Enfield Council – Retrospective Equality Impact Assessment / Analysis

<table>
<thead>
<tr>
<th>Department:</th>
<th>Regeneration &amp; Environment</th>
<th>Service:</th>
<th>Strategic Planning &amp; Design</th>
</tr>
</thead>
<tbody>
<tr>
<td>Author:</td>
<td>Tony Pierce</td>
<td>Date completed:</td>
<td>16 June 2016</td>
</tr>
<tr>
<td>Contact name:</td>
<td>Tony Pierce</td>
<td>Contact phone number:</td>
<td>2275</td>
</tr>
</tbody>
</table>

### About the service

1. **Brief description of the service covered by this assessment.**
   
   a) The provision of planning policy guidance and production of statutory planning documents, including all of the associated public consultation, evidence gathering and policy drafting.
   
   b) Urban design and heritage conservation statutory regulation and advice.

2. **Please list the main partners, council departments, organisations and service user or target groups for this service.**

   Town Planning affects everyone who lives, works or visits the borough and can be broadly broken down into:


   Departments = All services in R&E, Property, Corporate Strategy, Communications, Finance, Legal.

   Organisations = Development and building organisations, site promoters, lawyers.

   Service users = Residents, single issue pressure groups, land owners, development agents.

3. **If the service is provided by another organisation or agency please give their names and how you ensure they comply with the Council’s Equal Opportunities and Valuing Diversity policy**

   Various planning and property consultancies contribute to the gathering of evidence (survey) and analysis of data sources. They are all required to comply with the Council’s requirements of its constitution, including equalities.
4. Please list any performance objectives / targets relating to equality that your service has / uses.
If as a result of this assessment you are going to introduce new targets, please detail these in your action plan at the end of this form

The objectives relate to plan production mainly, so there are no specific equality targets.

Equalities data collection and monitoring

5. Does your service collect data from service users /applicants for equalities monitoring purposes? **No/Yes**
If YES please detail below how and when this data is collected and where it is stored e.g. *equalities data is collected at application stage and entered into the SAP database.*

Equalities data on all consultee responses is collected at the time of response and held in departmental databases. Standard equalities information is requested on all consultations on plans. There is a low response on paper returns (17%), but much higher on click-through responses (86%).

6. Does your service carry out equalities monitoring to review the take up / accessibility of your service? **No/Yes**
If YES please detail which aspects of your service are monitored and how frequently, then proceed to Q8. If NO please complete Q7.

The service carries out consultee responses on plans and planning documents. We use an agreed template at each plan stage to undertake an equalities assessment to comply with Council’s aims. This is to assess and raise alerts in relation to potential unfair impacts of plans, as they are drafted.

7. If your service does NOT monitor equalities, please detail how you comply with the Council’s Equal Opportunities and Valuing Diversity policy and how you achieve the council’s aim of ‘Fairness for all’ - serving the whole borough fairly and tackle inequality

N/A

8. Monitoring information:
Indicate **YES, NO or NA** (Not Applicable) for each characteristic
<table>
<thead>
<tr>
<th>Question</th>
<th>Y</th>
<th>Y</th>
<th>Y</th>
<th>Y</th>
<th>Y</th>
<th>Y</th>
<th>Y</th>
<th>Y</th>
<th>Y</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does monitoring enable you to profile service users / applicants by the following characteristics?*</td>
<td></td>
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<tr>
<td>Does monitoring enable you to profile the satisfaction of service users by the following characteristics?*</td>
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<td>Does a comparison against baseline demographic data show that service users are representative of the local population in relation to the following characteristics?</td>
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<td>Does monitoring show that there are any under-represented groups within the following characteristics?</td>
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**IF YES PLEASE LIST THE ACTIONS YOU ARE TAKING/WILL TAKE TO ADDRESS UNDER-REPRESENTATION OF PROTECTED GROUPS IN THE ACTION PLAN AT THE END OF THIS ASSESSMENT.**

* If you do not include all protected characteristics in your equalities monitoring please explain why below:

- The equalities assessments result in serving the borough fairly. For example, following a recent public consultation on the Local Plan Review, we have actively sought ways of engaging unrepresented groups of the population, in particular by age, ethnicity and geography. The response return is not large enough to confidently profile characteristics where action is required.
- The service continues to improve the system for recording equalities information taken during consultation events.
- Improved forms design allows for easier and improved recording of equalities information.
- The Council has also revised its Statement of Community Involvement (SCI) in Planning. The SCI highlights key equality groups that need to be considered as part of consultation on the Local Plan.
- The service will seek to use methods that reach groups that do not respond to traditional engagement methods: these include engagement with the youth parliament, participation in area and thematic partnership forums (E.g. Housing Strategic Partnership) and utilising bespoke channels such as the Greek and Turkish press.
Equalities impact

9. Protected characteristics equalities impact:

Please indicate YES, NO or NA (Not Applicable) for each characteristic

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>Disability</th>
<th>Gender</th>
<th>Age</th>
<th>Race</th>
<th>Religion &amp; Belief</th>
<th>Sexual Orientation</th>
<th>Gender reassignment</th>
<th>Pregnancy &amp; Maternity</th>
<th>Marriage &amp; Civil Partnerships</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do satisfaction levels identify any concerns arising from vulnerable groups within the following characteristics?</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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<td>NA</td>
<td>NA</td>
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<tr>
<td>Does your evidence show an adverse impact on any group/s within the following characteristics?</td>
<td>N</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>Are there known or potential barriers to participation for any group/s within the following characteristics?</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
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</tbody>
</table>

IF YES PLEASE LIST THE ACTIONS YOU ARE TAKING/WILL TAKE TO MITIGATE ADVERSE IMPACTS / BARRIERS / CONCERNS IN THE ACTION PLAN AT THE END OF THIS ASSESSMENT.

- Set up a Commission to oversee a public debate on growth giving specific targets for engagement & response from unrepresented groups.
- Considering a Big Conversation as a marketing tool to reach more unrepresented groups.
- Ensure the policy approach continues to be inclusive and recognises the key elements of the vision to create sustainable communities of the future in the borough. Addressing the years of blight and poor environment in parallel with tackling deprivation issues in the south and east of the borough will bring positive impacts for equality groups. The detailed spatial framework through the Area Action Plans will allow comprehensive delivery of new development that meets the future needs of the demographic in these areas.
- Continue to ensure that all documents of the Local Plan are available on the Council’s website.

10. Could the service or policy discriminate, directly or indirectly, according to the accompanying definitions? No/Yes

If YES, please set out how it is justifiable under legislation in the box below.

As the service relies on individual responses, often uninitiated, there is a strong likelihood of indirect discrimination of groups without the resources, skills or knowledge to consider and express their views. These are noted and taken account in all interpretation and council response to comments collected by consultation programmes.
11. Could the service or policy have an adverse impact on relations between different groups / community cohesion? **No/Yes**  
   If **YES**, describe below and add any actions to mitigate this impact in your action plan.

   N/A

12. Have you received any complaints about your service in respect of equality issues? **No/Yes**  
   If **YES**, please give a brief description and what action has been taken as a result.

   N/A

13. How does the service contribute to eliminating discrimination, advancing equality of opportunity and fostering good relations between different groups in the community?

   The service area will continue to work with both the departmental and Council equality leads in preparing EqIA’s for individual Local Plan projects with specific action plans that that will aim to achieve overall service area action plan targets. All EqIA’s will be published on the Council’s website under the service area.

14. Please give specific examples of success / best practice your service can evidence in terms of ‘narrowing’ the gap through improved outcomes / reduced inequality for service users

   Numerous groups and organisations have been identified to provide comprehensive and overlapping coverage of all people and groups in Enfield for the purposes of consultation for the Local Plan. A consulting database is maintained of over 1,500 individuals and organisations. The Local Plan database includes a wide range of groups and organisations. The database is regularly updated to ensure consultation is inclusive and effective. This database is a clear example of success as it ensures that a wide range of groups are notified. In addition, this database also allows the service to identify whether there are any gaps in regards to the groups that are notified. This allows the service to ensure that all groups are included in the consultation process.

   During consultation, the service ensures that copies of the documents are made available in Council buildings, including libraries. Consultations aim to cover a wide section of the population through a presence such as at community festivals, supermarkets and in schools. Targeted consultation is undertaken to ensure consultation is inclusive, in line with the Statement of Community Involvement. Heritage led regeneration projects are often in the most deprived parts of the borough with a range of communities from diverse backgrounds.

