

Equality Impact Assessment (EqIA) Name of Project	Tottenham Hotspur Football Club stadium and associated development – land appropriation agreement	Cabinet meeting date If applicable	Cabinet
Service area responsible	Chief Operating Officer		
Name of completing officer	Sarah Lovell	Date EqIA created	10th November 2015
Approved by Director / Assistant Director	Helen Fisher	Date of approval	23 rd November 2015

The Equality Act 2010 places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to:

- **Eliminating discrimination, harassment and victimisation**
- **Advancing equality of opportunity**
- **Fostering good relations**

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a ‘**Specific Duty**’ to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Councils commitment to equality; please visit the Council’s website.

Stage 1 – Names of those involved in preparing the EqIA		
1. Project Lead	Sarah Lovell	5.
2. Equalities / HR	Zakir Chaudhry	6.
3. Legal Advisor (where necessary)	Michelle Williams	7.
4. Trade union		8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups

This document assesses the impact of a Cabinet decision to support the revised Northumberland Development Project (NDP) by agreeing the following recommendations:

- (i) To acquire the freehold interest in the THFC Site, pursuant to Section 227 of the Act for planning purposes;
- (ii) To dispose of the THFC Site to Meldene Limited (a THFC company) pursuant to Section 233 of the Act;
- (iii) Resolves that it is the intention of the Council that its resolutions under Sections 227 and 233 are intended to attract the application not only of Section 237, but also any replacement, whether Clause 137 of the Housing and Planning Bill (as enacted) or otherwise;
- (iv) That the terms of the acquisition and the disposal for the THFC Site shall be based on the Heads of Terms (“the Heads of Terms”) attached at Appendix 2 (exempt) of this report;
- (v) To give delegated authority to the Director of Regeneration Planning and Development in consultation with the Assistant Directors of Corporate Property & Major Projects and Corporate Governance to agree any variation to the Heads of Terms; and
- (vi) To accept the compensation offer from THFC in relation to Council owned properties that have their freehold right of light infringed by the revised NDP and give delegated authority to the Assistant Director of Corporate Property & Major Projects in consultation with the Assistant Director of Corporate Governance to agree the deed of release for these properties.

The reasons for supporting these recommendations are set out in detail in the Cabinet report. However, the overarching rationale for supporting all of the recommendations above is that the Council wishes to support and facilitate the delivery of the revised NDP scheme as it will bring significant public benefits, act as a catalyst for wider regenerative change and will deliver the objectives for north Tottenham as set out in the Strategic Regeneration Framework (“SRF”) and the Tottenham Area Action Plan (“AAP”). If the Council were to not agree these recommendations, the revised NDP scheme will be at risk of injunction and will not be able to secure the necessary funding.

The SRF sets a twenty year vision for Tottenham and sets out seven strategies for achieving this vision, these strategies include:

- World-class education and training

- Improved access to jobs and business opportunities
- A different kind of housing market
- A fully connected community with even better transport links
- A strong and healthy community
- Great places
- The right investment and high quality development

The SRF identifies Northumberland Park and the area around Tottenham Hotspur in particular, as a sports and leisure destination (forming part of the wider commercial and residential development plans). Public realm improvements to bring railway arches back into use and redevelop White Hart Lane station are a key aspect of any redevelopment.

The revised NDP also aligns with the AAP. The AAP has been developed by the Council to guide future development and regeneration in Tottenham. The next iteration of the AAP will be published in accordance with Regulation 19 of the Town and Country Planning (Local Development) (England) Regulations 2012 for consultation from 4th December to 8th February 2016 . Following consultation, the Plan will be subject to an Examination in Public and is anticipated to be adopted in autumn 2016.

The AAP identifies the THFC Site as a key development site within north Tottenham and sets the following vision for the area:

“North Tottenham will be transformed into a mixed and sustainable community and new leisure destination for London- a place where people want to live, work and visit.

This vision also recognises the importance of development on the THFC Site in meeting the vision for the area:

“With the Tottenham Hotspur FC development scheme serving as a catalyst for wider area change, there will be a substantially improved local centre with a balanced mix of high quality homes, jobs, community and leisure facilities”

The AAP sets a number of requirements for the site, which include:

- Redevelopment of the existing football stadium to increase match day capacity, with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.
- Providing a mix of leisure uses around Tottenham Stadium to ensure it s a destination on match and non-match days;
- Contributing to creating a wider commercial and visitor destination for the area;
- Facilitating walking and cycling links, particularly between nearby stations at White Hart Lane and Northumberland Park, and the stadium.

