

Appendix 1: Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	The disposal of HRA leasehold interests in three small sites
Team/ Department	Development
Executive Director	Sarah Cary
Cabinet Member	Leader of the Council
Author(s) name(s) and contact details	Inderjeet Nijhar Inderjeet.Nijhar@enfield.gov.uk
Committee name and date of decision	
Date of EqIA completion	28 05 2023

Date the EqIA was reviewed by the Corporate Strategy Service	12 June 2023
Name of Head of Service responsible for implementing the EqIA actions (if any)	Nnenna Urum-Eke <i>N Urum-Eke</i>
Name of Director who has approved the EqIA	Joanne Drew

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?
What outcomes are you hoping to achieve from this change?
Who will be impacted by the project or change - staff, service users, or the wider community?

The decision will support the Council's commitment in the 30-year HRA Business Plan to generate circa £1 million of income from HRA owned stock, through disposal on an annual basis. By supporting the wider stock investment programme, the marketing and future disposal of this package of three site disposals been market tested with the potential to generate in excess of £1,300,000 of capital receipts.

The three HRA assets were marketed via the GLA small sites portal, by inviting bids from the market for sale in line with the Local Government Act 1972 and s.1 of the Localism Act 2011. Marketing the sites through the portal, allowed fair and equal access to potential small and SME builders, Community Land Trust groups and residents.

It is envisaged that a potential of over 14 new homes can be built on the sites across three wards being: Ponders End, Southgate and Grange Park, providing much needed additional housing for residents in the borough. On one of the sites attempts have been made to engage with the deceased leaseholders Estate and family and then steps taken to provide information to all during the bidding process. The garage in question was taken out from any potential sale or redevelopment planning. The successful bidders will be required to open a dialogue with the leaseholders' or their representatives on any future development plans. All three HRA sites are vacant or derelict former garage sites. No displacement of residents will take place.

The income generated from the future disposal will be utilised to improve the quality and safety of existing homes and assist the development of new high quality and safe housing within the borough. This will contribute to the creation and sustainability of thriving neighbourhoods and places. It will help contribute in alleviation some of the increasing pressure on temporary accommodation across Enfield. It will also provide homes in areas which people desire to live, thus contributing to the building of strong, sustainable communities.

Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Detailed information and guidance on how to carry out an Equality Impact Assessment is available [here](#). (link to guidance document once approved)

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

The three sites are vacant or derelict former garage sites which have not been in use for at least 18- 24 months. The sites were marketed for sale on long leasehold basis, with the Council retaining freehold ownership. Each site has sperate and independent access to the site from the surrounding residential areas.

Data from interim borough Ward profiles 2022 indicate that there are higher numbers of under 18's within Ponders End than the borough average and as compared to Southgate and Grange Park wards, which have higher numbers of residents aged 35 - 75 years) where the remaining sites are located.

Once the marketed site is sold and prepared for redevelopment, the new owners will need to ensure that, design, planning and construction takes account of design codes, space planning standards, planning and other regulations to ensure that the sites provide a wide a mix as possible of house sizes, types and tenures to suit residents of all age groups.

Any construction management plan (CMP) required by the Local Planning Authority(LPA) will need to address any issues that will significantly impact age groups and provide mitigation measures, which are then approved by the LPA.

It will also need to outline how issues such as noise will be dealt with which may affect older (65+) and very young (under 5's) residents during the construction phase. Also, issues such as how site access and egress will be achieved to ensure any construction traffic to and from the site is safely separated from residents living or working adjacent to the sites.

It is envisaged that the decision will have a positive differential impact on a wide range of age groups.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

Health data from the census 2011 indicates that across the three wards the percentage of residents with 'long-term health conditions or disability', ranging between 14.4% to 15.2% (Grange Park to Ponders End). Compared to the Enfield (15.4%) and England (17.6%) average these three wards fare better.

However, the connection between poor quality housing and substantial impacts on health have long been established. This decision aims to increase the amount of housing within the borough available to residents. Through the sale of the sites for redevelopment, aims to provide additional safe, warm and good quality homes that meet the needs of residents thus helping to significantly improve health outcomes.

The disposal and redevelopment of these sites are not deemed to impact residents who have disabilities.

For the site's redevelopment once sold, the new owners will need to ensure that, design, planning and construction will need to take account of design codes, space planning standards, planning and other regulations to ensure that the sites provide a wide mix of house sizes, types and tenures for all residents. New homes provided and made available to residents should be at a minimum accessible and adaptable or fully wheelchair accessible where sites and associated need make this possible.

