

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	Corporate Policy and Strategy		
Service Area:	Carbon Reduction		
Name of the proposal :	Harewood Whin Green Energy Park (GEP)		
Lead officer:	Alex Eburne/Shاون Gibbons		
Date assessment completed:	15/12/2023		
Names of those who contributed to the assessment :			
Name	Job title	Organisation	Area of expertise
Alex Eburne	Sustainability Project Manager	CYC	Sustainability
Shaun Gibbons	Head of Carbon Reduction	CYC	Carbon Reduction
Claire Foale	Assistant Director Policy and Strategy	CYC	Policy and Strategy

Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.
	<p>Initiate a project to develop the capped landfill site at Harewood Whin into a Green Energy Park (GEP). The project will assess a combination of low-carbon technologies and solutions to maximise and optimise the desirable outcomes for the council.</p> <p>The output of this work will be a Strategic Outline Case with a preferred way forward identified from a longlist of technical solutions. This includes:</p> <ul style="list-style-type: none">• Ground-mounted solar photovoltaics• Onshore wind• Green hydrogen production and utilisation• Battery energy storage• Electric vehicle charging infrastructure• Council depot

1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	<p>UK Government Policy</p> <p>The UK has committed to a legally binding target of net zero emissions by 2050, with interim targets set out through its Carbon Budgets. The UK government has also committed to an interim 78% reduction in emissions and clean electrification of the grid by 2035.</p> <p>York & North Yorkshire Devolution & Net Zero Funding</p> <p>The York and North Yorkshire Mayoral Combined Authority (YNYCA) will be a legal body established by parliament which brings together the local authorities of City of York Council and North Yorkshire Council. Both councils provisionally approved the creation of the YNYCA in February 2023. The York and North Yorkshire Combined Authority Order 2023 to establish the YNYCA was laid in parliament on the 7th November 2023.</p> <p>Within the proposed York and North Yorkshire Devolution Deal, published August 2022, it was agreed “The Government will provide £7 million investment that will enable the area of York and North Yorkshire to drive green economic growth towards their ambitions to be a carbon negative region. This investment is subject to agreement of a business case from the area”. To ensure readiness to deliver this funding prior to the York and North Yorkshire Mayoral Combined Authority (YNY MCA) being established, the Devolution Joint Committee agreed an interim process at the 30th November 2022 Joint Committee meeting. This agreement was for the York and North Yorkshire Local Enterprise Partnership (LEP) to administer the fund, on behalf of the YNY MCA.</p>

In February 2023, the council applied for revenue funding from the £1m of funding available through the Project Development Support strand. The council successfully secured £243,500 of revenue funding to support project development activities and develop the business case for the project. There may be further funding opportunities in the future to support with later stages of development and delivery of the project.

York and North Yorkshire Local Enterprise Partnership (YNYLEP)

York and North Yorkshire's Routemap to Carbon Negative sets out the region's ambitious plans to be net zero carbon by 2034 and carbon negative by 2030. The proposed Green Energy Park project at Harewood Whin strongly aligns with the strategic priorities set out within the Routemap.

Local Planning Policy

The Green Energy Park project at Harewood Whin will require planning permission. As the Local Planning Authority (LPA), CYC will decide applications in line with its local plan and the national planning policies. The specific policies and guidance that apply to the project in the planning stage will differ depending on the technical solution(s) that the council intends to deliver as part of the Green Energy Park (i.e., solar photovoltaic, onshore wind, hydrogen electrolyers etc.).

HM Treasury Green Book

The [Green Book](#) is guidance issued by HM Treasury on how to appraise policies, programmes, and projects. The Treasury's five case model is the means of developing proposals in a holistic way that optimises the social / public value produced by the use of public resources. The HM Treasury's "[Business Case Guidance for Projects](#)" provides detailed guidance for the public sector on the development and

approval of capital spending projects. The business case for the Harewood Whin Green Energy Park project will be developed in accordance with the Green Book guidance and the Five Case model.