The revised NDP aims to deliver all of the requirements identified above. The revised NDP will also act as a regeneration catalyst for north Tottenham bringing significant investment and transformative change that will facilitate the delivery of the Council’s wider regeneration objectives

for Tottenham.

This EqIA explores the implications of supporting the revised NDP development, and the effect on parties whose right to light will be affected by the recommendations above, in regard to the provisions of the Equality Act 2010 to:

- a) Eliminate discrimination, harassment and victimisation of persons protected under the Equality Act (“protected characteristics”);
- b) Advance equality of opportunity for protected characteristics; and
- c) Foster good relations between groups who share a protected characteristic and those that do not share those characteristics.

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment

Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council’s workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?
Not applicable	

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment

This section to be completed where there is a change to the service provided

Data Source (include link where published)	What does this data include?
2011 Census	Tenure, ethnicity, sex, disability, age
Chapter 14 of the Environmental Statement (socio-economics) that accompanied the NDP revised planning application (HGY/2015/3000).	Annual Population Survey (APS), Business Register and Employee Survey (BRES) and Department of Work and Pensions (DWP) data, among others. Where additional public data sources have been used in this report they have been identified clearly.

**Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:
Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	None	Details
Sex	✓	✓		<p>Table 4 indicates that there is a similar amount of men and woman in the Northumberland Park Ward.</p> <p>No element of the proposal is expected to impact on the equality of opportunity, or discriminate against residents, business owners, employees or users of community facilities with this protected characteristic disproportionately to any other groups of people.</p> <p>Employment opportunities provided as part of the development will particularly benefit local people, who tend to share more protected characteristics than the London average. Research by the GLA (2006 found that service sector jobs in London go disproportionately to a number of groups with protected characteristics including women. Many of the jobs are in the hospitality, retail and service sectors which respond to local need reflecting known demands of people in Tottenham for jobs in personal service, sales, customer service and process / elementary level work.</p>
Gender Reassignment			✓	<p>Data is not readily available on this protected characteristic.</p> <p>However, the proposal is not expected to impact on residents, business owners, employees or users of community facilities with protected characteristics in this group disproportionately to other groups.</p>
Age	✓	✓		<p>Table 1 shows that the largest age group in the Northumberland Park Ward is 25-34 year olds.</p> <p>No element of the proposal is expected to impact on the equality of opportunity, or discriminate against residents, business owners, employees or users of community</p>

			<p>facilities with this protected characteristic disproportionately to any other groups of people.</p> <p>Young people, who are represented more than average in Northumberland Park compared to London and Haringey, will benefit in particular from additional employment and training opportunities, access to homes and enhanced playable space provision. The area currently performs poorly in terms of health inequalities relating to children, with high levels of obesity and low levels of physical activity and participation in sport against national standards (Data from Sport England Small Area Estimates, 2012). Good quality, safe, accessible playable space for children of all ages is critical in redressing inequalities and promoting good health and social interaction. The proposed development provides in excess of the legal requirement of playable space for children, in a safe and accessible environment.</p> <p>Employment opportunities will also respond to the recognised needs of a high proportion of young people in the area.</p> <p>Crime levels in the area are currently high with recorded crimes per head of population of all types (with the exception of Theft and Handling) being higher for Northumberland Park, and for the wider Tottenham area than for Haringey and London as a whole. Rates of violence against the person were the highest in the local area at 50 per 1,000 people for the 12 month period to June 2015.</p> <p>The perception of safe access and community wellbeing is a concern to all groups, and groups with protected characteristics (including children and young people, older people, disabled people, BME and faith groups, LGBT people and other protected characteristics) may be or feel particularly vulnerable. An improved physical environment, with design measures including active frontage, CCTV and lighting allied to significantly increased footfall will lead to a reduced perception of crime and improved perception of safety will therefore be beneficial to these groups. Evidence from the closest London-based comparator (Emirates Stadium) highlights that match-day arrests have remained constant since Arsenal's move from Highbury, and crime rates in the wider area have fallen.</p> <p>Older people will benefit in particular from enhanced open space and accessibility, accessible housing and crime/safety measures.</p>
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Disability	✓	✓	<p>Table 2 indicates that the number of people in Northumberland Park with some type of disability is higher than the borough average. From this, it could be inferred that a number of the parties negatively affected by having their right of light infringed by the revised NDP scheme may have a disability.</p> <p>No element of the proposal is expected to impact on the equality of opportunity, or discriminate against residents, business owners, employees or users of community facilities with this protected characteristic disproportionately to any other groups of people.</p> <p>Disabled people will benefit in particular from improved accessibility in the area around the stadium, improved and fully accessible public realm, continued activity of the Tottenham Hotspur Foundation, and new homes designed to comply with legal standards (including for wheelchair access).</p> <p>All new homes within the NDP will meet Building Regulations 2010 Part M (2&3) Schedule 1 requirements and be built to Lifetime Homes standards as a minimum, with at least 10% of all units provided being wheelchair accessible or designed so as to be easily adaptable for wheelchair users or people with impaired mobility in accordance with London Plan Policy 3.8, the Mayor's Housing SPG, Draft Interim Housing SPG (May 2015) and Local Plan Policy SP2.</p>
Race & Ethnicity	✓	✓	<p>Table 3 indicates that the number of people in Northumberland Park with a BME background is higher than the borough average. From this, it could be inferred that the parties negatively affected by having their right of light infringed by the revised NDP scheme will include those with a BME background and those without this characteristic.</p> <p>No element of the proposal is expected to impact on the equality of opportunity, or discriminate against residents, business owners, employees or users of community facilities with this protected characteristic disproportionately to any other groups of people.</p> <p>BME groups in particular will benefit from access to employment and training opportunities. As noted above, employment opportunities, provided as part of the</p>