Any construction management plan (CMP) required by the Local Planning Authority will need to address any issues that will significantly impact residents with disabilities and provide mitigation measures, which would need to be approved by the LPA.

During the construction phase, noise and air quality (such as dust) may negatively affect some residents with disabilities in the vicinity of the sites. The CMP will need to outline how the management of noise and air quality will be dealt with, as this is a specific section within a CMP. The new owners will need to provide mitigation against these.

It is also expected that surveys will be undertaken of each site to identify any contaminated land or other hazards. If identified, hazards will need to be safely removed or dealt with and contamination will have to be removed from site in a safe and controlled manner in line with statutory requirements. The CMP will also need to outline how issues such as site access and egress will be achieved, to ensure that any construction traffic to and from the site is safely separated from residents living or working adjacent to the sites.

It is envisaged that the decision will have a positive differential impact on residents with disabilities.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

The disposal and redevelopment of these sites are not deemed to impact residents who are proposing to undergo, are undergoing, or have undergone gender reassignment.

During the construction phase, noise and other disturbance will be a disruption to all adjacent residents. Any adverse impact of the construction will not be because of gender reassignment.

The sites once redeveloped would provide a wide mix of house sizes, types and tenures for all residents. It is not foreseen that the completed site development will have a negative impact on residents due to gender reassignment.

It is envisaged therefore that the decision will have a positive differential impact on transgender people.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

The disposal and redevelopment of these sites are not deemed to impact residents who are married or in a civil partnership.

During the construction phase, noise and other disturbance will be a disruption to all adjacent residents. Any adverse impact of the construction will not be because of residents marriage or civil partnership status.

The sites once redeveloped would provide a wide mix of house sizes, types and tenures for all residents. This would give married residents, and those in civil partnership, a flexible choice of accommodation. The redevelopment of these sites are therefore not deemed to negatively impact residents who are married or in a civil partnership.

It is envisaged that the decision will have an overall positive differential impact on those residents that are married or in a civil partnership.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

The disposal and redevelopment of these sites are not deemed to impact residents who are pregnant or who have given birth.

To enable the sites redevelopment once sold, the new owners will need to ensure that, design, planning and construction will need to take account of design codes, space planning standards, planning and other regulations to ensure that the sites provide a wide mix of house sizes, types and tenures for all residents.

Any construction management plan (CMP) required by the Local Planning Authority will need to address any issues that will significantly impact pregnant residents and new born babies and provide mitigation measures, which would need to be approved by the LPA.

During the construction phase, noise and air quality (such as dust) may negatively affect pregnant residents or households with new born babies in the vicinity of the sites. The CMP will need to outline how the management of noise and air quality will be dealt with, as this is a specific section within a CMP. The new owners will need to provide mitigation against these.

It is also expected that surveys will be undertaken of each site to identify any contaminated land or other hazards. If identified, hazards will need to be safely removed or dealt with and contamination will have to be removed from site in a safe and controlled manner in line with statutory requirements. The CMP will also need to outline how issues such as site access and egress will be achieved, to ensure that any construction traffic to and from the site is safely separated from residents living or working adjacent to the sites.

The sites once completed would provide a wide mix of house sizes, types and tenures for all residents. This would give residents that are pregnant or have given birth a flexible choice of accommodation.

It is envisaged that the decision will have an overall positive differential impact on those residents that are pregnant or have given birth.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

Enfield is a diverse borough and data from the 2011 census outlines ethnicity compositions of residents in Enfield composed of 38.3% who are white British, 6.7% who are other white, 19.9% who are black and 10.6% who are Asian. Data at a ward level is not available. The most widely spoken language amongst residents across the three wards is English (67.9% – 89.8%) followed by Turkish (2.8% - 10.1%) in Southgate and Ponders End and Greek (1.5%) in Grange park.

The decision seeks the disposal the sites as marked through the GLA portal. By using the portal it has facilitated fair and equal access to potential small and SME builders, Community Land Trust groups and residents.

During the construction phase, noise and other disturbance will be a disruption to all adjacent residents. Any adverse impact of the construction will not be due to the residents race, colour, ethnicity or national origins.

It is envisaged that the sites once redeveloped would provide a wide mix of house sizes, types and tenures for all residents, increasing the choice of accommodation within the borough.

It is envisaged that the decision will have a positive differential impact on residents regardless of their race, colour, ethnicity or national origins.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

The decision seeks the disposal of the sites as marketed through the GLA portal. By using the portal it will allowed fair and equal access to potential small and SME builders, Community Land Trust groups and residents regardless of faith or belief.

