

Equality Impact Assessment

Name of Project	Update to Statement of Community Involvement	Cabinet meeting date If applicable	14 February 2017
Service area responsible	Strategic Planning, Transport & Infrastructure		
Name of completing officer	Clodagh McGuirk	Date EqIA created	13 September 2016
Approved by Director / Assistant Director	Emma Williamson	Date of approval	19/09/2016

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

- **Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act**
- **Advancing equality of opportunity between those with ‘protected characteristics’ and those without them**
- **Fostering good relations between those with ‘protected characteristics’ and those without them.**

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. Clodagh McGuirk (Planning Policy)	5.
2. Emma Williamson (AD Regeneration, Planning and Economy)	6.
3. Equalities / HR	7.
4. Legal Advisor (where necessary)	8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

All local planning authorities are required under section 18(1) of the Planning and Compulsory Purchase Act 2004 to prepare and maintain a Statement of Community Involvement (SCI). The SCI sets out how Haringey Council's Planning Service will involve local residents, local businesses and other key organisations and stakeholders in the plan-making process and in the determination of planning applications.

Haringey's SCI was first adopted in 2008. It was updated in 2011 and now requires a further update to take account of changes in planning legislation and to reflect current practices in community engagement, including greater use of electronic communications such as email and social media.

The legislative changes stem mostly from the introduction of the Localism Act in late 2011, which sought to speed up both plan-making and the time taken to determine planning applications. In particular, it aims to simplify the plan-making process by reducing the number of informal consultation stages and reduce the status of certain types of planning documents making them less onerous to produce or update. At the same time, the Localism Act introduced measures to shift new rights and planning powers to local authorities and local communities. These changes include: a duty on all planning bodies to cooperate on cross boundary planning matters; the ability to introduce a levy on development to help pay for local infrastructure; and the ability for local communities to prepare their own plan for their own local neighbourhood area.

One of the main changes in the updated SCI is that consultation on planning applications is proposed to be reduced back to statutory requirements, as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015. In particular it is proposed that we will no longer send letters to neighbours consulting them on planning applications but rather place a site notice at each site. The Planning Service has forecast a £50,000 MTFS saving for 2016/17 on the back of not sending consultation letters.

This equality impact assessment (EqIA) will provide a focus on the anticipated effects of the SCI for Haringey residents, including those with protected characteristics under the Equality Act 2010. Section 6 of the EqIA puts forward mitigating measures to limit risks of adverse impacts arising from the proposed changes.

--

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 data, including Borough and Ward level profile data http://www.haringey.gov.uk/local-democracy/about-council/facts-and-figures/ward-profiles http://www.haringey.gov.uk/local-democracy/about-council/facts-and-figures/statistics/haringey-census-statistics	Borough and ward level information on <ul style="list-style-type: none"> ▪ Demography ▪ Ethnicity, identity, language and religion ▪ Health ▪ Housing and accommodation ▪ Qualifications ▪ Labour market
Haringey corporate equalities data http://www.haringey.gov.uk/local-democracy/about-council/equalities/equality-impact-assessments-egia	Ward level information on age, gender, ethnicity, religion, disability, marital status
ONS Integrated Household Survey (Experimental Statistics) 2014 http://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/integratedhouseholdsurvey/2015-10-01#sexual-identity	Sexual identity information
Haringey Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna	Health indicators, Indices of Multiple Deprivation

Data about protected characteristics

Age

Haringey has a relatively young population with a quarter of the population under the age of 20, and 91% of the population aged under 65 (compared to 89% for London and 83% for England). Haringey's largest age group is the 30-34 group which makes up 11% of the population. The largest increase in age group between 2001 and 2011 comes in the 40-44 year olds, with a 2.3% increase since 2001. The largest decrease in age group comes in 25-29 year olds, with a 3.6% decrease.

Disability

There is no universal definition of disability. Here we use the Census data on long term health problem or disability and self reported health as a proxy. This shows that 14% of Haringey residents have a long term health problem that limits their day to day activity, lower than England but in line with London.

Gender reassignment

No data is available regarding gender reassignment.

Marriage and civil partnership

The 2011 Census indicated that 33.3% of Haringey residents aged 16 and over are married, while 43.2% of residents aged 16 and over are living as a couple.