				development in question will particularly benefit local people, which therefore responds to the needs of the comparatively high percentages of BME groups present in this location in comparison to other parts of Haringey and London overall. Research by the GLA (2006) found that service sector jobs in London go disproportionately to a number of groups with protected characteristics including BME residents. Many of the jobs are in the hospitality, retail and service sectors which respond to local need reflecting known demands of people in Tottenham for jobs in personal service, sales, customer service and process / elementary level work. In addition to having a close fit to the occupational needs of locally unemployed people, many of the jobs supported by the development are in sectors with a predominantly local catchment. Retail employment in London tends to have a strong local catchment. Currently, around 13% of jobs in Northumberland Park are taken by residents, and around 50% from the Wider Impact Area. GLA data shows that of retail jobs in London, over 40% are taken by residents of the same borough compared to 30% for all jobs
Sexual Orientation			✓	Data is not readily available on this protected characteristic. However, the proposal is not expected to impact on residents, business owners, employees or users of community facilities with protected characteristics in this group disproportionately to other groups.
Religion or Belief (or No Belief)			✓	As Table 5 indicates, as with the rest of Haringey, Northumberland Park has a large Christian population. There is also a high proportion of Muslims compared to Haringey and London. From this, it could be inferred that some of the parties negatively affected by having their right of light infringed by the revised NDP scheme will be from a Christian and Muslim background. No element of the proposal is expected to impact on the equality of opportunity, or discriminate against residents, business owners, employees or users of community facilities with this protected characteristic disproportionately to any other groups of people. The NDP does not discriminate against any religion or belief.
Pregnancy & Maternity			✓	Data is not readily available on this protected characteristic. However, the proposal is not expected to impact on residents, business owners,

				employees or users of community facilities with protected characteristics in this group disproportionately to other groups.
Marriage and Civil Partnership			✓	<p>As Table 6 indicates, similar to the rest of Haringey, Northumberland Park has a high proportion of single adults (never married or never registered a same-sex civil partnership). From this, it could be inferred that a number of people negatively affected by having their right of light infringed by the revised NDP scheme will be single.</p> <p>No element of the proposal is expected to impact on the equality of opportunity, or discriminate against residents, business owners, employees or users of community facilities with this protected characteristic disproportionately to any other groups of people.</p>

The revised Northumberland Development Project

The planning application for the Northumberland Development Project (Ref. HGY/2015/3000) includes:

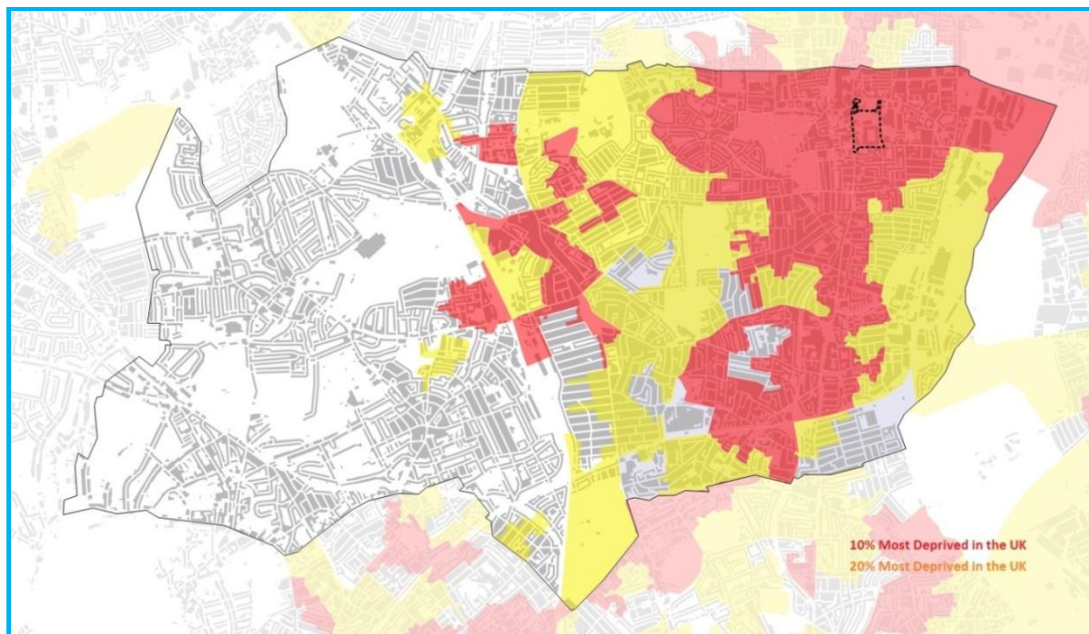
The proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works.

Development Context – Northumberland Park & Tottenham

Section 14.4 of the Socio-economic ES chapter submitted in 2015 identifies the baseline characteristics of the area in respect of some protected characteristics (age, ethnicity), along with economic and employment information (skill level, qualifications, occupation, employment and reason for economic inactivity, claimant count and sought occupation) and housing information (tenure, type and rates of overcrowding). It also includes capacity information on education and healthcare facilities in the local area, open space, sports facilities and other community facilities such as libraries and community centres.

In summary, this highlights that:

- The area is within the most 10% of deprived areas in the UK according to the Government's 2015 indices of multiple deprivation, and is particularly deprived in terms of income, housing, crime and employment;



- Northumberland Park has a relatively young and ethnically diverse population, with over a quarter of residents aged under 16 years, and only 8% over 65 years. The wider area in Tottenham also has a younger age profile than Haringey, Enfield and London averages;
- London's population has continued to become more ethnically diverse, and this has accelerated in Northumberland Park and Tottenham where Black and Minority Ethnic (BME) groups make up 61% and 52% of the population respectively;
- Residents of the local area are less likely to be economically active than residents of the Wider Impact Area or across London overall;
- The proportion of unemployed residents is also higher in Northumberland Park where 10% of working-age adults are unemployed, compared to 6% across the Wider Impact Area, and 5% across London as a whole;
- A lower proportion of Northumberland Park ward residents work in management/professional roles (27% and 34% respectively) compared to approximately half of residents in the average across Haringey and Enfield and in London overall;
- Local residents are also more likely to have no qualifications, and less likely to have higher qualifications than residents living across London as a whole;
- Almost half of households in Northumberland Park ward live in social rented homes – this is a higher proportion compared to wider geographical area;

- There is also a higher proportion of purpose-built flats, and a lower proportion of houses in Northumberland Park ward in comparison with the other study areas;
- Levels of overcrowding are generally higher in the local area compared to the Wider Impact Area and London as a whole – this is particularly pronounced in rented homes (both social and private rented tenures).

As part of LBH's duty to have regard to protected characteristics under the Equality Act (2010), the Council produces and regularly updates ward profiles on its Equality Impact Assessment webpage. Most of this data is sourced from the 2011 Census.

For Northumberland Park ward, this confirms that:

- Women account for 50.2% of the population in Northumberland Park and 50.3% in Tottenham, compared to 50.5% in Haringey.
- Northumberland Park has a higher proportion of young people (with 33% aged 0-19) compared to Tottenham and Haringey (29% and 25% respectively).
- Northumberland Park has a greater proportion of residents from BME groups (61%) compared to Haringey (39%), with much larger representation of African and Caribbean groups (22% and 14% respectively, compared to 9% and 7% on average for the Borough).
- In terms of faith, there is a significant representation of Muslim groups in Northumberland Park, representing 24% of all residents compared to 14% for Haringey. A lower proportion of residents have no religion (13% compared to 25% across Haringey), and a slightly higher proportion (51%) are Christian compared to Haringey (45%).
- Disability affects a greater proportion of people in Northumberland Park as in Haringey, with 17% of residents having day-to-day activities limited to some extent, compared to 14% across the Borough.
- 47% of residents in Northumberland Park are single (never married or registered in a civil partnership). Greater proportions of residents are divorced or separated compared to the Borough Average. Overall 25 residents are in same-sex civil partnerships in Northumberland Park ward, of a total 1,191 people in Haringey.
- Data is not available at a sub-Regional level for sexual orientation. Overall, 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). If the same applies to Haringey, this equates to 6,491 residents.
- Data is not available at a sub-national level for gender reassignment.

The following table details the total number and proportion of residents sharing protected characteristics in Northumberland Park, Tottenham, Haringey and London, where data is available.

Table 1- Age profile

Age	Northumberland ward	Park Haringey	London ward
0-15	14.8%	20.4%	19.9%
16-24	13.3%	11.8%	12.3%
25-34	30.9%	22.2%	19.9%
35-44	17.0%	16.8%	15.6%
45-54	10.2%	12.2%	12.5%
55-64	6.2%	7.8%	8.7%
65+	7.5%	8.8%	11.1%

Table 2- Disability profile

Disability	Northumberland ward	Park Haringey	London ward
Day-to-day activities limited a lot	10.4%	6.8%	8.1%
Day-to-day activities limited a little	10.9%	7.2%	8.8%
Day-to-day activities not limited	78.6%	86.0%	83.2%
ESA Claimants (May 2015)	1,085	11,740	291,330

Table 3- Ethnicity profile

Ethnicity	Northumberland ward	Park Haringey	London ward
English/Welsh/Scottish/Northern Irish/British	16.6%	34.7%	44.9%
Irish	1.7%	2.7%	2.2%
Gypsy or Irish Traveller	0.1%	0.1%	0.1%
Other White	20.7%	23.0%	12.6%
White and Black Caribbean	2.7%	1.9%	1.5%
White and Black African	1.6%	1.0%	0.8%
White and Asian	0.9%	1.5%	1.2%
Other Mixed	2.1%	2.1%	1.5%
Indian	1.3%	2.3%	6.6%
Pakistani	0.5%	0.8%	2.7%
Bangladeshi	1.5%	1.7%	2.7%
Chinese	1.0%	1.5%	1.5%
Other Asian	3.5%	3.2%	4.9%
African	22.0%	9.0%	7.0%
Caribbean	13.5%	7.1%	4.2%
Other Black	4.8%	2.6%	2.1%
Arab	0.9%	0.9%	1.3%
Any other ethnic group	4.5%	3.9%	2.1%

Table 4- Sex profile

Sex	Northumberland ward	Park Haringey	London
Male	49.8%	49.5%	49.3%
Female	50.2%	50.5%	50.7%

Table 5- Religion or Belief (or No Belief)

Religion or Belief (or No Belief)	Northumberland ward	Park Haringey	London
Christian	50.6%	45.0%	48.4%
Buddhist	1.0%	1.1%	1.0%
Hindu	1.1%	1.8%	5.0%
Jewish	0.2%	3.0%	1.8%
Muslim	24.2%	14.2%	12.4%
Sikh	0.2%	0.3%	1.5%
Other religion	0.3%	0.5%	0.6%
No religion	13.2%	25.2%	20.7%
Religion not stated	9.2%	8.9%	8.5%
Sexual Orientation			
Lesbian, gay or bisexual	N/A	N/A	3.2%

Table 6- Marriage and Civil Partnership

Marriage and Civil Partnership	Northumberland ward	Park Haringey	London
Single (never married or never registered a same-sex civil partnership)	46.7%	50.0%	44.1%
Married	32.0%	33.3%	39.8%
In a registered same-sex civil partnership	0.2%	0.6%	0.4%
Separated (but still legally married or still legally in a same-sex civil partnership)	6.6%	4.0%	3.2%
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	10.2%	8.2%	7.4%
Widowed or surviving partner from a same-sex civil partnership	4.3%	3.9%	5.0%

Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups: Positive and negative impacts identified will need to form part of your action plan.				
	Positive	Negative	Details	None – why?
Sex				Not applicable
Gender Reassignment				Not applicable
Age				Not applicable
Disability				Not applicable
Race & Ethnicity				Not applicable
Sexual Orientation				Not applicable
Religion or Belief (or No Belief)				Not applicable
Pregnancy & Maternity				Not applicable
Marriage and Civil Partnership				Not applicable

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
The analysis identifies that the Northumberland Development Project is	A detailed consultation and engagement exercise has been

<p>anticipated to have significant social and economic benefits for the local area and will have an overall positive impact for communities in the area. Given the profile of the area this will include a large proportion of those with the characteristics protected under the Equality Act.</p> <p>Some parties will be affected by the development in terms of their right to light. Although the profile of the area suggests the affected parties may include a large proportion of those with protected characteristics, it is not anticipated that the proposal will impact on parties with these protected characteristics disproportionately to others. The affected parties have been engaged throughout the consultation process and offered independent information and support.</p>	<p>undertaken by GIA, working for THFC, to identify the properties and their occupiers whose rights to light are likely to be affected by the NDP.</p> <p>At all stages of consultation, the affected parties have been offered clear and independent information and support (including independent commercial and legal advice), and been made aware that in the event that Section 237 is used to extinguish Right to Light claims over the NDP, then the rights holder would have the pre-existing ability to make Right of Light claims at a point in the future, but that their right to compensation would not be removed.</p>
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Stage 7 - Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?
<p><u>Northumberland Development Project consultation</u></p> <p>A significant amount of public consultation has been undertaken throughout pre-application stages for the original application between 2009 and 2012, the subsequent CPO, and the recent application for the Northumberland Development Project (Ref. HGY/2015/3000).</p> <p>The approved scheme in 2011 was supported by a Statement of Community Involvement (SCI) which summarised the THFC's pre-submission consultation activities. The SCI, the wider Consultation Strategy and two public exhibitions held prior to submission were devised in consultation with LBH, and included support from the Council's Translation and Interpretation Services team to present the material at the first public exhibition in five languages, with translation on request thereafter.</p> <p>A new SCI was prepared for the lead up to the submission of the revised proposals in 2015, which outlines in full the scheme context and objectives for the consultation strategy (see below); the approach and method to consultation; the materials used and results of the process.</p> <p>Through consultation, the design of the scheme has evolved in response to concerns raised by statutory and other consultees and members of the public over a range of different areas including building control, accessibility, transport/traffic, community safety, and open space design/use.</p> <p>THFC engaged with the local community, THFC supporters and key groups and individuals, resulting in overwhelming support for the original scheme in 2011. With the scheme revisions and added benefits that this new design would bring, the need to undertake further consultation work</p>	

was recognised and THFC invested heavily in carrying out this programme.

In order to maximise transparency and gain as much feedback as possible from interested parties, a number of objectives were put in place including:

- To genuinely engage local people and a wide range of stakeholders, from residents in neighbouring streets to schools and businesses, to the local authority;
- To provide opportunities for local people and fans to view and comment on the plans as they develop;
- To explain the proposals and how they would regenerate the area;
- To widely circulate all comments received so that they can be properly considered and so that the scheme can respond appropriately;
- To understand and address where possible all of the issues / concerns / objections before the application is made;
- To work closely with Haringey Council to ensure key officers were aware of our planned consultation activities and could influence them; and
- To explain the need for these design improvements and developments.

Each phase of consultation has therefore undergone extensive promotion to ensure that as many members of the local community, as well as the supporters of THFC are given the opportunity to comment on proposals.