During the construction phase, noise will be a disruption to all adjacent residents. Any adverse impact of the construction will not be due to the residents belief or faith.

It is envisaged that the sites once redeveloped would provide a wide mix of house sizes, types and tenures for all residents, increasing the choice of accommodation within the borough.

It is envisaged that the decision will not have a negative differential impact on residents due to their faith or belief.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

The disposal and redevelopment of these sites are not deemed to impact residents because of their sex.

Any future scheme design is not deemed to impact residents because of their sex.

During the construction phase, noise will be a disruption to all adjacent residents. Any adverse impact of the construction will not be due to the residents sex.

It is envisaged that the sites once redeveloped would provide a wide mix of house sizes, types and tenures for all residents regardless of their sex, increasing the choice of accommodation within the borough.

It is anticipated that the decision will not have a negative differential impact on residents due to their sex.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

The disposal and redevelopment of these sites are not deemed to impact residents because of their sexual orientation.

Any future scheme design is not deemed to impact residents because of their sexual orientation.

During the construction phase, noise amongst others will be a disruption to all adjacent residents. Any adverse impact of the construction will not be due to the residents sexual orientation.

It is envisaged that the sites once redeveloped would provide a wide mix of house sizes, types and tenures for all residents regardless of their sexual orientation, increasing the choice of accommodation within the borough.

It is anticipated that the decision will not have a negative differential impact on residents due to their sexual orientation.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Of the three wards in which the decision is based upon, Ponders End Ward has lower than average numbers of economically active adults with an average (median) household incomes lower than Enfield and London averages. This ward has a high level of deprivation – all of its neighbourhood areas are among the most deprived 30% of neighbourhoods in England. Southgate and Grange Park wards fare better with above average economically active adults with higher than borough and London averages.

Differences are mirrored in terms of fuel poverty with 20.1% of households in Ponder End in fuel poverty compared to Southgate and Grange Park being 11.4% and 9.3% respectively.

The levels of crime are higher in Ponders End ward with 124.7 offences per 1,000 population - higher than both Enfield and London averages. Grange Park has the next highest crime rates of 92.5% followed by 56.6% within Southgate ward.

The disposal and redevelopment of these sites are not deemed to impact residents who are socio-economically disadvantaged.

Once the sites are sold and redeveloped, the new owners will need to ensure that, design, planning and construction will need to take account of design codes, space planning standards, and planning regulations to ensure that the sites provide a wide mix of homes. These new homes are expected to be of good quality, be better thermally insulated, have higher specifications and have improved public spaces and will be additional homes that residents need.

During the construction phase, noise amongst others will be a disruption to all adjacent residents. Any adverse impact of the construction will not be due to the residents who are socio-economically disadvantaged.

In their current condition each site has generated a number of complaints and incidents of anti-social behaviour. It is envisaged that the sites once redeveloped would remove them as a target for anti- social behaviour and any associated crime. The sites will also provide a wide mix of house sizes, types and tenures for all residents, increasing the choice of accommodation within the borough.

It is anticipated that the decision will have an overall positive differential impact on residents who are disadvantaged due to socio economic factors.

Mitigating actions to be taken.

No mitigating actions are deemed necessary.

Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The sites for sale were monitored through the GLA portal. These sites are to be sold on a long leasehold basis through an accompanying standard form of lease provided by the Council. This lease outlines landlord and site leaseholder responsibilities and provides a means to monitor the development of the site from the planning stage to five years post completion of the development. This will be monitored by Housing Development Management Services team, Legal Services and corporate Property Teams, respectively. Discussions will be undertaken with the new site owners to outline how the re-development of the sites will be monitored.

Once the sites are sold and the planning application submitted, members of the public will be able to object to elements of, or all of, the planning submissions. Objections will be recorded, reviewed and assessed, in particular with regard to any potential impact on any of the protected characteristics. If seen as relevant the Local Planning Authority may seek that amendments be made to scheme.

Where new homes built are an affordable product and offered to the Council for nominations, residents allocated to the new homes will be monitored as required by the Council's allocations policy. This will ensure protected characteristics are acceptably represented in the allocations of the new homes.

It is envisaged that where sites are developed for private sale or shared ownership homes the marketing strategy will be devised in such a manner as to appeal to people from the widest possible social, cultural and ethnic backgrounds and other groups of protected characteristics.

Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments