

## EQUALITY IMPACT ASSESSMENT

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

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

This is known as the **Public Sector Equality Duty**.

In addition the Council complies with the Marriage (Same Sex Couples) Act 2013.

### Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

### Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council’s commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council’s Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Northumberland Park Business Plan (Haringey Development Vehicle Cabinet Report July 2017)
Service area	Regeneration
Officer completing assessment	Adam Hunt, Head of Area Regeneration (North Tottenham)
Equalities/ HR Advisor	Paul Green, Policy and Equalities Officer
Cabinet meeting date (if applicable)	3 <sup>rd</sup> July 2017
Director/Assistant Director	Helen Fisher, Director of Regeneration

## 2. Summary of the proposal

*Please outline in no more than 3 paragraphs*

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

### The proposal

The proposal being assessed is the 'Northumberland Park Business Plan' (NPBP). The NPBP is part of a suite of reports and documentation being considered by Cabinet in July 2017 regarding the establishment of the Haringey Development Vehicle (HDV). The NPBP sets out the key parameters, deliverables, proposals and processes to take forward the regeneration of the Northumberland Park regeneration area.

### Key stakeholders

The key stakeholders who may be affected by the NPBP are:

- Council tenants
- Resident leaseholders
- Non-resident leaseholders
- Private tenants
- Private homeowners
- Tenants within Registered Provider (RP) homes
- Businesses within Council owned premises or land
- Community or third sector organisations operating from Council owned premises
- Northumberland Park Community School
- The Vale Special School
- Lea Valley Primary School
- St. Paul's and All Hallows Church of England Infants and Juniors School

### Decision making route

The NPBP is substantively based on documentation produced by Lendlease through the HDV OJEU procurement process which has been running since January 2016. The NPBP will be considered by Cabinet in July 2017. No land or assets within the remit of the NPBP transfers to the HDV following any July 2017 Cabinet decision.

All housing land within the remit of the NPBP will require a number of further decisions before they transfer to the HDV, including: Cabinet decision to transfer the land (following community consultation on options and plans for the area and a S105 Housing Consultation); Full Council authorisation for the making of an application to the Secretary of State for Communities and Local Government for consent to transfer the land; and the approval of the Secretary of State.

All education land within the remit of the NPBP will require a number of further decisions before they transfer to the HDV, including: Cabinet decision to transfer the land (following community consultation on options and plans for the area) and the approval of the Secretary of State for Education to transfer the land.

All future Cabinet decisions will be accompanied by an equality impact assessment and will ensure decision makers pay due regard to their Public Sector Equality Duty.

**3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?**

Protected group	Service users	Staff
Sex	<ul style="list-style-type: none"> <li>▪ Ward profile data (Census 2011; ONS Indices of Multiple Deprivation)</li> <li>▪ Tenant and Leaseholder demographic information held by the Council's housing management data system</li> <li>▪ Haringey JSNA</li> <li>▪ HaringeyStat, June 2016</li> </ul>	N/A
Gender Reassignment	We do not hold this data. The Equality and Human Rights Commission have published a national estimate.	N/A
Age	<ul style="list-style-type: none"> <li>▪ Ward profile data (Census 2011; ONS Indices of Multiple Deprivation)</li> <li>▪ Tenant and Leaseholder demographic information held by the Council's housing management data system</li> <li>▪ Haringey JSNA</li> </ul>	N/A
Disability	<ul style="list-style-type: none"> <li>▪ Ward profile data (Census 2011; ONS Indices of Multiple Deprivation)</li> <li>▪ Tenant and Leaseholder demographic information held by the Council's housing management data system</li> <li>▪ Haringey JSNA</li> <li>▪ Mosaic 2015 segmentation, (ESA Mental Health claimants/Depression)</li> </ul>	N/A

	<ul style="list-style-type: none"> <li>▪ HaringeyStat, June 2016</li> </ul>	
Race & Ethnicity	<ul style="list-style-type: none"> <li>▪ Ward profile data (Census 2011; ONS Indices of Multiple Deprivation);</li> <li>▪ Tenant and Leaseholder demographic information held by the Council's housing management data system; Haringey JSNA</li> </ul>	N/A
Sexual Orientation	<ul style="list-style-type: none"> <li>▪ ONS Annual Population Data 2016</li> </ul>	N/A
Religion or Belief (or No Belief)	<ul style="list-style-type: none"> <li>▪ Ward profile data (Census 2011; ONS Indices of Multiple Deprivation)</li> </ul>	N/A
Pregnancy & Maternity	<ul style="list-style-type: none"> <li>▪ Census;</li> <li>▪ Data based upon households containing a female parent with a dependent child aged 0-1 years old claiming Housing Benefit or Council Tax Relief, 15/06/2016-14/06/2017.</li> </ul>	N/A
Marriage and Civil Partnership	<ul style="list-style-type: none"> <li>▪ Ward profile data (Census 2011; ONS Indices of Multiple Deprivation)</li> </ul>	N/A

**Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?**

*Explain how you will overcome this within the proposal.*

*Further information on how to do data analysis can be found in the guidance.*

This section will cover two areas of:

1. Demographics
2. Wider socio-economic data

## **1. Demographics**

### **A) Sex**

The percentage of males has increased to 49.8%, the percentage of females has reduced to 50.2%. This is reflective of local and national trends.

