

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 and 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.

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 1 – Equality Analysis Details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Draft Enfield Local Plan 2039 – Regulation 18
Lead officer(s) name(s) and contact details	Hanan Osman- Senior Planning Officer
Team/ Department	Plan Making Team Place Department
Executive Director	Sarah Cary
Cabinet Member	Cllr Caliskan
Date of EqIA completion	12 April 2021

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?

Describe the change, why it is needed, what is the objective of the change and what is the possible impact of the change:

This Equalities Impact Assessment/Analysis (EqIA) sought to ensure that the document production and consultation for the New Local Plan promotes equal opportunities. Currently planning applications in Enfield are determined using Development Management Document (2014), the Core Strategy (2010) and the Area Action Plan policies. With references to national planning legislation and statutory policies, including the Government's National Planning Policy Framework and relevant policies in the London Plan.

The draft Enfield Local Plan (ELP) provides a spatial framework to guide the future development of the borough for the next 15 years, up to 2039. It is a

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strategic document providing the broad strategy for the scale and distribution of development and the provision of supporting infrastructure. It contains core policies for guiding patterns of development. It seeks to address priorities such as housing needs, increasing the supply of affordable housing, creating employment, improving public health, town centres, safety and encouraging design quality. Once adopted, the Enfield Local Plan will update and amalgamate the existing Development Management Document (2014), the Core Strategy (2010) and the Area Action Plan policies, into one document which also includes a number of new policies.

The draft ELP sets out the council's vision for the borough and a spatial planning strategy for the period 2018-2039. Subsequent to the Examination in Public and formal adoption, the ELP will become the borough's principal planning policy document. It will provide a detailed criteria and standard based policies by which planning applications will be determined and will be a key vehicle in delivering the vision and objectives for Enfield, shaping development around the borough over the long term. Moreover, the Local Plan must have regard to national planning legislation and statutory policies, including the government's National Planning Policy Framework and must also be in general conformity with the London Plan.

The council is committed to treating everyone fairly and justly, whatever their race or background and wants to ensure that everyone gets an opportunity to be involved in the planning process. The main reason of the Equality Impact Assessment (EqIA) is to assess how the policies and proposals of the emerging Local Plan will impact on, or affect, different groups or communities. It helps the council to determine whether the impacts are positive, negative or unlikely to have a significant impact on each of the protected characteristics groups. The EqIA reflects the Public Sector Equality Duty (PSED) which contains three areas in which public bodies must show compliance. The duty states that a public authority must, in the exercise of its functions, have due regards to the need to:

1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
2. Advance equality of opportunity between persons who share a relevant protected characteristics and persons who do not share it; and
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The equality duty is a continuing duty and consideration of equality impacts has taken place throughout the preparation and publication of the Local Plan.

The impact of the changes will be reported in the Integrated Impact Assessment to support the ELP.

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, where possible, 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.

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.

A key aspect of the draft New Local Plan is to strengthen the relationship with communities across a range of age groups in Enfield. This is to achieve fairness for all and a sustainability growth within the context of providing the appropriate level of development and the provision of supporting infrastructure.

This predominantly has a positive effect on younger and older age groups where the creation of a safer environments in which to walk, play and cycle which are less polluted. It also seeks to promote new development and public realm interventions are high quality and design led in their approach, taking careful account of urban context and reinforcing local distinctiveness.

Enfield's population as at mid-2019 is estimated to be 333,794 with around 51.1% of the population female and males making up 48.9% of the population. There are more males than females in all ages up to 29 years. There are significantly more women than men over 80. Enfield has a higher number of young people aged 0-19 than the London average, and a higher proportion of adults aged 20-44 than the England average, but much lower than the London average.

The very young and older age groups can be more difficult to consult. Both groups may have limited skill and ability in respect of internet access and those methods of consultation are likely to benefit the most.

Mitigating actions to be taken

The council has produced a Statement of Community Involvement (SCI) 2021 that sets out the principles to be applied in involving the community in the preparation of the ELP.

The involvement of the community is also subject to the Town and Country Planning (Local Planning) (England) Regulations 2012.

Specific consultation to be targeted at younger people and older people during the experimental phase. They are hard to reach groups but are hypothesised to obtain significant benefits.

Monitor consultation responses to identify the age distribution and alignment with the local population.

