

## 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; and
- 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 e.g. 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

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	Enfield Local Plan – Regulation 19 stage
<b>Team/ Department</b>	Plan Making Team Strategic Planning and Design, Planning Service, Planning and Growth
<b>Executive Director</b>	Perry Scott Executive Director of Environment and Communities
<b>Cabinet Member</b>	Cllr N. Caliskan
<b>Author(s) name(s) and contact details</b>	May Hope <a href="mailto:may.hope@enfield.gov.uk">may.hope@enfield.gov.uk</a> 020 83793552
<b>Committee name and date of decision</b>	Full Council Meeting 6 March 2024

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	
<b>Name of Director who has approved the EqIA</b>	Brett Leahy

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?

The Council's forthcoming Local Plan covering the period between 2019 to 2041, will serve as a comprehensive framework for guiding the development of the borough. Beyond land use planning, it aims to protect and enhance various aspects of life in Enfield, including its culture, community, heritage and character, open spaces, blue and green infrastructure, schools, neighbourhood identity, and businesses.

The Local Plan demonstrates a commitment to equality and inclusivity, with positive impacts identified for the different protected characteristics.

Policies fostering open space and play areas benefit children and younger people, promoting an active and healthy lifestyle. Measures to improve community and social infrastructure, enhance health and wellbeing, and protect open spaces and local shops are particularly advantageous for the elderly population.

Transport policies positively impact various groups, especially those with lower incomes, including young people, older individuals, women and those from BAME backgrounds. Policies ensuring specialist housing, accessible urban design, and disabled parking spaces cater to the needs of disabled residents. For the LGBTQ group, certain policies, such as those related to urban design, contribute positively by promoting safety and accessibility, minimising opportunities for crime and antisocial behaviour.

Policies related to accessibility of transport and housing diversity benefit pregnant women and those on maternity leave. The Community and Social Infrastructure policy has a positive impact on religious groups. The Night-Time economy policy includes measures for access, inclusion and safety, offering protection for vulnerable groups including women, LGBTQ individuals, and religious groups facing higher risks of hate crimes and harassment, such as Muslims.

While acknowledging potential negative impacts on certain protected groups, such as the risk of community facilities being priced out, the plan outlines mitigation measures to address these issues. Post Covid-19, there is a need to balance preserving heritage assets with adapting listed buildings to meet the needs of disabled residents.

This assessment draws insights from the public consultation of the Regulation 18 version of the Plan, informing the forthcoming Regulation 19 version, scheduled for public consultation in March 2024.

This version of the Local Plan marks the Regulation 19 stage, also known as the publication version, representing the second phase in the preparation of a new Local Plan. Within this draft Local Plan, the Council articulates its fresh spatial strategy, vision, and objectives, alongside placemaking strategies, site allocations and strategic and development management-style policies – all designed to implement the spatial strategy.

Upon adoption, the new Local Plan will supersede the current Local Plan, encompassing the Core Strategy (2010), Development Management Document (DMD) (2013), North Circular Road Area Action Plan (2014), North East Enfield Area Action Plan (2016), and Edmonton Leaside Area Action Plan (2020). The aim is to consolidate these components into a singular, comprehensive Local Plan document.

Who will be impacted by the project or change - staff, service users, or the wider community?

Residents, businesses, service users, stakeholders and the wider community.

## 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.
10. Social-economic deprivation

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

“Differential impact” means that people of a particular protected characteristic (e.g. 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.

