

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 | Draft Meridian Water West Bank Supplementary Planning Document |
| Team/ Department | Plan Making Team, Strategic Planning and Design Planning Service, Place Department |
| Executive Director | Sarah Cary |
| Cabinet Member | Cllr Nesil Caliskan |
| Author(s) name(s) and contact details | Lachlan Anderson-Frank MRTPI, Principal Planner Lachlan.anderson-frank@enfield.gov.uk Edward Jones MRTPI, Principal Planner Edward.jones@enfield.gov.uk |
| Committee name and date of decision | Cabinet, 12 th October 2022 |

| | |
|---|------------------------------|
| Date the EqIA was reviewed by the Corporate Strategy Service | 19 th August 2022 |
| Name of Head of Service responsible for implementing the EqIA actions (if any) | Helen Murch |
| Name of Director who has approved the EqIA | |

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?

DRAFT

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

This EqIA covers the implications with regards to public sector Equalities Duty of approving the Draft Meridian Water West Bank Supplementary Planning Document (MWWB SPD) for publication. A supplementary planning document (defined in the Town and Country Planning Regulations 2012) provides detailed guidance on the policies set out in Enfield's Core Strategy and the Edmonton Leaside Area Action Plan (ELAAP). The Draft SPD has been produced to guide development and investment in the future of the Meridian Water West Bank area.

Meridian Water is a Council priority regeneration project, and it is the Borough's largest residential led mixed-use development project. There is a very significant opportunity for transformational change here through mixed use development, following the opening of the new Meridian Water station in 2019. The purpose of the SPD is: to ensure coordinated development, facilitate the delivery of a comprehensively planned area and provide greater guidance to facilitate high quality design, infrastructure provision and placemaking to secure maximum benefits for the wider community, under the planning framework provided by ELAAP

SPD has been prepared to ensure the vision for high quality development as set out in ELAAP is achieved on the Western Bank. To this end it sets out the placemaking principles and parameters of development as well as the environmental, physical and social infrastructure requirements in order to achieve this vision which will be expected from development proposals.

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.

Enfield has relatively high proportions of children and young people under the age of twenty – higher than both London and England averages. The percentage of younger adults - aged 20 to 44 years - is also higher than in England in general, but below that of London as a whole. Both the London area and Enfield have proportionately fewer older residents than the England average. The Edmonton Green Ward in which the SPD sits has a lower mean age (31.6) at the 2011 census than the average for Enfield (35.9). The proposed changes are expected to have a positive impact on all age groups due to the opportunities that will be provided to residents for housing and jobs through the regeneration of the area. In addition, air pollution presents health risks for young children and elderly people. Therefore, the environmental advantages of the proposed SPD (reducing pollution from road traffic, increasing blue and green spaces, etc) would be expected to have a positive impact on these groups. No negative impacts on protected age groups are anticipated and there is nothing proposed within the draft SPD that will benefit or disadvantage one age group over another.

Mitigating actions to be taken

To ensure that the public sector Equality Duty is met, new housing proposals will be required to meet accessibility standards as set out in local and national planning guidance. The Draft SPD also advocates for the delivery of significant new public services and social infrastructure including new schools and community spaces and a health centre, taking into account the needs of different age groups across the wider community including existing residents of surrounding neighbourhoods. In order to encourage responses from a broad range of age groups, Enfield Youth Parliament will be approached to investigate the possibility of holding a workshop session on the SPD during the consultation period.

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.

At the 2011 Census, 47,979 Enfield residents (15.4% of the total) reported a long-term health problem or disability in response to the question, "Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?". Respondents were invited to indicate the level to which their activities were limited. 52.5% of people with a disability or long-term health problem were of working age (16-64 years), with 43% of the total being aged over 65 years. The proposed changes are not expected to negatively impact on those with a disability.

Mitigating actions to be taken

To ensure that the Public Sector Equality Duty is met, new housing proposals will be required to meet accessibility standards as set out in local and national planning guidance. Similarly accessible parking including Blue Badge places should be provided in line with London Plan guidance. The SPD also advocates for accessibly designed public spaces.

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.

Detailed statistics around the proportion of residents in Enfield who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex are not currently available, albeit national statistics indicate this could be as high as 1% of residents. The proposals in the MWWB SPD are not expected to impact materially on this protected group.

Mitigating actions to be taken

New public buildings and spaces with public washrooms within the area covered by the MWWB SPD will need to be designed in line with London Plan Guidance around gender neutral toilets. The London Plan 2021 states that “Where gender-specific toilets are provided, a gender-neutral option should also be provided wherever possible (in addition to unisex disabled persons toilets)”.

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, whereas 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 proposals are not expected to have an impact on those who are married or in a civil partnership.

Mitigating actions to be taken

None. The proposals are considered to have a positive impact on all groups referred to above.

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.

There is a growing body of evidence that links maternal exposure to air pollution and adverse pregnancy outcomes such as miscarriage, low birth weight and pre-term birth.¹ In seeking to control air quality impacts during construction, and more broadly manage the impacts of heavily trafficked streets on future residents, as well as provide more green spaces, the proposals seek to effectively control air pollution.

The proposals are not expected to have a negative impact on those who are pregnant or in the maternity period.

Mitigating actions to be taken

None. The proposals are considered to have a positive impact on all groups noted above.

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.

Based on Enfield's own estimates, residents from White British backgrounds make up 35.3% of Enfield's inhabitants with other White groups (including White Irish) combined at 26.4%. Mixed Ethnic Groups account for 5.5%, Asian Groups for 11.0% and Black groups for 17.9% of Enfield's population. In the Edmonton Ward where the MWWB SPD is located, the estimates in 2011 were 39.4% white groups.