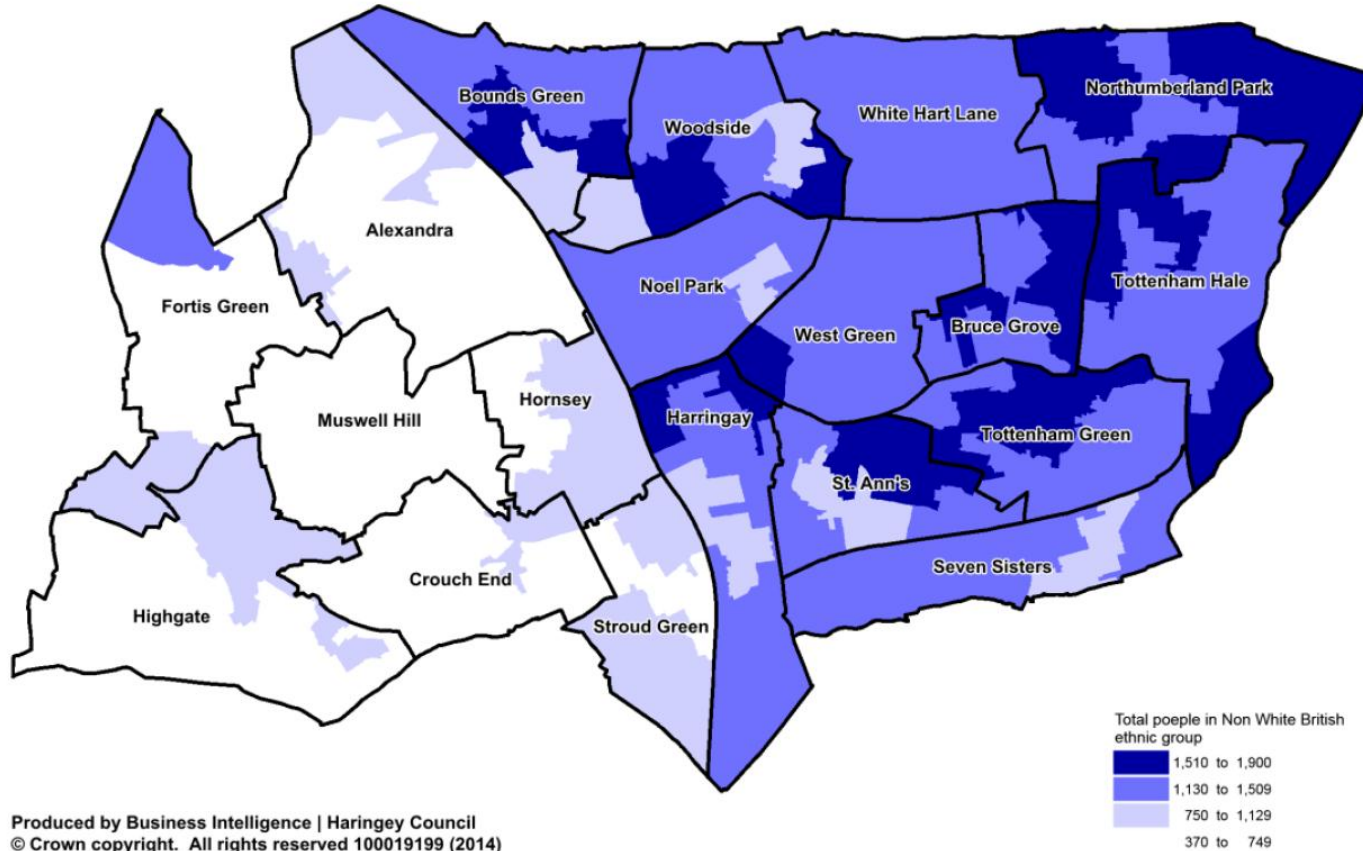
Pregnancy and maternity

Fertility rates measure the rate of live births amongst the fertile population (women aged 15-44 years). The rates in Haringey have increased consistently and there were 478 extra live births between 2002 and 2012. Previously the rates in Haringey were considerably higher than both London and England and Wales but recently it has fallen in line with both London and England. In 2012, fertility rates per 1,000 women in Haringey were 64.7 compared with 67.0 (London) and 64.9 (England). Teenage pregnancy rates at 20.9 per 1,000 have now fallen below the London (21.8 per 1,000) and England (24.3 per 1,000) averages.