- Families with children, young individuals residing in Houses in Multiple Occupation (HMOs), and the elderly experience the advantages of Policies DE1: Delivering a well-designed, high quality and resilient environment, DE3: Inclusive design, DE7: Creating liveable, inclusive and quality public realm, DE13: Housing standards and design prioritises amenity preservation.
- The elderly population, often grappling with mobility challenges, finds merit in the accessible design standards outlined in DE3: Inclusive design, DE7: creating liveable, inclusive and quality public realm, and DE13: housing standards and design.
- Policy DE15 (Residential Extensions) positively influences families with young children and the elderly, providing flexibility for home adaptations and creating additional space to accommodate evolving needs.
- Policies promoting the development and provision of affordable housing, such as H2, yield positive outcomes for the predominant age group in Enfield – individuals in their 20s and 30s – by addressing heightened housing demand.
- ENV1 (Environmental Protection) has positive implications for all age brackets, particularly benefiting the elderly, as it ensures that development proposals uphold resident health by preventing detrimental effects on air quality.
- Policy SC2: Protecting and enhancing social and community infrastructure yields positive outcomes across various age groups. Younger residents gain access to educational, training, and social facilities like youth clubs. Similarly, community facilities with good transport links positively impact the elderly.
- Policy CL5: Sport, open space and recreation contribute positively to the physical health, well-being, and development of children and young people.
- PL8: Rural Enfield, BG6: protecting open spaces, BG9: allotments and community food production promote active living and offer essential physical, psychological, and social health benefits for older individuals, families with young children and young individuals.
- Policy SE6: climate change adaptation and managing heat risk positively affects older people with mobility issues, optimising the use of the layout, orientation, materials, technology and design of buildings and spaces to minimise any adverse impacts on internal and external temperature, reflection, overshadowing, micro-climate and wind movement. It requires external and passive shading to form part of proposals to prevent health issues related to dampness, heat, and cold.
- Mixed-use development (H1) has a favourable impact on older people with

mobility challenges, providing diverse facilities in proximity to good transport links.

- Policy E8 supports young individuals entering the workforce by offering training, apprenticeship opportunities, and local employment prospects.
- Transport policies (T1-3) ensure widespread and accessible public transport, encouraging healthier methods like walking and cycling, benefiting the elderly population.

#### **Mitigating actions to be taken**

The Local Plan recognises a deficiency in community facilities (SC1 and SC2). In the ongoing context of post Covid-19, there is a concern that community facilities might be displaced by uses with higher land values, negatively impacting both younger and older residents who depend on them. To address this risk, the Council should maintain regular updates and close monitoring of the Infrastructure Delivery Plan (IDP). This approach will facilitate the ongoing assessment of the current stock of social and community facilities.

Additionally, the Council can use section 106 planning obligations to ensure that proposed developments align with the demand on existing community infrastructure and services.

#### **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.

- Policy H3: housing mix and type positively influences individuals with disabilities by emphasising considerations like wheelchair accessible dwelling standard, 'tenure blind' approach and the necessity for accessible and inclusive designs in developments.
- Policy DE15: residential extensions and design is beneficial for disabled individuals as it permits adaptations to be made to their homes.
- Community facilities that are easily accessible and well-connected positively impact disabled residents, as outlined in SC1 and SC2 (social and community infrastructure).
- DE3: inclusive design has a positive impact on this group by ensuring that all development are designed to be inclusive, providing facilities for children of all abilities.



- DE13: housing standards and design positively affects disabled individuals by stipulating that housing must be designed to be inclusive and accessible to all
- Policy H9 student accommodation has a positive impact on disabled individuals by requiring that 10% of student rooms will be easily adaptable for occupation by wheelchair users from the outset.
- Mixed-use development (H1) brings about positive outcomes for individuals with mobility issues by offering a diverse range of facilities in close proximity, particularly in areas well-connected by good transport links.
- Local Shops and Services (Policies TC1 and TC2) prove advantageous for people with mobility issues as they provide essential amenities close to home.
- Evening and Night-Time Economy (E9) positively impacts disabled individuals by supporting developments that enhance access for all users, including improved travel to and from venues.
- Transport policies (T1-3) ensuring widespread and accessible public transport are advantageous for disabled residents.

#### **Mitigating actions to be taken**

Policy DE10 conserving and enhancing heritage assets requires that proposals must preserve features contributing to the Heritage Asset or Historic Environment's significance and character. While there is a potential clash between this aspect of the policy and the need for adaptations like ramps in Listed Buildings to accommodate disabled individuals, the likelihood is low. In such cases, council officers handling planning applications can exercise discretion.

The Local Plan recognises a deficiency in community facilities. In the current post Covid-19 context, there is a risk of these facilities being overshadowed by other higher land value uses, adversely affecting disabled residents who rely on them. To mitigate this, the Council should regularly update and closely monitor the Infrastructure Delivery Plan (IDP) to track the current stock of social and community facilities. Additionally, the Council can utilise section 106 planning obligations to ensure proposed developments meet the demand for existing community infrastructure and services.

### 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.

- Policies PL1: Enfield Town, PL2: Southbury, BG13: blue and green infrastructure plans, DE6: tall buildings, DE7: creating liveable, inclusive and quality public realm, DE9: shopfronts and advertisement, TC2: encouraging vibrant and resilient town centres, T1-3 – all contributes positively to the well-being of transgender individuals who face higher levels of discrimination. By emphasising safety and accessibility, the policies in general urges developers to minimise opportunities for crime and antisocial behaviour, fostering a safer environment for transgender people within the borough.
- Night-Time Economy (E10) further benefits vulnerable groups by requiring access, inclusion, and safety measures, offering protection to marginalised communities, including the LGBTQ community.
- SC2 Social and Community Infrastructure plays a crucial role in supporting transgender individuals by advocating for inclusive social and community facilities, ensuring their needs are addressed in public spaces.

### Mitigating actions to be taken

To address the elevated risk of hate crimes, harassment, and attacks faced by certain groups, particularly the LGBTQ community, the Council should work with developers from the outset. It is essential to incorporate safety and security measures at the early stages of the design process and ensure their consistent implementation.

### 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.

No perceived impact. The policies in the proposed Local Plan aim for overall improvements in the borough from which all people should benefit, regardless of relationship or marital status.

**Mitigating actions to be taken**

None. Those within this category are not considered to be negatively affected by the policies within the Local Plan.

**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.

- Policies such as DE13: housing standards and design and DE15: residential extensions and outbuildings have a positive influence on pregnant women or those on maternity leave by permitting home extensions to accommodate growing families.
- Additionally, the Housing Mix and Type policy (H3) is advantageous for individuals in this category, urging developers to offer a variety of home sizes, catering to the needs of families requiring more extensive living spaces.
- The presence of Local Shops and Services (TC1) proves beneficial to pregnant women, offering convenience and proximity, eliminating the need for extensive travel.

**Mitigating actions to be taken**

None. Those within this category are not considered to be negatively affected by the policies within the Local Plan.

**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.

- Policies promoting the creation of affordable housing, exemplified by H2: affordable housing have a positive influence on individuals from BAME backgrounds, who typically experience lower incomes.
- Furthermore, the Social and Community Infrastructure policy (SC2) aims to improve community infrastructure, accommodating diverse needs among different ethnic groups and ensuring adequate service provision.
- CL5: sport, open space and recreation encourages active living, offering significant health benefits for BAME individuals, who may face worse health outcomes than their white counterparts.
- The Housing Mix and Type policy (H3) positively impacts BAME communities by encouraging housing developments to provide a variety of dwelling sizes, recognising that extended family units, common among Asian families, may require more space.

- Policy H10: Traveller Accommodation promotes Traveller sites in the borough, ensuring accommodation needs are met and identifying additional facilities if necessary.
- BAME individuals stand to benefit from training, apprenticeship opportunities, and local employment opportunities (E9: Local jobs, skills and local procurement).
- Moreover, the Night-Time Economy policy (E10) positively affects vulnerable groups, including people from BAME backgrounds, by requiring measures for access, inclusion, and safety.

**Mitigating actions to be taken**

There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including ethnic minorities. To mitigate this issue, the Council should work with developers from the outset to ensure that they include safety and security measures early in the design process and that these are followed through.

**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 Social and Community Infrastructure policy (SC2) aims to improve community facilities, encompassing religious meeting places, thereby generating a positive impact across various faith groups.
- Similarly, the Night-Time Economy policy (E10) positively influences vulnerable groups by mandating measures for access, inclusion, and safety, thereby offering protection to groups such as religious communities.

**Mitigating actions to be taken**

The Local Plan recognises a deficiency in community facilities. In the current post Covid-19 context, there is a risk of these facilities being overshadowed by other higher land value uses, adversely affecting disabled residents who rely on them. To mitigate this, the Council should regularly update and closely monitor the Infrastructure Delivery Plan (IDP) to track the current stock of social and community facilities. Additionally, the Council can utilise section 106 planning obligations to ensure proposed developments meet the demand for existing community infrastructure and services.

**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.

- Women, often shouldering caring responsibilities for children, stand to benefit from the accessibility of developments and well-connected local transport links (SS1: Spatial Strategy).
- Policy E9: local jobs, skills and local procurement supports local employment, positively impacting women who may need part-time work close to home due to caring responsibilities.
- Additionally, Local Shops and Services (TC1) prove advantageous to women with childcare duties, offering convenience and proximity.

- Night-Time Economy (E10) contributes positively to vulnerable groups, including women, by stipulating access, inclusion, and safety measures.
- Transport policies (T1-3) ensuring widespread and accessible public transport have a positive impact on women with childcare responsibilities, given their reliance on public transportation.

**Mitigating actions to be taken**

Certain groups, particularly women, face elevated risks of hate crimes, harassment, and attacks. The Night-Time Economy policy (E10) lacks a specific requirement for developments to contribute to the safety of these vulnerable groups, such as incorporating security features, well-lit walking routes, and robust surveillance.

To address this concern, the Council should work with developers at the outset to ensure the early inclusion of safety and security measures in the design process, emphasising their consistent implementation.

### **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 Design-Led Approach (SS1 and DE1) holds a positive influence on the well-being of the individuals who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual - who often faces disproportionate discrimination. This policy advocates for safety and accessibility while urging developers to minimise opportunities for crime and antisocial behaviour. Consequently, it contributes to creating a safer environment for individuals within the borough.

Additionally, the Night-Time Economy policy (E10) plays a beneficial role for vulnerable groups, including the community who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual, by mandating access, inclusion, and safety measures. This requirement serves to safeguard and protect these vulnerable groups, fostering a more secure and inclusive borough environment.

### **Mitigating actions to be taken**

Certain groups, particularly 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 – face elevated risks of hate crimes, harassment, and attacks. The Night-Time Economy policy (E10) lacks a specific requirement for developments to contribute to the safety of these vulnerable groups, such as incorporating security features, well-lit walking routes, and robust surveillance.

To address this concern, the Council should work with developers at the outset to ensure the early inclusion of safety and security measures in the design process, emphasising their consistent implementation.

### **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.

- Policy SC2 provide convenient and equitable access to innovative models of local healthcare services and social infrastructure
- Policy H2 increase in net affordable housing will enable existing residents to live close to family, friends and work.

**Mitigating actions to be taken.**

The Council will work with communities, landowners and developers to ensure, wherever possible, homes are marketed to people who live and work in the borough or surrounding areas of London.

The Council will aim to provide and improve existing social, green and transport infrastructure.

## 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?		
Action	By when?	By who?
Examination of the Local Plan	2024	Strategic Planning and Design
<p>To produce an up to date Authority Monitoring Report (AMR) of the adopted Local Plan and keep it under review annually to ensure the local plan policies are meeting their objectives. The methods used to assess the success of the local plan policies will include monitoring development pipelines, built out rates and infrastructure projects. Whilst the AMR does not solely (and explicitly) monitor the equalities impact of the local plan, the policies proposed in the Draft Local Plan aim for overall improvements in the Borough from which all people should benefit.</p> <p>It is requirement for a local authority to produce an Authority Monitoring Report (Section 113 of the Localism Act 2011). This amends Section 35 of the 2004 Planning and Compulsory Purchase Act which previously required Local Planning Authorities to submit an Annual Monitoring Report to the Secretary of State. The Localism Act removes this requirement but retains the need for local authorities to produce a monitoring report for public consumption.</p> <p>The draft Local Plan includes Local Plan Key Performance Indicators. The key indicators will be monitored along with commentary on other key social, economic and environmental changes that impact on plan delivery and the delivery context as part of the authorities.</p>	Ongoing	Planning Policy Officer

## 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
Striking a balance between safeguarding historical features and ensuring accessibility for individuals with disabilities	Evaluate the impact of Policy DE10 (conserving and enhancing heritage assets) considering the potential need for adaptations to accommodate the requirements of disabled individuals.  Ensure that a balanced approach is taken to preserve historical features while addressing accessibility needs for people with disabilities.	Strategic Planning and Design	On-going		On-going
Update the policy to require development includes access, inclusion and safety measures	In the context of the Night-Time Economy, the Council should update the policy to require development includes access, inclusion and safety measures. This is important to ensure the safety of Women, LGBTQ, and religious groups e.g., Muslims who are at a higher risk of hate crimes and harassment.	Strategic Planning and Design	Before the plan goes to Full Council approval for consultation	Covered within the local plan budget	24/25
Ensure the Infrastructure Delivery Plan is regularly updated and monitored	The Council to ensure the Infrastructure Delivery Plan is regularly updated and monitored closely to keep track of current stock of social and community facilities.	Strategic Planning and Design	Ongoing	Covered within the local plan budget	24/25