Residents from a Black ethnic background are disproportionately affected by

¹ Royal College of Obstetricians and Gynaecologists, [Outdoor air pollution and pregnancy in the UK](#), June 2021
EqIA template approved by EMT 16th June 2020

homelessness. In 2020/21, 35% of households in Enfield owed a homelessness prevention or relief duty were from a Black or Black British ethnic background, higher than London (30%) and England averages (10%). Residents from Black ethnic groups make up 18% of the population. The SPD seeks to facilitate a significant increase in the delivery of housing, including affordable housing, so a positive impact is anticipated.

National statistics highlight that unemployment is higher among people from ethnic minority backgrounds.² In facilitating the provision of a range of workspaces and a new town centre, it is anticipated the SPD will have a positive effect on communities disproportionately affected by unemployment.

National research highlights inequality in access to green space. National research highlights inequalities in access to green space. A survey carried out by walking charity Ramblers and YouGov in 2020 found that people who identify as being from a Black, Asian or minority ethnic background (39%) are less likely to live within a 5-minute walk of a green space than people from White ethnic backgrounds (58%). People from Black, Asian or minority ethnic backgrounds (46%) also reported being less likely to have a variety of different green spaces within walking distance of where they live than people from White ethnic backgrounds (58%). As the SPD seeks to deliver new green spaces, facilitate the restoration and naturalisation of waterways, and overall increase access to blue and green spaces, a positive effect is anticipated.

Mitigating actions to be taken

Information on ethnicity shows that there is a high proportion of people from ethnic minority groups living in the area, although the specific area covered by the SPD does not have residents currently (except new residents moving into the area who are unlikely to be counted in current statistics). Whilst development proposals set out in the draft MWWB SPD will serve a higher ethnically diverse population, there is nothing in the draft SPD that is expected to disadvantage one group over another. Positive impacts with regards to housing, employment, and access to blue and green spaces are set out above.

²<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/labourmarketstatusbyethnicgroupa09>

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.

82% of residents in the Edmonton Green Ward had a religion in 2011, higher than the average for Enfield of 77%. Of these, 29% were Muslim, almost double the rate in Enfield (17%). The SPD supports the provision of community facilities to meet the needs of a growing population, including places of worship.

Mitigating actions to be taken

There is nothing in the draft MWWB SPD that will benefit or disadvantage one group over another. A positive impact in terms of provision of places of worship is anticipated.

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.

In 2020, 50.5% of the population was female and 49.5% was male. Males outnumber females in every individual year of age up to 27 years, with women outnumbering men in virtually every age thereafter.

The SPD supports the provision of active, well surveilled streets to create a safe public realm. A positive impact is anticipated in terms of women's safety.

Mitigating actions to be taken

There is nothing in the proposed development that will benefit or disadvantage either group over the other. As set out above, a positive impact in terms of women's safety is identified.

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.

There is no reliable data available on this protected characteristic on a ward basis or borough wide basis. However, emerging experimental statistics relating to sexual identity are available nationally and at a regional level. In 2016, estimates from the Annual Population Survey (APS) showed that 93.4% of the UK population identified as heterosexual or straight and 2.0% of the population identified themselves as lesbian, gay or bisexual (LGB). This comprised of:

- 1.2% identifying as gay or lesbian
- 0.8% identifying as bisexual
- A further 0.5% of the population identified themselves as “Other”, which means that they did not consider themselves to fit into the heterosexual, bisexual, gay or lesbian categories

Mitigating actions to be taken

There is nothing in the proposed development that is expected to benefit or disadvantage any group over another. No impacts are expected under this protected characteristic.

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.

According to research undertaken by Transport for London in 2019, the most commonly used form of transport for Londoners with lower household incomes (below £20,000) is walking. The bus is the next most commonly used form of transport with 69% of people with lower household incomes taking the bus at least once a week compared to 59% of all Londoners. The Edmonton wards have a higher proportion of residents on lower incomes. Investment in active travel would therefore be expected to have a positive impact as it will make walking and cycling more convenient and safer, alongside good public transport routes.

Health inequalities are more pronounced in deprived communities. Healthy life expectancy in Upper Edmonton (which encompasses the SPD area) is lower than for more affluent wards. The SPD seeks to improve blue and green spaces and facilities the provision of a green network, as well as create new active travel routes. A positive impact is anticipated in terms of physical and mental health and wellbeing.

Unemployment in the Edmonton wards is higher than the borough average – 8.2% in Upper Edmonton and 9.6% in Edmonton Green. The SPD supports an increase in employment through the provision of new workspaces, which is expected to provide job opportunities for local people and support an economy that works for everyone.

The SPD seeks to support low carbon climate-resilient development. The delivery of energy efficient homes is expected to benefit low income households experiencing fuel poverty.

Mitigating actions to be taken.

There is nothing in the proposed SPD that will negatively impact on socio-economic deprivation. Positive impacts, as set out above, are expected under this protected characteristic.

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 implementation of the guidance in the SPD will be monitored by the local planning authority as part of the Annual Monitoring Report.

In addition, the project is also subject to governance processes linked to infrastructure funding from the Greater London Authority and the Department of Levelling Up through relevant funding programmes.

As a result, there is extensive governance at officer level around the development and its impacts on residents of Enfield.

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 |
|---|---|--------------|-------------------------------|------------------|----------------------|
| Need to ensure that a range of age groups are engaged with as part of statutory consultation on the draft SPD | Approach Enfield Youth Parliament to explore the possibility of holding a bespoke workshop. | Edward Jones | Prior to formal consultation. | None identified. | |
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