulsory Purchase Act 2004 (as amended), the Council has a duty to prepare and maintain an up-to-date Local Plan, for the Bradford District. In line with the agreed Local Development Scheme (LDS) adopted by the Council on 14th October 2025, the Council has progressed work on the new Local Plan in line with legal, regulatory and national policy and guidance.

1.2.2 The Local Plan sets out how the district will grow sustainably over the next 17-18 years, features new sites for housing and employment and a range of policies which will help guide development and the determination of planning applications. It also sets out information on a variety of other priorities including transport, open spaces, green infrastructure and places of ecological value across the district.

1.2.3 The main delivery outputs from the Local Plan include physical regeneration of key urban areas including the City Centre, Keighley and Shipley and the provision of new housing – a minimum of 33,669 units across the plan period (2025-2043) and at least 110.5 ha of employment land to meet the needs of local businesses and support job growth.

1.2.4 The plan also focuses upon retaining and enhancing a wide range of key natural and environmental assets. This includes Designation of circa 1,693 open spaces (almost 2,800 ha of land), plus protection for 108 local wildlife sites, 16 local

geological sites, 13 Local Nature Reserves (LNR), 4 SSSIs and 1 SPA/SAC and a new National Nature Reserve.

1.2.5 The Local Plan (Publication Draft) is now subject to a proposed consultation as part of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This Equalities Impact Assessment (EqIA) accompanies the Local Plan as a live document and should also be read alongside the Sustainability Appraisal which informs the Local Plan and features integrated equalities and health impact assessments.

1.2.6 Consultation on the Local Plan must follow the adopted Bradford District Statement of Community Involvement (2025-30) and the specific regulatory requirements for this stage of plan-making which are focused upon legal compliance and whether the plan is sound in terms of meeting National Planning Policy Framework (2024) requirements concerning whether it has been positively prepared, justified, effective and consistent with national policy.

1.2.7 The Local Plan has been previously subject to consultation under Regulation 18 and was supported by an Equalities Impact Assessment in 2021.

1.2.8 The Local Plan has a particular structure which is detailed below:

- **Introduction - Plan Directions and Context** – including the wider context to the development of the plan and the district portrait.
- **Plan Strategy – vision, strategic objectives and strategic policies** – overall vision for the district and linked set of strategic objectives together with the spatial growth strategy for the district and high-level strategic policies which set out the overall key land use planning directions with key diagram.
- **Thematic Planning Policies** – policies covering housing, the economy, retail and town centres, transport and connectivity, design and place-making, infrastructure, climate and resources, natural and historic environments, minerals and waste, and implementation and delivery.
- **Settlement Policies and Site Allocations** – policies for settlements, areas and site allocations for housing and employment.
- **Section 6: Plan Implementation and Monitoring** – plan delivery, indicators and monitoring framework.

1.2.8 The EqIA is focused mainly upon the vision, objectives and policies within the plan rather than the detail of individual site allocations, which are themselves often covered by plan policy requirements.

1.3 Stage 1 Assessment

1.3.1 In order to assess whether this proposal requires a full EqIA, 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	Y
Race	Y
Religion/Belief	Y
Pregnancy and maternity	Y
Sexual Orientation	Y
Sex	Y
Marriage and civil partnership	N
Additional Consideration:	
Low income/low wage	Y
Care Leavers	Y

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 overall aim of the Local Plan is to deliver sustainable development through its process of consultation and plan development and in terms of its final policy conclusions. The plan is supported by a considerable level of evidence material on such issues as housing need, specialist housing requirements, good design and healthy places and employment need to name but a few, which have then informed policies within the plan. It presents a balanced and rounded approach to planning for the district over a forecast period of almost 20 years and recognises that the needs of local populations are changing and will continue to change including the type and range of households and a move towards ageing society, although Bradford currently has a younger ager profile than many parts of the country. Also see **Appendix 1** for detailed analysis.

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

2.3.1 The proposed plan aims to positively plan for people who have been subject to discrimination, harassment or victimisation, in particular through housing policies which seek to meet the needs of a diverse range of people across Bradford's varied communities, including for example Gypsies and Travellers, senior residents and children in care. There is also a specific focus in the plan on accessibility and housing standards and improving the adaptability of buildings. Many other policies also include positive impacts for people within protected characteristic groups as detailed further within **Appendix 1**.

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.

Due to the complex nature of the local plan and its varied policies, **Appendix 1** to this report provides a combined table which considers further matters raised under 2.2 (equality of opportunity); 2.3 (positive impacts and eliminating discrimination) and this section 2.4 on negative impacts / disproportionate impacts on protected characteristics.

2.5 Please indicate the <u>level</u> 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. The plan has generally a positive (with only limited low level negative impacts identified) or neutral effect in each of the protected characteristics.

Table 2: Level of Impact

Protected Characteristics:	**Impact** (H, M, L, N)
Age	L

Disability	L
Gender reassignment	N
Race	L
Religion/Belief	L
Pregnancy and maternity	L
Sexual Orientation	L
Sex	L
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.

Not detailed due to low negative effect levels or neutral, however the production of the Local Plan has been subject to an ongoing and iterative process under the Strategic Environment Assessment regulations, together with a broader assessment of social and economic impacts. After each stage of the plan's production to date this iterative exercise has informed the next evolution of land use policies and proposals, introducing mitigation measures at each stage. This process has helped the plan achieve the conclusion of low negative effects or neutral effects at this stage of the process.

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 The Local Plan is supported by a wide range of evidence – some of which is multi-commissioned as well as a Local Infrastructure Plan which considers the impact of the local plan in such infrastructure matters as education, transport, health and utilities. A summary of service engagement is outlined below in **Table 3**:

Table 3: Dependencies – Local Plan Evidence and Services

Evidence or Impact Assessments	Services Involvement / Engagement
Settlement Study	Informed by education service input on pupils / school demand

Green Belt Assessment	None noted
Employment evidence / addendum	Informed by economic development service inputs
Retail and Leisure Study	Informed by economic development and regeneration services
Strategic Housing Market Assessment	Informed by housing services and adult commissioning
Gypsy and Traveller Accommodation Assessment	Informed by housing services, environmental health and special projects
Green and Blue Infrastructure Strategy	Informed by landscape and design, sports and recreation, public health, climate change, ecology,
Strategic Flood Risk Assessment (various)	Informed by flood specialists, climate change and wider stakeholders
Heritage Impact Assessment	Informed by conservation specialists and wider stakeholders
Integrated Sport Assessment	Informed by sport and creation, public health and wider stakeholders
Open Space Assessment	Links to other work streams
Transport modelling and assessment	Informed by transport policy, highways, climate change and wider stakeholders
Infrastructure Delivery Plan	Various study input teams, plus education, health/ public health and wider stakeholders
Sustainability Appraisal	Multi-service input in scoping / framework update
Habitats Regulations Assessment	Ecology, transport policy, climate change

Section 4: What evidence have you used?

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

4.1.1 Back up information is contained within the evidence database connected to the material detailed within Table 3, district portrait in the Local Plan, authorities monitoring report and settlement study profiles.

4.2 Do you need further evidence?

4.2.1 None identified at this stage in terms of technical evidence, but the consultation may provide feedback on gaps in material and impacts from the delivery of the plan not highlighted to date.

Section 5: Consultation Feedback

5.1 Introduction

5.1.1 This EqIA forms part an iterative process started on the fully integrated Local Plan with the consultation on the Regulation 18 EqIA in 2021 and subsequent feedback.

5.2 Local Plan Engagement – Previous Feedback

5.2.1 Feedback from the Regulation 18 consultation on equalities related issues included the following:

- **Range of Community Engagement** - Limited nature of community engagement during the consultation period which did not allow members from various parts of the community to fully engage – including senior residents and people from different ethnicities as the consultation was online only due to the COVID restrictions at the time.

- **Growth and disproportionate impact on communities** - Disproportionate releases at Holme Wood South, coupled with new road infrastructure would have severe and permanently detrimental effects on the population of Tong ward which does not seem to have been taken into account in the Equalities Impact Assessment and that these releases and the equalities impact should be objectively reassessed before the Regulation 19 stage.

- **Emerging planning policies** – technical comments on housing standards, types and range of housing.

5.2.2 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).

Feedback in the last consultation is detailed within the Regulation 18 Consultation Statement with key issued identified above. The feedback informed the further technical analysis and site assessment. This has informed the content and approach of both policies and release of sites (including site requirements to meet local needs where appropriate).

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

To be detailed as part of the summary of representations following publication of the local plan when considered by Full Council.

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.

To be considered when the representations are reported to Full Council. The issues will then be considered as part of the examination in public and subject to further consultation where changes are proposed, together with an EqIA.