Waste Legislation

Local authorities are required to comply with a wide range of waste and recycling legislation. As a “waste collection authority”, CYC has a duty to collect “household waste”, under section 45 of the Environmental Protection Act 1990, as amended (EPA 1990). In addition, section 45A(3) of the EPA 1990 requires waste collection authorities to collect “at least two types of recyclable waste together or individually separated from the rest of the household waste”.

Yorwaste was established as a Local Authority Waste Disposal Company owned fully by North Yorkshire County Council in 1991 to manage the council’s landfill sites. In 1996 as part of a Local Government Review, City of York Council became a 22.27% shareholder of the company. The company provides services to York relating to Transfer Stations, processing recyclates, garden waste and management and transport of waste at the two Household Waste sites.

Harewood Whin is a capped landfill site, located within the Rural West York Ward. It is operated by Yorwaste as a materials recovery facility (MRF) and waste transfer station and encompasses a range of other waste management operations including landfill methane recovery, green waste composting, commercial and industrial recycling, liquid waste treatment and general household waste recycling. The site remains in the council’s ownership as a long-term liability and is controlled according to provisions in the Environmental Protection Act 1990 (EPA 1990).

Public Rights of Way (PRoWs)

	<p>A public right of way is a right by which the public can access along linear routes over land at all times. Although the land may be owned by a private individual, the public have a legal right across that land along a specific route. Public Rights of Way are located towards the eastern and western extents of the Harewood Whin site, allowing for links to Rufforth and Knapton.</p>
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1.3	Who are the stakeholders and what are their interests?
	<p>City of York Council</p> <p>The council will lead and fund the development of the project proposal and business case. As the Local Planning Authority, the council will play a key role in coordinating the planning process and granting or refusing planning permission. The council are also the freehold owners of the Harewood Whin site and are a minority shareholder of Yorwaste, the leaseholder of the Harewood Whin site.</p> <p>Yorwaste</p> <p>Yorwaste are the leaseholders of the Harewood Whin site and owner-operator of the waste management facilities on-site. Yorwaste have previously commissioned feasibility work, supported the council's funding bid, and have funded the submission of a planning application for a 28MW solar farm development at Harewood Whin.</p> <p>York & North Yorkshire Local Enterprise Partnership (LEP)</p> <p>Supportive of the Green Energy Park project and its alignment with the key strategic priorities set out in the York & North Yorkshire Routemap to Carbon Negative. The LEP are providing £243,500 of revenue funding to the council via the York & North Yorkshire Net Zero Fund to enable the project's development.</p> <p>North Yorkshire Council (NYC)</p> <p>The council are the majority shareholder of Yorwaste, the leaseholder of the Harewood Whin site. NYC have an interest in the development of Harewood Whin and may act as a potential delivery partner.</p> <p>York and North Yorkshire Mayoral Combined Authority (YNYCA)</p>

The York and North Yorkshire Mayoral Combined Authority (YNYCA) will be a legal body established by parliament which brings together the local authorities of City of York Council and North Yorkshire Council.

Rural West York Ward

The Harewood Whin site is located within the Rural West York Ward. The Ward will have a key interest in the project and will be closely engaged throughout the project's development to ensure that local residents' needs and concerns are addressed.

Rufforth with Knapton Parish Council

The Harewood Whin site is located within the Rufforth with Knapton Parish Council area. The Parish will have a key interest in the project and will be closely engaged throughout the project's development to ensure that local residents' needs and concerns are addressed.

The parish council will be provided with detailed information about the project in advance of determining a preferred project option and submitting a planning application. The parish council will also be invited to participate in further consultation once a planning application has been submitted and validated.

Hessay Parish Council

The Harewood Whin site is located in close proximity to the Hessay Parish Council area. The Parish will have a key interest in the project and will be closely engaged throughout the project's development to ensure that local residents' needs and concerns are addressed.

The parish council will be provided with detailed information about the project in advance of determining a preferred project option and submitting a planning application. The parish council will also be invited to participate in further consultation once a planning application has been submitted and validated.

