

## 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

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	<b>Decision to Lease Land at Whitewebbs Park Golf Course following Section 123 Notice</b>
<b>Team/ Department</b>	<b>Strategic Property Services – Housing, Regeneration and Development</b>
<b>Executive Director</b>	<b>Sarah Cary</b>
<b>Cabinet Member</b>	<b>Cllr Leaver</b>
<b>Author(s) name(s) and contact details</b>	<b>Jennifer Lee Jennifer.lee@enfield.gov.uk</b>
<b>Date of decision</b>	<b>4<sup>th</sup> July 2023</b>
<b>Date of EqlA completion</b>	<b>31<sup>st</sup> May 2023</b>

<b>Date the EqlA was reviewed by the Corporate Strategy Service</b>	<b>31<sup>st</sup> May 2023</b>
<b>Name of Head of Service responsible for implementing the EqlA actions (if any)</b>	<b>Adrian Smallwood</b>
<b>Name of Director who has approved the EqlA</b>	<b>James Wheeler</b>

The completed EqlA 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 EqlA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

## Section 2 – Summary of proposal

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

**Please summarise briefly:**

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

### **Proposed Decision**

It is proposed the Council enter into an Agreement for Lease with Tottenham Hotspur Ltd (THL), in respect of the land formerly occupied by Whitewebbs Park Golf Course (WPGC).

The attached plan details the areas proposed to be leased, subject to planning permission for the proposed use.

### **Reasons for Proposed Decision**

On 30<sup>th</sup> September 2021, the Portfolio decision KD 5177 approved the leasing of WPGC to THL for a 25-year term, firstly through the granting of the agreement for lease, and subject to planning, the Lease.

Prior to the marketing of Whitewebbs Park, the Council engaged directly with stakeholders of the park, to inform them of the Council's plans to market the site and provide updates throughout the marketing process. The stakeholders engaged by the Authority were:

- Ward Councillors
- The Friends of Whitewebbs Park
- The Friends of Hilly Fields
- The Greenbelt Forum
- Whitewebbs Golf Club
- Whitewebbs Golf Course Users

This proposal was advertised by, among other means, the publication of a Notice under Section 123(2A) of the Local Government Act 1962 in a local newspaper over two consecutive weeks from 14<sup>th</sup> December 2022, inviting members of the public to submit objections to the proposal by 15<sup>th</sup> January 2023. Please see the summary of the Section 123 Process in Appendix C, the Analysis of Objections, for further details. The objections received have been considered by the Council and it is recommended that the Council proceeds with the agreement for lease and, subject to planning, the lease.

### **Anticipated Outcomes and Affected Users**

Proceeding with the proposal would mean that the Council and THL would enter into a conditional Agreement for Lease for the former Whitewebbs Golf Course to be leased to THL if the conditions in the AfL are fulfilled. It is anticipated that approximately 18% of Whitewebbs Park as a whole would be dedicated to a women's and girls' football training academy and a turf academy with limited public access.

The remainder of the park would remain accessible to the public and would be managed through a joint estate management agreement between the Council and THL. Prior to the grant of the lease, THL would be obligated to obtain planning permission for the proposed development and complete a series of works to benefit the wider community, including the following.

- Recreation of parkland and landscaping to include tree planting and meadow creation.
- Improved footpaths.
- Improvements to the Southern Clubhouse and car park to include a public café, visitor centre and WCs with visitors' car parking.

As part of the planning process, there would be the usual statutory consultation period during which the local community would have the opportunity to engage with the proposed development and comment.

The golf course is no longer operational with both the northern and southern clubhouses already vacant; therefore, no staff would be affected.

## 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.

According to the 2021 Census, Enfield's population in March 2021 was estimated to be 330,000 (rounded to the nearest hundred).<sup>1</sup>

### Age breakdown of Enfield's population

Age group	Enfield population
<b>0-4</b>	21,300
<b>5-9</b>	22,800
<b>10-14</b>	24,100
<b>15-19</b>	21,300
<b>20-24</b>	19,100
<b>25-29</b>	21,200
<b>30-34</b>	23,100
<b>35-39</b>	24,000
<b>40-44</b>	24,600
<b>45-49</b>	22,700
<b>50-54</b>	22,700
<b>55-59</b>	21,100
<b>60-64</b>	17,100
<b>65-69</b>	12,800
<b>70-74</b>	11,200
<b>75-79</b>	8,200
<b>80-84</b>	6,500
<b>85+</b>	6,400

Enfield has higher proportions of residents aged under 20 than regional and national averages. The proportion of over 65s in Enfield has grown by 16% in the last ten years.

During the consultation, representations were received stating that the proposal involved the loss of green space for use by various community groups and the public generally. Whilst there is no data specifically indicating this, it might be expected that children, retired people and also possibly disabled people benefit disproportionately in terms of the benefits from access to green space on their physical and mental health and well-being.