   In addition, we have actively looked to involve people who are unfamiliar to traditional consultation engagement procedures. For the first stage of the Local Plan Review, the planning policy team used an online questionnaire in order to involve people who were unfamiliar with traditional consultation engagement
procedures. This resulted in the team experiencing a high level of responses. Other measures have included engagement with the youth parliament.

15. Does your service or policy provide financial support for the protected groups?  No/Yes
   If YES, please list below and the value of the financial support.

   N/A

16. Socio-economic equalities impact:
   Indicate YES, NO or NA (Not Applicable) for each characteristic

<table>
<thead>
<tr>
<th>Characteristics</th>
<th>Yes</th>
<th>Yes</th>
<th>Yes</th>
<th>Yes</th>
<th>Yes</th>
<th>Yes</th>
<th>Yes</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communities living in deprived wards/areas</td>
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<td>People out of employment or education or training</td>
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<td>People with low academic qualifications</td>
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<td>People living in social housing</td>
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<td>Lone parents</td>
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<td>People on low incomes</td>
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<td>People in poor health</td>
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<td>Any other socio-economic factor</td>
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   17. If YES answered above – please describe the impact (including any positive impact on social economic inequality) and any mitigation if applicable

   The adopted Core Strategy (2010) sets out the Council’s spatial planning framework for development of the borough for the next 15-20 years and aims specifically to focus growth and regeneration in the south and east of the borough where the greatest levels of deprivation and inequality exist. The Core Strategy is supported by more detailed Area Action Plans, Supplementary Planning Documents, Planning Briefs and technical evidence reports that are also being prepared to provide more detailed planning frameworks to guide and facilitate regeneration in these areas.

   The Core Strategy and Area Action Plans are supported and informed by the Infrastructure Delivery Plan which identifies the key social, physical, economic and green infrastructure needed to deliver the Core Strategy objectives.

   The policy approach is inclusive and recognises the key elements of the vision to create sustainable communities of the future in the borough. Addressing the years of blight and poor environment in parallel with tackling deprivation issues in the south and east of the borough will bring positive impacts for equality groups. The detailed spatial framework through the Area Action Plans will allow comprehensive delivery of new development that meets the future needs of the demographic in these areas.
All documents of the Local Plan are available on the Council’s website.

**Consultation and engagement**

18. Please list any recent consultation activity on your service, any specific equalities groups that were targeted, how the results have been publicised and what action has been taken in response to the results. (Please state the source of data)

(If more information is needed to understand the views of disadvantaged groups please add this to your action plan)

Under the Local Plan, the Planning Policy Team is producing a series of documents which must be consulted on in line with the adopted Statement of Community Involvement and subsequent government Regulations. Accompanying Equalities Impact Assessments and Consultation Strategies are prepared for each Local Plan documents which detail approaches to including equalities groups in the consultation.

During 2015/16 such documents were prepared and consulted on including:

- Consultation on a New Local Plan for Enfield 2017-2032;
- Draft Ritz Parade Development Brief;
- The Revised Draft Section 106 Supplementary Planning Document.

For each of the respective Local Plan documents and the associated policy issues, we have carried out, in line with the Council’s guidelines, an Equalities Impact Assessment (EqIA) at each stage of document preparation. We have worked with the Council’s Equalities Officer by carrying out targeted consultation highlighted through this process to test the proposed Local Plan policies and inform revisions. Events have included targeted meetings with the Area Partnerships and associated community and business organisations. Contribution to the Enfield Voluntary Action Newsletter (EVA); consultation letters sent to representatives from the Black and Ethnic Minority (BME) community; consultation letters to be sent to groups representing children and young people (including Enfield Children and Young Persons Service and Enfield Parents and Children) and older people (including Age Concern Enfield and the Over 50s Forum); and continued consultation with the Enfield Youth Parliament and students from the Oasis Academy Enfield.