Northern Powergrid

NPG are the local Distribution Network Operator (DNO) responsible for delivering electricity on behalf of suppliers from the national transmission system to 3.9 million domestic and business customers. NPG are responsible for managing the distribution network connection process. The council will be required to submit a G99 application to secure a connection offer for the Green Energy Park at Harewood Whin. NPG also contributed to the development of the North Yorkshire & City of York Local Area Energy Plan. NPG are supportive of the Harewood Whin GEP project and the opportunity it presents to increase large-scale distributed generation in York.

Statutory and Non-Statutory Consultees

Local planning authorities are required to undertake statutory consultations on proposed development as set out in Article 10 of the Town and Country Planning (General Development Procedure) Order 1995. The council will ensure that it consults with any statutory and non-statutory consultees as part of the planning process.

Other consultees

The council will also consult with neighbouring residents, landowners, and community groups. This will include, for example, Forestry England who are the tenants of York Community Woodland on the land adjacent to the Harewood Whin site.

<p>1.4</p>	<p>What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans.</p>
	<p>Outcomes</p> <p>The Harewood Whin GEP scheme aims to make use of a combination of low-carbon technologies and solutions to maximise and optimise the renewable energy generation, carbon savings, cost savings, and revenue generation potential of the site.</p> <p>The site has the potential to deliver up to 32MW of large-scale renewable generation through ground-mounted solar PV and/or onshore wind. This could generate up to 39GWh of electricity per annum – equivalent to 10,033 households – and create a secure supply of cheap renewable electricity in York. The York Local Area Energy Plan has identified that York will require around 1GW of local renewable energy generation in order to become self-sustaining and decarbonise the city’s energy system. The GEP at Harewood Whin will significantly contribute towards achieving this target.</p> <p>It could contribute towards annual carbon savings of up to 8,308 tCO₂e. Other technologies such as EV charging, hydrogen production, and battery storage could also be developed on site to provide additional carbon savings and revenue generation opportunities.</p> <p>Developing the Harewood Whin GEP project could serve as an “invest-to-earn” or “invest-to-save” scheme for the council depending on the commercial model adopted. Any revenues or savings derived from the scheme could be used to support key frontline services, making the city more affordable, and support a good quality of life for residents. There are also a range of potential community benefits that this project could provide including the provision of a community benefit fund and/or part community ownership of the asset.</p>

Alignment with council's policy framework

Council Plan 2023 – 2027

The Council Plan adopted in September 2023 identifies “Cutting carbon, enhancing the environment for future generations” as one of the council’s key priorities. Increasing sources of renewable energy is central to achieving this priority (see objectives 5.1-5.5).

The Council Plan identifies “A fair, thriving, green economy for all” as another of the council’s key priorities. The design, development, planning, and construction services required to deliver a GEP will provide an opportunity to return benefits to the local economy and develop the local supply chain capabilities.

York Climate Change Strategy 2022-2032

Increasing local renewable generation capacity across York is a key priority within the council’s Climate Change Strategy (in support of objective 7.1). Battery energy storage could also be delivered on site as part of the project supporting the council to improve energy flexibility and storage (in support of objective 7.2). Finally, there are a range of potential community benefits that this project could support including the provision of a community benefit fund and/or part community ownership of the asset (in support of objective 7.3).

To enhance any carbon savings, opportunities to generate additional carbon sequestration will be considered in the project development stage (in support of objectives 6.1 and 6.2). Carbon sequestration could, for example, be achieved through the planting of trees and hedgerows on the site.

York Local Area Energy Plan (LAEP)

	<p>The York LAEP estimates that 1 GW of local renewable generation will be required to decarbonise the city’s energy system. Currently, the City of York has a local renewable energy generation capacity of 23.5MW. To meet York’s growing electricity demand and transition towards net zero, a drive towards increasing local renewable energy generation capacity is urgently required.</p> <p>The former landfill site at Harewood Whin was identified within the LAEP as a suitable site for large-scale renewable energy generation. The proposed GEP could provide an additional 32MW of renewable capacity in York, and support York’s transition to a low-carbon energy system.</p>
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Step 2 – Gathering the information and feedback

2.1	What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.	
	Source of data/supporting evidence	Reason for using
	Our Big Conversation 1 – public attitude survey	To provide a snapshot of individuals thoughts and priorities on climate change and climate action (including energy supply).
	Our Big Conversation 1 – business survey	To provide a snapshot of businesses thoughts and priorities on climate change and climate action (including energy supply).
	Our Big Conversation 2 – public engagement	Broadcast – to provide a snapshot of individuals thoughts and priorities on climate change and climate action (including energy supply).
	Our Big Conversation 2 – focus groups	Targeted towards under-represented cohorts to provide individuals thoughts and priorities on climate change and climate action (including energy supply).

York Local Area Energy Plan (LAEP)	Stakeholder engagement conducted to identify the most cost-effective preferred pathway and sequenced plan of proposed actions to achieving York's net zero goal.
Climate Change Strategy - Equalities Impact Assessment	An assessment of the equalities impacts of the council's climate change strategy and proposed actions (including energy supply).

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.	
Gaps in data or knowledge		Action to deal with this
Local stakeholder opinion		<p>The council will develop a community engagement and communications plan for the project upon initiation. The council will ensure that it engages with the local community at an early stage and undertake regular engagement throughout the project's development and delivery.</p> <p>The council will need to undertake engagement in the period preceding the submission of a planning application in order to inform and refine its development proposal (pre-planning). This will include direct communication with local residents, community groups, businesses, landowners, ward councillors, parish councillors, and any other consultees within an agreed radius of the site. Engagement methods could include preparation of a webpage, online consultation, leaflet/letter drops, Q&A events, and local information sessions etc.</p> <p>The council will ensure that its engagement approach is design to be accessible and inclusive to enable widespread participation and target hard-to-reach groups in the local community.</p>

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	No impacts identified.	0	N/A
Disability	<p>Some negative and positive impacts have been identified:</p> <p>Inability to access physical venues for stakeholder engagement events due to disability.</p> <p>Inability to access digital engagement materials and/or participate in online consultations/engagement events due to disability.</p> <p>Initial site designs may exclude / fail to cater for the needs of disabled employees and visitors.</p> <p>Provide community benefits such as the provision of a community benefit fund; part community ownership of the asset; and/or targeted support for disabled households.</p>	<p>-</p> <p>-</p> <p>-</p> <p>+</p>	<p>L</p> <p>L</p> <p>L</p> <p>L</p>
Gender	No impacts identified.	0	N/A

Gender Reassignment	No impacts identified.	0	N/A
Marriage and civil partnership	No impacts identified.	0	N/A
Pregnancy and maternity	No impacts identified.	0	N/A
Race	No impacts identified.	0	N/A
Religion and belief	No impacts identified.	0	N/A
Sexual orientation	No impacts identified.	0	N/A
Other Socio-economic groups including :	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer	No impacts identified.		
Low income groups	<p>Some negative and positive impacts have been identified:</p> <p>Inability to access and participate in in-person or online engagement events.</p> <p>Provide community benefits such as the provision of a community benefit fund; part community ownership of the asset; and/or targeted support for low-income households.</p>	<p>-</p> <p>+</p>	<p>L</p> <p>L</p>
Veterans, Armed Forces Community	No impacts identified.		

Other	Potential to generate local employment opportunities and return benefits to the local economy.	+	L
	Health risks associated with exposure to technologies developed as part of the Green Energy Park project.	-	L
Impact on human rights:			
List any human rights impacted.	Potential temporary restrictions to existing Public Rights of Way to facilitate development.	-	L

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
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Disability

In accordance with the Equality Act 2010, the council will take steps to ensure that its project engagement and consultation plans and mechanisms are accessible to Disabled people. The council will aim to anticipate potential barriers Disabled people might face and take steps to address those barriers.

The council will ensure that it caters for the needs of disabled people Disabled people by hosting any physical engagement events and meetings at accessible venues. For example, when selecting a venue, the council will ensure that it has sufficient provision of accessible parking; vehicle drop-off available close to the building; step-free access and egress; lift access, if required; enough space available inside the meeting area for wheelchair users; and accessible toilets. The council will provide communication support and assistance at public meetings and events as required to meet the needs of any Disabled people in attendance. The council will also take steps to ensure that any online consultation and engagement materials it prepares are provided in an accessible format to ensure that Disabled people can participate, such as visually impaired and deaf people.

The council will follow best practice guidance to ensure that its engagement approach is accessible to Disabled people. This includes guidance such as the Equality and Human Rights Commission’s [‘Engaging with disabled people: An event planning guide’](#) and the Disability Justice Project’s [‘Access to consultations and public engagement’](#) guidance.

Initial design work will be conducted as part of the next stage of project development to inform a Strategic Outline Case (SOC) for a preferred way forward. The council will ensure that any site designs are developed to be accessible to Disabled people that need to use the site. For example, the council will work with technical

consultants to design a design for a new depot that is accessible for employees on site with disabilities. Accessibility guidelines and standards to create designs that are usable by employees with a variety of physical and cognitive disabilities will be stated in any Design Briefs that are developed.

As outlined in a recent blog post by Regen titled "[Why are disabled people more vulnerable to rising energy costs and what should be done about it?](#)", people with disabilities are twice as likely to be living in poverty as non-disabled people. On top of this, approximately a quarter of disabled people live in fuel poverty, with a significant cause of this being the additional financial burdens placed upon disabled people, including, but not limited to:

- Increased mobility costs, from the need for taxis or greater usage of public transport to equipment such as wheelchairs or hoists in the home.
- Increased cost of specialist equipment and/or services, such as home adaptations to install things like wet rooms and continued therapies.
- Increased usage of energy, where people may need to use assistive powered technology, or heat their homes for longer periods of time. For example, disabled people with certain health conditions need to keep warm to manage their pain levels.

The council will consider opportunities to provide a support package tailored for disabled residents using revenues generated by the project. Financial assistance could support household energy efficiency measures, focusing on fuel poor households with disabled residents amongst the first priorities, acknowledging that a significant proportion rely on energy to help manage their conditions and cannot 'cut back'. The Strategic Outline Case will provide an initial high-level review of potential community benefit and financial support opportunities. This will be further assessed in the Outline Business Case stage in consultation with local residents, community groups, and the parish / ward council. The provision of benefits and support will only be possible if the project remains financially viable and generates a profit.

Low-income groups

In accordance with the Equality Act 2010, the council will take steps to ensure that its project engagement and consultation plans and mechanisms are accessible to low-income groups. The council will aim to first identify low-income groups in the local area. It will then aim to anticipate potential barriers low-income groups might face and take steps to address those barriers in devising its engagement plans.

Affordability is vital for engaging with low-income groups; low-income groups with limited financial resources may not, for example, be able to afford to travel to physical engagement events. The council will aim to host physical events in venues that are in close proximity to local low-income groups to reduce the costs of travel to and from events. It will also ensure events are accessible by public transport so that events are accessible to low-income groups without access to a personal vehicle.

Any revenues or savings derived from the Harewood Whin GEP project could be used to support key frontline services, making the city more affordable, and support a good quality of life for residents, particularly low-income groups. There are a range of potential community benefits that this project could provide including the provision of a community benefit fund and/or part community ownership of the asset. The council could consider mechanisms to distribute financial support to low-income households in York that are most in need of financial assistance. To do this effectively, the council will need to identify better methods of identifying marginalised and vulnerable low-income households that need help and that could be supported through revenue generated by the project.

Other

The council will actively work to maximise the local socio-economic benefits of the development of the Harewood Whin Green Energy Park project. It will achieve this by engaging with the local supply chain at an early stage (early market engagement) to understand local capacity and expertise and to retain as much economic benefit as possible in York and the surrounding area.

