

**London Borough of Enfield
Equalities Board**

1 December 2021

**Subject: Enfield Local Plan – Main Issues and Preferred
Approaches Regulation 18 consultation**

Cabinet Member: Cllr Caliskan

Executive Director: Sarah Cary

Key Decision

Purpose of Report

1. The council is in the process of preparing a new local plan for Enfield. This report and the presentation attached, provides an update to the Board on the equalities impact of the draft Local Plan (ELP).

Proposal and Reason for Proposal(s)

2. It is a statutory requirement for all Councils to prepare a Local Plan and ensure that it is up to date. Enfield's current Local Plan includes a Core Strategy published in 2010 and a Development Management Document published in 2014; as both are older than five years they are required to be reviewed.
3. By approving the Reg 18 Draft Enfield Local Plan for consultation the Council will be taking the next step in ensuring it has an adopted statutory plan in place by 2023/24 to help guide the development that the borough requires to 2039 and beyond to meet its growth needs.
4. Preparing a new Local Plan provides the Council with an opportunity to set out a positive vision for growth, ensuring that appropriate facilities and infrastructure are provided for future residents.

Relevance to the Council Plan

5. The draft ELP sets out how the spatial development needs of the borough will be delivered to 2039, and beyond. It is a vitally important tool for helping the council deliver its corporate priorities and delivering the spatial elements of the council's Corporate Plan.
6. The draft local plan has been prepared in light of the corporate priorities and embeds these in its spatial vision, objectives and policies. A key theme of the plan is providing a lifetime of opportunities for all and levelling up between eastern and western parts of the borough. The draft plan focusses on delivering high quality new homes at scale, ensuring good growth and delivery of safe and healthy places. The vision and policies for the economy form a key part plan and seek to create new and a more diverse range of

employment opportunities, as well as improving the quality of the existing employment spaces of the borough.

7. The draft ELP contains a vision which extends from the Corporate Plan: By 2039 Enfield will be a place of growing opportunity for future generations, the green lung of London where new homes and jobs help all our communities thrive.

Background

8. The adopted local plan comprises a range of planning documents including the Core Strategy and Development Management Plan, 3x Area Action Plans, Local Development Scheme, Community Infrastructure Levy and Supplementary Planning Documents. Together these documents support the delivery of sustainable development across the borough.
9. It is a statutory requirement for all Councils to prepare a Local Plan and ensure that it is up to date. Enfield's current Local Plan includes a Core Strategy published in 2010 and a Development Management Document published in 2014; as both are older than five years they are required to be reviewed.
10. A new Local Plan is being prepared to guide growth and development in the longer term. It is a vitally important tool for helping the council deliver its corporate priorities and delivering the spatial elements of the council's corporate plan.
11. The new Local Plan provides the council's vision, objectives and spatial strategy for the period up to 2039 and beyond. It contains strategic development policies (SP) and Development Management policies (DM), site specific land use allocations and associated policies and a Local Plan policies map. Once adopted, the Local Plan will replace the previously adopted Local Plans.
12. The Local Plan outlines to users the scale and distribution of future development, growth and change to 2039. It also ensures that the borough has an up-to-date development plan in line with Government requirements. An Equality Impact Assessment for this new Local Plan was undertaken as part of the plan preparation process between 2020 and 2021, and is now being reviewed again to ensure it reflects the most up to date information, the progress of the Local Plan and ensure that on adoption of the Local Plan any potential impacts have been taken into account.
13. The borough continues to work in partnership with a range of other public and private organisations and agencies to progress, deliver and monitor the Local Plan. These include the Greater London Authority and Transport for London, neighbouring authorities (London boroughs and those outside), developers/landowners and their agents, Essex and Hertfordshire county councils, utility providers and service providers.
14. The Local Plan integrates with other policies and strategies of the council and, Clinical Commissioning Group and other organisations. These include Corporate Plan, Housing Strategies, Economic Development Strategy, Cultural Strategy and Climate Action Plan. The Local Plan will have a key role

in helping to deliver objectives in these strategies especially where they spatially relate to the use and development of land.

15. In order to achieve the greatest sustainable development benefits for the area, the Local Plan seeks to deliver the homes, jobs, shops, services and infrastructure it needs, whilst conserving/protecting its historic environment and local characteristics, maintaining safe and inclusive communities and adapting to climate change.
16. The Local Plan has also been subject to Integrated Impact Assessment (IIA), which incorporates: Sustainability Appraisal/Strategic Environmental Assessment, Health Impact Assessment, Equalities Impact Assessment, Community Safety Impact Assessment and a Habitats Regulation Assessment to assess its environmental, social and economic performance at each stage of plan making. It has also been informed and shaped by a number of public and stakeholder consultations which have been carried out in accordance with the Council's SCI. Each stage of the Local Plan will also be accompanied by an IIA.
17. The Council's Authority Monitoring Report will continue to measure the progress of the Local Plan implementation. Reports will also be presented, when appropriate, to Council Committees such as Supplementary Planning Documents and masterplans.

Main Considerations for the Council

18. The impact of the plan its proposals and policies have been assessed on different protected groups.

Race

19. Proposals and policies in the Local Plan seeks to support sustainable development and communities in line with Government guidance. S106 and Community Infrastructure Levy (CIL) funding will continue to support growth and sustainable development through the provision of new/ improved infrastructure. This will benefit all groups. The Local Plan seeks to improve access to services and facilities such as housing, jobs, schools and shops. This approach will benefit people of different races or ethnic groups. Throughout the Local Plan process the community at large are invited to have their say on the plan and its proposals.

Age

20. The direction and ambition of the draft Local Plan strives to focus development in locations which are accessible by public transport and non-car modes to make the borough more accessible to people of all ages. Proposals and policies in the ELP work to provide better access to community and recreational facilities on a site and in adjoining areas.
21. Several of the policies throughout Chapter 8 specifically deals with housing in the draft ELP explicitly address the diverse needs of the different age groups in borough
22. In the preparation of the draft Local Plan, the Council has considered the housing requirements of many different age groups including: students, young

people, families, adults, elderly people, etc.). Chapter 8 includes specific policies relating to student accommodation (H9), family-sized housing (H3), and supported and specialised housing (H5), build to rent (H7) and community led housing (H6) - as they relate specifically to different, unique age groups. These policies are considered to have positive impacts upon the cohorts to which they are relevant, without costing others or creating a negative effect on other demographic groups as they all strive to contribute towards establishing a mixed and balanced community (especially policies H4, H6, and H11) which facilitates a healthy environment for the success of all people at all stages of their lives.

23. Whilst policies H8: purpose built shared housing include restrictions upon free-market proliferation of specific housing types, it is not considered that these restrictions negatively impact the relevant target groups as the aim and function of the restrictions is to ensure mixed and balanced communities in which all cohorts of age groups benefit from a healthier social mix. The potential self-segregation/selection of communities by age group through the forces of market demand is considered to be more likely to have a negative effect on specific age groups than ensuring their healthy mix throughout the city as a whole.
24. Chapter 13 focuses on movement and connectivity, and specifically works (through policies T1 and T2) to facilitate sustainable transport modes as alternatives to private car use; which will make the borough more accessible to people of all ages.
25. Further policies in Chapters 5 and 6 of the draft Local Plan (which relates to social infrastructure i.e. community facilities and blue and green infrastructure) are specifically targeted at protecting, retaining, and encouraging facilities needed for general health and wellbeing of all types of age demographics (policies SC1 and 2, policies BG1 to 9). Policies specifically relating infrastructure and culture, leisure and recreational facilities (D1 to 2 and CL1 to 6), will seek to ensure that the relevant services and infrastructure are available to support development and are delivered at a timely stage.
26. Overall, the effect of the draft Local Plan on the age equality strand is considered to be positive.