Ethnicity

Haringey is the 5th most ethnically diverse borough in the country. Over 65% of residents come from non-White British communities, compared to 20% in England, and 55% for London. Residents in Non-White British ethnic groups tend to be situated in the east of the Borough. The following graph shows the proportion of non-White British ethnic groups across the Borough.

Total people in Non White British ethnic group
 Haringey LSOAs
 2011 Census



Produced by Business Intelligence | Haringey Council
 © Crown copyright. All rights reserved 100019199 (2014)

Religion

Between 2001 and 2011, there was a 5.2% increase in the proportion of Haringey residents who stated they have no religion. The biggest increase in religion comes in the Muslim group, with a 0.3% increase from 3.5% in 2001 to 3.8% in 2011. The biggest decrease comes in the Christian group, with a 7.9% decrease from 48.8% in 2001 to 40.9% in 2011. Haringey has a higher proportion of Jewish residents than London (3% and 1.8% respectively)

Sex

In 2011, there was a shift towards a more equal number of males and females across the Borough, due to an increase in the male population.

Sexual orientation/identity

There is no borough level data for this category, and only London wide data. On the basis of the Integrated Household Survey, the Office for National Statistics (ONS) data suggests that in 2014, 1.6% of adults in the UK identified their sexual identity as lesbian, gay or bisexual. From a regional perspective, London had the highest proportion of adults identifying themselves as lesbian, gay or bisexual (2.6%). The ONS emphasises that the Integrated Household Survey is an experimental data source undergoing evaluation for inclusion in new official statistics.

Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.

Information about other themes likely to affect protected groups

Digital Inclusion

In 2013 the Greater London Authority (GLA) carried out research about internet access across London. Of those over 16, the study found that 94% of the London population had access to internet at home. Of those who access the internet in London 91% of people access the internet every day, or almost every day (UK average 85%). Only 1% of the population in London access the internet less than once a week. In 2015, the GLA carried out further research on internet access and looked into whether people aged 16 and over had ever used or never used the internet by a range of variables including age, ethnicity, pay, occupation, qualifications, and disability. In Haringey, it found that 13.1% of the population had never used the internet. In London for those aged 65-74, 22.7% had never used the internet. This increased to 63.55% for those over 65. Overall only 3.2% of 16-64 year olds had never used the internet. For the male population of London 93.5% of males have used the internet and 89.2% of females. Of those in employment, 98.4% have used the internet and 97.8% of those unemployed. Of those inactive 76.4% have used the internet.

In terms of disability, 74.6% of all disabled people in London have used the internet, 73.3% of DDA disabled and 96.8% of work-limiting disabled. Of those in London from Black or Ethnic Minority groups 91.3% have used the internet (8.7% having never accessed it).

In November 2014 the BBC carried out research to look at digital capabilities across the UK. The basic digital skills threshold is defined as: send and receive emails, use a search engine, browse the internet, and fill out an online application form. It found that in 2014 in London 80% of people have basic online skills, slightly lower than the UK average of 81%. This information was broken down into age groups with 52% of 65+ year olds in the UK not having basic digital skills.

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	Details	None – why?
Sex	Positive (see details)	The SCI is not expected to have a negative impact on this group.	The SCI aims to deliver overall improvements to all groups in the Borough and is not expected to have a negative impact in relation to this protected group.	
Gender Reassignment	Positive (see details)	The SCI is not expected to have a negative impact on this group.	The SCI aims to deliver overall improvements to all groups in the borough and is not expected to have a negative impact in relation to this protected group.	
Age	Positive for those who have digital capabilities. (see details)	Based on digital capabilities the age groups in which a higher percentage of people (52%) do not have basic digital skills are the 65+. In Haringey this age group accounts for approximately 9% of the population. So in Haringey the proportion of 65+ year olds who do not have digital capabilities is approximately 4.68% of the population.	Residents on the Planning Service’s database and who are digitally enabled will be notified directly about planning applications. The emails are clear and provide direct links to relevant information. For those who are not digitally enabled, site notices will be placed in the appropriate locations and provide all relevant information. The format and colour of the notices will be reviewed.	