A techno-economic assessment of the feasibility and viability of a longlist of technical solutions that could be developed on-site (i.e., hydrogen electrolyzers, solar PV, onshore wind etc.) will be undertaken during the next stage of the project. Any health impacts associated with the proposed Green Energy Park installation will be

identified and assessed as part of an Environmental Impact Assessment (during a later stage of project development to inform a planning application).

Impact on human rights

A public right of way (PRoW) is a right by which the public can access along linear routes over land at all times. Although the land may be owned by a private individual, the public have a legal right across that land along a specific route. Public Rights of Way are located towards the eastern and western extents of the Harewood Whin site, allowing for links to Rufforth and Knapton. Whilst it is not expected that the existing PRoW will be impacted by the development, temporary closure of the existing PRoWs may be required to enable the delivery. The council will aim to minimise any disruption / closure by notifying the public of any temporary closure, and directing users to alternative facilities/routes.

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:
- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.	

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
Continue with the proposal	A small number of low impact negative and positive impacts have been identified as a result of the proposal. Effective mitigations have been identified for all negative impacts. Opportunities to enhance positive impacts have also been identified. Therefore, it is recommended that the council 'Continue with the proposal' and ensure that the project team takes steps to implement the mitigation actions identified in Section 5.1.

Step 7 – Summary of agreed actions resulting from the assessment

7.1 What action, by whom, will be undertaken as a result of the impact assessment.			
Impact/issue	Action to be taken	Person responsible	Timescale
Inability to participate in physical / digital engagement events and consultation due to disability.	<p>Develop a project engagement and communications plan that is inclusive and accessible to Disabled people.</p> <p>Identify and anticipate potential barriers Disabled people might face and devise actions to address these barriers.</p>	PM	May 24
Initial site designs may exclude / fail to cater for the needs of disabled employees and visitors.	Integrate accessibility guidelines and standards to create designs that are usable by employees with disabilities into any Design Briefs / Specifications that are developed.	PM	Sep 24
Low-income groups unable to access and participate in in-person or online engagement events.	<p>Develop a project engagement and communications plan that is inclusive and accessible to low-income groups.</p> <p>Identify and anticipate potential barriers low-income groups might face and devise actions to address these barriers.</p>	PM	Sep 24
Provide community benefits such as the provision of a community benefit fund; part community ownership of the	Develop the “commercial case” within the Strategic Outline Case (SOC) to determine potential community benefits and support for low-income households that the project could provide.	PM	Sep 24

asset; and/or targeted support for low-income households.			
Potential to generate local employment opportunities and return benefits to the local economy.	<p>Conduct early market engagement to determine local supply chain capacity to support the project.</p> <p>Develop the “economic case” within the Strategic Outline Case (SOC) to determine local economic benefits associated with the project including generating local employment opportunities.</p>	PM	Sep 24
Potential temporary restrictions to existing Public Rights of Way to facilitate development.	Ensure consultants consider any impact of PRow restrictions and required mitigations by including within specifications / design briefs.	PM	Sep 24

Step 8 - Monitor, review and improve

<p>8. 1</p>	<p>How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?</p>
	<p>The council will consult and liaise with communities of interest throughout the project’s development to ensure that it identifies the impact of project activities on protected characteristics and marginalised groups.</p> <p>The project business case will be developed in accordance with the Green Book guidance, as issued by the HM Treasury, and the “Five Cases” recommended structure. The project development will be undertaken in three stages with the business case approved by the council’s Executive at key decision gateways between each of the stages:</p> <ul style="list-style-type: none"> • Stage 1: Scoping the scheme and preparing the Strategic Outline Case (SOC) • Stage 2: Planning the scheme and preparing the Outline Business Case (OBC) • Stage 3: Procuring the solution and preparing the Full Business Case (FBC) <p>At each decision gateway, the Project Team will prepare an updated Equalities Impact Assessment which will build on this assessment that has been completed for the proposal to initiate the project. The Project Team will capture any impacts of activities on protected characteristics and other marginalised groups within the Equalities Impact Assessment and report on progress to the Project Board. Any lessons learnt will be captured in a “Lessons Learned Log” which will be shared with other service areas and directorates to embed learning across the council.</p>