Disability

27. The direction and ambition of the draft Local Plan strives to focus development in locations which are accessible by public transport and non-car modes to make the city more accessible to people of all abilities. The document works to provide better access to community and recreational facilities on a site and in adjoining areas.
28. In the preparation of the draft Local Plan, the Council has considered the need to ensure that services and facilities are accessible to all and the need for accessible and adaptable dwellings. Chapter 7 on Design and Character includes a policy requiring ten per cent of all new residential development should be wheelchair accessible or easily adapted for wheelchair users to meet national standards for accessibility and adaptability (Category M4(2) of Building Regulations). The building as a whole should be designed to be

accessible for wheelchair users. In addition, Policy H3 on housing mix and type requires at least 10 per cent of all new dwellings should be built to M4(3) wheelchair accessible dwelling standard in accordance with Building Regulations. It is considered that these policies will result in some positive effects for housing quality for people with disabilities.

29. Furthermore, Chapter 13 focuses on movement and connectivity (policies T1 and T2) and specifically works to support a range of sustainable transport modes, which will provide residents and users of Enfield with a greater range of movement options and make the borough more accessible to people of all abilities.
30. Overall, the effect of the draft Local Plan on the disability equality strand is considered to be positive.

Gender reassignment, sex and sexual orientation, pregnancy and maternity, marriage and civil and partnership

31. The Local Plan seeks to support sustainable development and communities in line with Government guidance.
32. Proposals and policies in the Local Plan seeks to improve access to services and facilities such as housing, jobs, schools and shops. This will benefit lesbian, gay, bisexual and heterosexual people, men and women, pregnant women and new and breastfeeding mums.
33. Throughout the Local Plan process the community at large are invited to have their say on the plan and its proposals.

Consideration of measures

34. An EqIA was completed of all the policy options coming out of the draft ELP. This assessment identified all possible effects and implications of the potential policy options. The findings of this assessments were then used to inform choice of policy approaches, and to refine and develop the policy options and approaches into fully fleshed draft policies in the consultation version. Where potential adverse impacts were raised and/or identified, policy approaches were changed or adapted, or measures of mitigation were internalised into the final written policy.
35. Additionally, the draft proposals and policies of the ELP have been informed by the separate Sustainability Appraisal of the Local Plan. As a requirement through the Environmental Assessment of Plans and Programmes regulations (2004) and National Planning Policy Framework (NPPF), all Local Plans are subject to a Sustainability Appraisal. For the ELP, the council undertook an Integrated Impact Assessment comprising a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA), Community Safety Impact Assessment (CSIA) and Habitats Regulations Assessment (HRA). The IIA considers the social, economic, and environmental effects of the Local Plan, and ensures that, as far as possible, it accords with the principles of 'sustainable development'. A number of the sustainability objectives relate to relevant social issues, such as meeting local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home; improving health and well-being and reducing inequalities in health; reducing

poverty and social exclusion; developing opportunities for everyone to acquire the skills needed to find and remain in work; reducing crime and the fear of crime; and creating and sustaining vibrant communities.

36. The draft policies included in the consultation version (Reg-18) are present after having due regard, as required by section 149 of the 2010 Equality Act, to the need to eliminate discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The policies will be refined following consultation to benefit all characteristics.

Conclusions

37. The Local Plan will seek to deliver specific types of development and at specific locations. As such, there is the potential for the policies to have differential impacts on different equalities groups. Development at any site could have equality implications for new residents and users/workers within the site, and communities in adjacent areas. The extent to which control over these potentially different impacts can be exercised varies.
38. Overall, the draft proposals and policies in the ELP have been designed to attempt to improve the relevant equality strands where possible, and to otherwise have a neutral impact. More specifically, it is not anticipated that there will be a direct impact on equality issues related to gender reassignment, sex, sexual orientation, pregnancy and maternity, or religion and beliefs as a result of the policies and development proposed in the Local Plan. It is considered that the policies and resulting development patterns of the Local Plan are likely to have some positive effect on the age and disability equality strands.

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Appendices

None

Background Papers

The following documents have been relied on in the preparation of this report are:

- The Enfield Local Plan: Main Issues and Preferred Approaches (June 2021) <https://new.enfield.gov.uk/services/planning/elp-2039-reg-18-for-consultation-planning.pdf>
- The draft Policies Map <https://new.enfield.gov.uk/services/planning/draft-policies-map-planning.pdf>

- The Integrated Impact Assessment (June 2021)
<https://new.enfield.gov.uk/services/planning/integrated-impact-assessment-2021-planning.pdf>