A number of initiatives were included within the Consultation Strategy to ensure that all sectors of the residential and business community were made aware of the proposals and had the opportunity to comment and influence the scheme, for example:

- In advance of issuing letters to alert community members to the revised application, a full database of stakeholders was created that included council members, officers, other London political figures, local community groups, statutory groups, residents associations as well as local schools and churches.
 - All these individuals and groups were given the opportunity to discuss the proposals in more detail and many more were offered meetings with the project team to review the new scheme.
 - Each of the Haringey Councillors was also included on the database to ensure they received a copy of all letters and the community newsletter.
- The community newsletter The Hotspur was door-dropped to over 26,000 local residents in the area with details of how to feedback comments. This process was agreed with LBH officers prior to operation.
- Letters announcing the start of consultation and the revised scheme details were sent to over 220 political and community stakeholders including key statutory consultees.
- A follow-up letter was also sent to all stakeholders with a copy of The Hotspur

- A news story was posted on THFC homepage, directing visitors to the Future Plans micro-site.
- A press notice announcing the revised scheme details and consultation information was issued to local, regional and national papers.
- On launch day for the consultation, a digital copy of The Hotspur was made available for download on THFC website, www.tottenhamhotspur.com

An overwhelming majority of the responses to consultation were positive, neutral or constructive. Of those that objected to the development or raised negative comments, most were related to traffic and accessibility, and the removal of listed buildings.

The consultation process has led to the following alterations to the design and operation of the NDP with positive outcomes for groups with protected characteristics:

- **Public Realm:** Discussions were held with officers at LBH to get a better understanding as to how the paving materials and external lighting would be designed to work with the existing context of the surrounding area. Further discussions were held around the design of the public square, to ensure that it fits in with the wider masterplanning strategy for the area and to include landscaping design that will attract people to utilise the space during non-match days. A key component of the public realm is the provision of an outdoor play area in the new public square, which will be utilised by the Tottenham Foundation as part of their outreach work, and this has been refined to work in with their requirements.
- **Tottenham Experience / Listed Buildings / Community Safety:** The design of the Tottenham Experience has evolved significantly during the consultation process. The initial design envisaged the removal of all four heritage buildings, including Warmington House, in order to deal with the crowd safety issues and create a new gateway to the site. Following this, an options analysis demonstrated that the retention of the 3 locally listed buildings was the primary contributor to the crowd safety issue of spectators being forced into the bus lane during arrival for a match. The design was changed to incorporate Warmington House, but remove the 3 locally listed buildings resulting in accessibility and public safety benefits.

Rights of Light Consultation

Given the identified socio-economic baseline in Northumberland Park ward, it is likely that the affected parties, including secure tenants, private owners, freeholders, leaseholders, service users, attendees of Places of Worship and schools are more likely to share more protected characteristics under the Equality Act (2010) than average across London, in particular in terms of age, race and religion.

GIA, in coordination with LBH, began approaching potentially affected residents and occupants in June 2015 to explain the effects of the proposed development on Rights to Light. The initial written correspondence included an FAQ on what 'Right to Light' means, how the surrounding area might be affected, and a request to survey each property individually to refine and substantiate the modelled effects. THFC offered each property the opportunity to appoint an independent solicitor and Right to Light surveyor, paid for by THFC, if they so wished.

Following the individual correspondence and follow up visit/contact to outline the description of the proposals, the effects on Right to Light, the

methodology for calculating compensation and the offer of compensation, GIA held two workshops to engage with the affected parties.

At these workshops (the first of which Council tenants were invited to, and the second of which included Right to Buy and other tenants), GIA and LBH offered advice to affected residents and were able to run through the modelled effects and calculation of impacts on-screen. In addition, an independent Right to Light surveyor/advisor was in attendance to answer any queries that participants may have had.

The process has been undertaken transparently, with independent support and advice offered to all affected parties in a non-discriminatory manner. Assessment of impacts and subsequent offers of compensation have complied with all relevant legal standards and guidelines depending on the extent of each individual effect. As such, it is considered that the Council and THFC have acted in compliance with Section 149 duty of the Equality Act (2010).

Stage 8 - Final impact analysis

The analysis identifies that the Northumberland Development Project is anticipated to have significant social and economic benefits for the local area and will have an overall positive impact for communities in the area. Given the profile of the area this will include a large proportion of those with the characteristics protected under the Equality Act.

Some parties will be affected by the development in terms of their right to light. Although the profile of the area suggests the affected parties may include a large proportion of those with protected characteristics, it is not anticipated that the proposal will impact on parties with these protected characteristics disproportionately to others. The affected parties have been engaged throughout the consultation process and offered independent information and support.

The decision to acquire and lease back the site would mean affected parties would lose their injunctionable right, but a scheme of compensation will be implemented to mitigate this impact. Under the scheme of compensation all owners (including the Council as landowner) will be treated equally and fairly, and will have the right of appeal to a Tribunal.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Helen Fisher

Date of review

3rd December 2015

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.