<sup>1</sup> ONS, [Population and household estimates, England and Wales: Census 2021](#)

The lease terms would preserve free public access to approximately 67% of the leased area and would be designed to enable an enhanced community experience as compared with when the golf course was operational. It is expected that this would benefit park users of all ages.

The proposed changes also seek to enhance and celebrate the open space through the creation of a joint estate management agreement between the Council and THL in relation to the approximately 67% of the leased area that would remain freely open to the public.

Under THL's bid, Whitewebbs Wood would be preserved in its entirety and remain fully publicly accessible and managed by the Council. THL would fund enhancements including signage and repaired trails. The proposal would also include improvements to the Southern Clubhouse and car park to incorporate a café and WCs and public car parking; as well as improvements to the park's infrastructure including to bridleways and footpaths.

If the proposal is approved, approximately 18% of the park would be exclusively used by THL, dedicated to growing Women's and Girls' football, with a new state of the art Football Academy as well as a new Turf Academy. This would have a positive impact on women and girls from the age of 5 upwards. Although this area will have limited public access, it occupies an area which formed part of the previous Golf Course.

Although the proposals, if approved, would result in a change of use for a portion of the green space previously occupied by the golf course, this would not negatively impact residents and visitors of different ages. Instead, enhancements to the green space and infrastructure would benefit park users of all ages, and the creation of a new football academy would support the participation of women and girls aged 5 upwards in sport.

**Mitigating actions to be taken**

No mitigating actions have been identified. Accessibility considerations are considered under disability below.

**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.

According to the 2021 Census, 44,876 people (13.6%) in Enfield reported a disability.<sup>2</sup>

The proposal creates the opportunity to make the former golf course accessible to more user groups through the provision of improved facilities e.g., the southern car park, café and WCs.

The use of the parkland for exercise to aid mental health was a common theme amongst the objections. The proposals to improve the café facilities would provide all park users with an improved space to meet and connect, supporting mental health and wellbeing.

**Mitigating actions to be taken**

- Accessibility to be considered to ensure footpaths include wheelchair access where feasible.
- The implementation of a suitable ratio of blue badge car parking spaces in the proposed improvement works to the car park.
- Provision of accessible WCs.

**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.

There is no anticipated impact on this protected characteristic.

<sup>2</sup> ONS, Disability, England and Wales: Census 2021



<b>Mitigating actions to be taken</b>
n/a

<p><b>Marriage and Civil Partnership</b></p> <p>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.</p>
<p>Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people in a marriage or civil partnership?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>There is no anticipated impact on this protected characteristic.</p>
<b>Mitigating actions to be taken</b>
n/a

<p><b>Pregnancy and maternity</b></p> <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 <b>differential impact [positive or negative]</b> on pregnancy and maternity?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>There is no anticipated impact on this protected characteristic.</p>

**Mitigating actions to be taken**

n/a

**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.

There is no anticipated impact on this protected characteristic.

**Mitigating actions to be taken**

n/a

**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 is no anticipated impact on this protected characteristic.

**Mitigating actions to be taken**

n/a

**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.

THL propose to develop a women's football academy to sustain the growth in women's football, with a regionally significant facility that is dedicated to the development of women's and girls' football from grassroots level – the two components feeding off one another. The facility would be the first of its kind in the UK and would be an inspirational facility for female participation in sport.

The proposed Women's Football Academy would create a positive impact on women, by developing female football talent from U10 level, through U16 and U18 levels up to development squad (reserve team) level.

In addition to the development of academy talent, the facility would also enable the development of female grassroots football through a variety of THL and FA programmes, such as SSE Wildcats (age 5-11); Mini Soccer Teams (7-10); Youth Teams (11-16); FA Mars Just Play (16+); Soccercise (16+); 5s (16+); and Women's Walking Football (16+).

**Mitigating actions to be taken**

n/a

**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 anticipated impact on this protected characteristic.

**Mitigating actions to be taken**

n/a

**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.

There is no anticipated impact on this protected characteristic.

**Mitigating actions to be taken**

n/a

## 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 agreement for lease and steps required through to completing the lease would be managed by Strategic Property Services, so any requirements would be managed through the usual leasing procedures. If and once the agreement for lease is entered into between the Council and THL, THL is expected to apply for planning permission for the proposed development. It is anticipated that equalities considerations would be taken into account as part of the planning decision process

## 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
Limited accessibility for disabled persons	Accessibility to be considered to ensure footpaths include wheelchair access where feasible.	Jennifer Lee	During the planning process which would begin following completion of the agreement for lease.	n/a	
Limited accessibility for disabled persons	The implementation of a suitable ratio of blue badge car parking spaces in the proposed improvement works to the car park.	Jennifer Lee	During the planning process which would begin following completion of the agreement for lease.	n/a	
Limited accessibility for disabled persons	Provision of accessible WCs.	Jennifer Lee	During the planning process which would begin following completion of the agreement for lease.	n/a	