From April 2015 – March 2016, Conservation and Heritage have consulted with numerous community stakeholders on the Conservation Area Character Appraisal and Management Proposals. Targeted engagement was arranged with conservation study groups representing affected conservation areas and the Conservation Advisory Group. Consultation was also carried out for the Local Heritage Reviews criteria and also Broomfield House.
### Staff training and development

19. **Please set out below the staff training undertaken on equalities.**
   
   If there is a need for additional staff training please detail this in your action plan.

**Evidence of staff training:**

Staff have attended the Council’s Equality and Diversity Training. This enables a better understanding of equality and diversity issues in the borough.

**Outcomes from such training:**

The training has allowed staff to mindful of equalities issues through the service area projects that are being delivered.

### Review and publicity

20. **Please set out in your action plan when you will review this assessment and how it will be publicised**

   (Note: all EQIAs sent to the Performance Management Team are published on the Council’s website)

The service area will continue to work with both the departmental and Council equality leads in preparing EqIA’s for individual Local Plan projects with specific action plans that that will aim to achieve overall service area action plan targets. All EqIA’s will be published on the Council’s website under the service area.
### Enfield Council – Retrospective Equality Impact Assessment / Analysis

**Action plan template for existing services**

**Name of service/policy:** Strategic Planning & Design

**Team:** Planning Policy/Heritage and Design  
**Department:** R&E

**Service manager:** Tony Pierce

<table>
<thead>
<tr>
<th>Identified Issue</th>
<th>Action Required</th>
<th>Lead Officer</th>
<th>Timescale/ By When</th>
<th>Costs</th>
<th>Review Date/ Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Publicity of this assessment and when it will be reviewed</td>
<td>Include in EQIA</td>
<td>Gerry Ansell</td>
<td>January 2017</td>
<td>Nil</td>
<td>December 2016</td>
</tr>
<tr>
<td>The consultation method on Local Plan review initial issues indirectly discriminated against those unfamiliar with traditional engagement procedures.</td>
<td>Promote growth issues, including green belt, to young adults and those in the east of Enfield</td>
<td>Gerry Ansell</td>
<td>January 2017</td>
<td>Currently being ascertained</td>
<td>September 2016</td>
</tr>
<tr>
<td>Low number of paper returns for the Equal Opportunity Monitoring Forms.</td>
<td>Research and evaluate ways of encouraging higher levels of paper returns.</td>
<td>Principal Planning Officer</td>
<td>On-going</td>
<td>Unknown</td>
<td>June 2016</td>
</tr>
<tr>
<td>Predictive EQIAs required whenever a significant change in service or policy is proposed.</td>
<td>Ensure EQIA regulations are identified at project planning stage.</td>
<td>Head of Service</td>
<td>On-going</td>
<td>Unknown</td>
<td>June 2016</td>
</tr>
<tr>
<td>Need specific targets for engagement &amp; response from unrepresented groups</td>
<td>Set up a Commission to oversee a public debate on this.</td>
<td>Head of Service</td>
<td>On-going</td>
<td>Unknown</td>
<td>June 2016</td>
</tr>
<tr>
<td>Need a marketing tool to reach more underrepresented groups.</td>
<td>Set up a Big Conversation.</td>
<td>Head of Service</td>
<td>On-going</td>
<td>Unknown</td>
<td>June 2016</td>
</tr>
<tr>
<td>Recognise the key</td>
<td>Ensure the policy</td>
<td>Whole Service</td>
<td>On-going</td>
<td>Unknown</td>
<td>June 2016</td>
</tr>
<tr>
<td>Elements of the vision to create sustainable communities of the future in the borough.</td>
<td>Approach continues to be inclusive.</td>
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<tr>
<td>Ensure that all Local Plan documents are readily available to the public.</td>
<td>Ensure that all documents are available on the website and that the relevant webpages are updated.</td>
<td>Whole Service</td>
<td>On-going</td>
<td>Unknown</td>
<td>June 2016</td>
</tr>
<tr>
<td>Allow for easier and improved recording of equalities information.</td>
<td>Continue to research ways to improve form design and to also research ways in which recording responses from consultation events can be improved.</td>
<td>Whole Service</td>
<td>On-going</td>
<td>Unknown</td>
<td>June 2016</td>
</tr>
</tbody>
</table>

Date to be reviewed: .................................. 

**APPROVAL BY THE RELEVANT ASSISTANT DIRECTOR - NAME:.................................. SIGNATURE:..................................**