			<p>Overall, the use of site notices in place of letters will allow more people to be aware of proposed developments which may affect them.</p> <p>The SCI sets out measures to ensure effective engagement with older people as well as young people and children.</p>	
Disability	Positive (see details)	The proposals may impact those who have a disability and are in a single household who are not digitally enabled and/or unable to leave the house, and those who have a disability and are in a household with more than one person who is also not digitally enabled and/or able to leave the house. These are considered to be very small percentages of the population.	The numbers affected by the change in procedure is expected to be small. In addition, the overall benefits from the cost savings of sending letters balances in favour of the change in procedure. The SCI sets out measures to ensure effective engagement with residents with disabilities.	
Race & Ethnicity	Positive (see details)	The SCI is not expected to have a negative impact in comparison to the existing situation.	The Planning service will ensure that site notices and emails are clear and include details of where people can go for further information.	
Sexual Orientation	Positive (see details)	The SCI is not expected to have a negative impact	The SCI aims to deliver overall improvements to all	

		on this group.	groups in the borough and is not expected to have a negative impact in relation to this protected group.	
Religion or Belief (or No Belief)	Positive (see details)	The SCI is not expected to have a negative impact on this group.	The SCI aims to deliver overall improvements to all groups in the borough and is not expected to have a negative impact in relation to this protected group.	
Pregnancy & Maternity	Positive (see details)	The SCI is not expected to have a negative impact on this group.	The SCI aims to deliver overall improvements to all groups in the borough and is not expected to have a negative impact in relation to this protected group.	
Marriage and Civil Partnership	Positive (see details)	The SCI is not expected to have a negative impact on this group.	The SCI aims to deliver overall improvements to all groups in the borough and is not expected to have a negative impact in relation to this protected group.	

Stage 6 - Initial Impact analysis

The changes proposed by the updated SCI, namely the cessation of sending letter notification of planning applications to neighbouring properties, may initially negatively impact on those residents who would have previously have received letters. However, it is expected that the change in procedure will have little or no impact on the response rate to planning applications, which in 2015/16 was 5%, despite the 161,309 consultation letters which were sent. The expected savings from not sending the consultation letters is likely to benefit the service as a whole.

Actions to mitigate, advance equality or fill gaps in information

1) Raising awareness over the changes

To ensure that residents are informed of these changes, we will place notices on Haringey Council’s website and on planning consultation letters before they are phased out, as well as by email to our database of community contacts

2) Options for residents to receive notifications by alternative methods

The Planning Service will undertake an update of its database of community contacts with the ultimate aim of linking this to the Council’s geographic information system and being able to email contacts with planning application notifications. In addition, local residents also have the option to use the ‘Notiz’ smart phone app to be informed of planning applications in their local area.

We will continue to raise awareness over opportunities to receive notifications on planning applications by email or phone.

3) Adjustments to the format of site and email notifications

Publicity of planning applications will meet the standard requirements as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015. Information on site notices, emails, letters (where relevant) and website will include:

- a) the address or location of the proposed development;
- b) a description of the proposed development;
- (c) the date by which any representations about the application must be made, which must not be before the last day of the period of 14 days beginning with the date on which the information is published;
- (d) where and when the application may be inspected;

	<p>(e) how representations may be made about the application; and</p> <p>(f) that, in the case of a householder or minor commercial application, in the event of an appeal that proceeds by way of the expedited procedure, any representations made about the application will be passed to the Secretary of State and there will be no opportunity to make further representations.</p> <p>This information will be presented in an easy to read format using plain English. Site notices will be prominently positioned.</p> <p>4) Safeguards to accessibility of Development Management Forums The format of Development Management Forums is set out in the Council's Planning Protocol 2016. Developers will be expected to conduct these meetings in line with the key principles for effective engagement set out in the Chapter 3 of SCI. The minimum requirements for Development consultation are set out in Chapter 5 of the SCI and states that public meetings will be held in suitable locations and at suitable times of the day. These standards ensure that the process is transparent, effective, inclusive and accountable.</p> <p>5) Monitoring and oversight The effectiveness of the SCI will be monitored annually through the Authority Monitoring Report (AMR). This will assess consultation processes and outcomes and will identify areas in need of change or improvement.</p>
--	--

Stage 7 - Consultation and follow up data from actions set above

Data Source (include link where published)

The updated SCI was consulted for eight weeks from 10th August to 2nd October 2015. The consultation document set out the purpose for the update, the changes since the previous update, and details of how to respond to the consultation.