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.

The ELP will consider the needs of disabled people and residents with long term illnesses across the borough as a whole. Through inclusive design with a type of new housing provided will need to account for this and ensure that wheelchair accessible homes are provided with easy access to car parking spaces. The affordability of new housing also needs to be considered for disabled people as the earning potential of some residents may be reduced if they are unable to work due to their disability.

The ELP will account for the needs of disabled residents when considering improvements to pedestrian links in the area. Wheelchair accessible venues will be selected for consultation events and meetings with the local community.

There are several policies in the ELP around community facilities to ensure that there is adequate healthcare provision appropriate to the need and location and will have a positive impact on all equality groups in the area, particularly the elderly and disabled groups who require good access to primary care services.

The assessment of equality impacts will be available as part of the Integrated Impact Assessment to support the ELP.

Mitigating actions to be taken

For public consultations, we will consider the needs of people with various physical disabilities, visual impairments and the deaf community. Whilst undertaking the necessary measures and precaution in response the impact of Global Pandemics such as Covid-19 on the planning process.

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.

It is believed at this time that no aspect of the ELP is likely to have a differential impact on grounds of gender reassignment.

The assessment of equality impacts will be available as part of the Integrated Impact Assessment to support the ELP.

Mitigating actions to be taken

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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

It is believed at this time that no aspect of ELP is likely to have a differential impact on grounds of Marriage and Civil partnership.

The assessment of equality impacts will be available as part of the Integrated Impact Assessment to support the ELP.

Mitigating actions to be taken
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Pregnancy and maternity
<p>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.</p>
<p>Will this change to service/policy/budget have a differential impact [positive or negative] on pregnancy and maternity?</p>
<p>Please provide evidence to explain why this group may be particularly affected</p>
<p>The ELP contains policies on ensuring design quality of new development and tall buildings for example are of relevance where they require all new development to respect the principles of accessible and inclusive design. This is of high relevance to, and will have a high impact upon, people who are less mobile, including the elderly, disabled people and pregnant mothers and people with very young children.</p> <p>Sustainable transport policies seeking to improve public transport in the borough will benefit all people, but especially people who are unable to drive and are comparatively less mobile such as the young, the elderly, the disabled and potentially pregnant women and those with very young children.</p> <p>Policies on improving the opportunities for walking and cycling is of high relevance to and will have a positive impact on people who are unable to drive and are comparatively less mobile such as the young, the elderly, the disabled and potentially pregnant women and those with very young children.</p> <p>The assessment of equality impacts will be available as part of the Integrated Impact Assessment to support the ELP.</p>
Mitigating actions to be taken
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Race
<p>This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.</p>
<p>Will this change to service/policy/budget have a differential impact [positive or negative] on people of a certain race?</p>
<p>Please provide evidence to explain why this group may be particularly affected</p>

The London borough of Enfield is very diverse. In the 2011 census 40.5% of respondents identified themselves as white British, with the next largest categories identified as white other (18.2%) and Black African (9%). The white British category is lower than in both London as a whole (44.9%) and well below the level in England (79.8%)

Ethnicity Research from 2019 suggests that 35.32% of Enfield residents are from white British backgrounds, 23% from white other and 18% from black groups. Polish, Turkish, Greek, Somali, Bengali and Gajarati are the main languages otherwise spoken. The representation by race are not well studied and it is unclear if there will be a positive or negative impact based on this characteristic.

The policy on gypsy and travellers accommodation is of high relevance and is likely to impact upon the protected characteristic of race. The policy focuses on the potential to increase capacity in the borough.

A full assessment on race will form part of the EqIA as part of the Integrated Impact Assessment to support the ELP.

Mitigating actions to be taken

Consideration should be given to translated versions of the measures for download on the Enfield website.

Monitor demographic responses to consultation to ensure adequate representation of different ethnic groups.

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.

There are no impacts on religion and belief that have been identified at this stage.

A full assessment on religion and belief will form part of the EqIA as part of the Integrated Impact Assessment to support the ELP.

Mitigating actions to be taken

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Sex

Sex refers to whether you are a man or woman.

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

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

It is believed at this time that no aspect of this ELP is likely to have a differential impact on grounds of men or women.

A full assessment on sex will form part of the EqIA as part of the Integrated Impact Assessment to support the ELP.