The aim of the consultation was to seek the views and comments of the public and stakeholders on the proposed updates to enable the preparation of the final version of the document.

The consultation involved press notices, a dedicated webpage on the Haringey website, email and letter notification to the planning consultation database, Twitter campaign, hard copies and relevant information in all public libraries and Civic Centre. In addition, a public consultation event was held on the 14th September 2015 in the Civic Centre.

Public consultation on the document was carried out in accordance with the Council’s adopted Statement of Community Involvement (2011). This included:

- Notification by letter/e-mail on 10th August 2015 to over 16,000 individuals and organisations registered on the planning consultation database;
- Public notice placed in the local newspaper on 14th August 2015;
- The SCI website was updated to include the relevant information relating to the consultation and the document;
- Reference copies of the document were made available in all public libraries, at the Civic Centre and Planning Reception at River Park House, and on the Council’s website;
- Tweets from Haringey Twitter account; and
- A public meeting to discuss the consultation held on 14th September 2015.

There was a relatively low response rate to the consultation, with only eight written responses and seven attendees at the public event.

The consultation outcomes are set out in detail in the SCI consultation statement. The main issues raised in the responses related to consultation with the public on planning applications

What does this data include?

Written responses were received from Historic England, Natural England, Thames Water, Transport for London, Highways England, Kingsley Park Residents Association, Highgate CAAC, and Highgate Society.

The comments included a mix of support, factual corrections and suggestions of significant changes.

The main issue raised at the public meeting related to the need for better communication and feedback. Suggestions were made as how to improve the Council’s methodology.

Those who responded to the consultation are statutory consultees and amenity groups who are actively involved in Planning in Haringey. The Council will use these established networks to widen its engagement during Planning consultations, with the aim to involve harder to reach groups. We will listen to consultation feedback in relation to how we can improve our methods of engagement.

Stage 8 - Final impact analysis

The EqIA shows that protected groups are unlikely to be significantly negatively affected by the changes set out in the Statement of Community Involvement.

The EqIA shows that changes made to replace planning application consultation letters in the post with site notifications and alternative communication methods (email and phone apps) are not expected to have negative impact for the majority of residents. Data gathering has shown that most residents are digitally active and would be able to access email and phone notifications on planning applications. Site notifications can widen awareness of planning applications among the wider community that passes by the site, and not just the adjacent neighbours as per the present letter system.

However, the EqIA has highlighted risks that small minorities of residents may have difficulty in accessing site notifications or via email/phone if reasonable adjustments are not made (including those with limited visual sight, limited mobility, not digitally enabled or those with limited English – could impact on older age groups, those from ethnic minorities and disabilities). Notification information in emails, website and site notices, and letters (where relevant) will be presented in an easy to read format using plain English. Site notices will be prominently positioned. Members of the public can contact the Planning Customer Care Team or the Planning Policy Team for further information on any current or upcoming consultation, or Planning query.

Key to the success of the proposed notification methods, specifically the notification emails to the Planning Service's consultation database and the 'Notiz' smart phone app, is ensuring that people are aware of them and know how to use them. We will therefore have ongoing publicity of the electronic notification system and clear instructions on how to use them. To ensure that residents are informed of the changes, we will place notices on Haringey Council's website and on planning consultation letters before they are phased out, as well as by email to our database of community contacts.

To ensure that the Development Management Forums offer every opportunity for people to access the consultation events, the format of the meetings will be required to meet the standards set out in the Council's Planning Protocol 2016 as well as the key principles for effective engagement set out in the Chapter 3 of SCI, and the minimum requirements for Development consultation set out in Chapter 5 of the SCI. These standards ensure that the process is transparent, effective, inclusive and accountable.

The SCI itself will be monitored on a regular basis. This will ensure that we identify and make any necessary changes and further develop publicity methods to address any identified gaps in access to notifications.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Emma Williamson

Date of review

19/09/2016

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqlA is published in accordance with the Council’s policy.