Mitigating actions to be taken

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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.

It is believed at this time that no aspect of the ELP is likely to have a differential impact on grounds of Sexual Orientation.

A full assessment on sexual orientation will form part of the EqIA as part of the Integrated Impact Assessment to support the ELP.

Mitigating actions to be taken
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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.

The ELP recognises the diversity within the communities in the borough and the need to reduce inequalities that exist and deliver new housing and jobs. The approach is closely linked to the priorities highlighted in Enfield Council Plan. The cumulative impact of the ELP policies will ensure equitable outcomes for people on low incomes in the community through coordinated delivery of social, economic, educational, physical and environmental infrastructure.

The policy approach of the ELP is inclusive of all communities and will have positive impacts in addressing blight and poor environment in parallel with tackling deprivation issues in the deprived areas. It will support the delivery of the Local Plan documents and will allow comprehensive delivery of new development that meets the needs of the demographic in the deprived areas of the borough.

Improvements in educational infrastructure, creating a positive learning environment and improving the overall quality of life in the borough will help achieve higher educational attainment levels.

There are policies for economy, town centres and shopping recognising that the future economic prosperity and diversity of the borough is vital. By applying a policy approach of safeguarding existing employment land and allowing flexibility of potential opportunity sites for development, it will enable a strong economy to develop that can provide employment opportunities for all sections of the community including all equalities groups.

The assessment of equality impacts will be available as part of the Integrated Impact Assessment to support the ELP.

Mitigating actions to be taken.
- Monitor and review feedback for unforeseen impact.

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 effectiveness of the Council's approach to consultation in planning will be monitored through the Local Plan Monitoring Process. Throughout the preparation of the Local Plan an Equal Opportunities Monitoring form is produced for all Local Plan document consultations in both electronic and paper format. The number of returns to equalities monitoring forms is average and improvement to increasing returns and monitoring is being explored through each individual consultation. The number of monitoring form returns in the last financial year is not sufficient to conclude the impact of the service on the individual identified groups. As best practice, an EqIA is also prepared to accompany the production of new Local Plan and Supplementary Planning Documents. The general effectiveness of planning policies within the Local Plan is monitored yearly through the authorities Monitoring Report.

The Council publishes Authority Monitoring Reports (as required under Section 113 of the Localism Act, 2011) on a yearly basis. The Development management section also carries out regular monitoring of how effective a service it delivers in dealing with applications and appeals through the statutory processes.

The EQIA will continue to be updated as issues of equality or potential inequality arise.

The council will take the following actions to promote its equalities duties:

- it will monitor the implementation of the Local Plan policies on an ongoing basis. Potential issues that may adversely impact on the protected characteristics will be reported in the council's Monitoring Reports. The relevant Local Plan policies may then be amended accordingly, through a statutory review process, to help resolve these issues;
- it will undertake public consultation on the Local Plan and associated documents, including the EQIA. The current consultation will provide people with an opportunity to comment on the plan
- In addition, people may comment on the EQIA and on the supporting sustainability appraisal; and
- it will monitor the development of equalities legislation and associated case law to help ensure that the Local Plan remains legally compliant.

SECTION 5 – Action Plan for Mitigating Actions.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
The draft New Local Plan (Regulation 18 Issues and Options) is subject to a six week consultation 21 June to 2 August.	The EqIA will be reviewed and updated during preparation of the Regulation 19 Local Plan Preferred Option to respond to issues raised during consultation on the Regulation 18 Issues and Options.	Plan Making team	Summer 2021	Officer time	The EqIA will take account of changes to the Local Plan.
Older and younger people may be harder to reach via engagement and consultation methods.	Consider how these groups could be specifically targeted for engagement.	Plan Making team	During consultation phase.	Officer time	
Unforeseen concerns raised during the six week consultation 18 June to 30 July	Monitor all incoming communication for equality impact	Plan Making team	During consultation phase.	Officer time	
It will be important to review and monitor the impact of New Local Plan on equalities issues once it is adopted.	To report on any equality matters raised, through individual Local Plan document consultations.	Plan Making team	202X onwards	Officer time.	The Council will ensure that Community Involvement in the preparation of the Local Plan and planning applications is in accordance with its policies on fairness and equalities.