There are 1057 lone parent households with dependent children, of which 972 are women. This makes up 92% of all lone parent households being led by a woman, and 8% are led by men. This is 18.8% of all households compared to the borough average of 10.5%. Therefore, the proposals within the NPBP to provide new affordable childcare provision and a new health and well-being centre are particularly relevant.

## **B) Gender Reassignment**

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is not national data collected for this protected characteristic. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK<sup>1</sup>. We will need to consider the inequalities and discrimination experienced for this protected group. For the purposes of this EqlA, we will use the inclusive term Trans\* in order to represent the spectrum of transgender and gender variance.

## **C) Age**

0-19 year old profile by ward<sup>2</sup>

Ward	All ages	0-4	5-9	10-14	15-19	Total 0-19	%
White Hart Lane	13431	1009	1148	1268	1107	4532	33.7%
Northumberland Park	14429	1333	1200	1127	1066	4726	32.8%
Seven Sisters	15968	1464	1421	1225	958	5068	31.7%
Tottenham Hale	15064	1231	1025	1089	1163	4508	29.9%
Bruce Grove	14483	1125	1034	919	1008	4086	28.2%
Alexandra	11795	860	811	730	647	3048	25.8%
Tottenham Green	14580	1083	858	878	891	3710	25.4%
Fortis Green	12488	829	800	864	658	3151	25.2%
West Green	13372	854	809	807	776	3246	24.3%
Noel Park	13939	875	818	823	853	3369	24.2%
Woodside	14514	1017	812	819	769	3417	23.5%
Bounds Green	13725	922	750	732	711	3115	22.7%
St Ann's	14638	1004	795	721	728	3248	22.2%
Hornsey	12659	806	751	598	622	2777	21.9%
Muswell Hill	10784	633	586	596	522	2337	21.7%
Stroud Green	11758	705	518	582	493	2298	19.5%
Crouch End	12395	815	574	477	408	2274	18.3%
Highgate	11632	694	516	506	385	2101	18.1%
Haringay	13272	853	549	473	488	2363	17.8%

Northumberland Park has the second highest proportion of 0-19 year olds in the borough, and with a particularly high number of 0-4 year olds.

In particular, the census found 835 households in Northumberland Park with dependent children and no adult in employment. This is 14.8% of all households and compares with 7.2% for households in Haringey. This is the highest proportion of all Haringey wards. Therefore, not only does the ward have a young population, a disproportionate number of them live in workless households.

<sup>1</sup> <https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review>

<sup>2</sup> Census 2011

### Age profile of Haringey by ward<sup>3</sup>

Ward	All ages	0-19	%	20-64	%	65+	%
Alexandra	11795	3048	25.8%	7575	64.2%	1172	9.9%
Bounds Green	13725	3115	22.7%	9341	68.1%	1269	9.2%
Bruce Grove	14483	4086	28.2%	9183	63.4%	1214	8.4%
Crouch End	12395	2274	18.3%	9013	72.7%	1108	8.9%
Fortis Green	12488	3151	25.2%	7965	63.8%	1372	11.0%
Harringay	13272	2363	17.8%	9909	74.7%	1000	7.5%
Highgate	11632	2101	18.1%	8175	70.3%	1356	11.7%
Hornsey	12659	2777	21.9%	8845	69.9%	1037	8.2%
Muswell Hill	10784	2337	21.7%	7143	66.2%	1304	12.1%
Noel Park	13939	3369	24.2%	9391	67.4%	1179	8.5%
Northumberland Park	14429	4726	32.8%	8565	59.4%	1138	7.9%
St Ann's	14638	3248	22.2%	10149	69.3%	1241	8.5%
Seven Sisters	15968	5068	31.7%	9730	60.9%	1170	7.3%
Stroud Green	11758	2298	19.5%	8653	73.6%	807	6.9%
Tottenham Green	14580	3710	25.4%	9675	66.4%	1195	8.2%
Tottenham Hale	15064	4508	29.9%	9384	62.3%	1172	7.8%
West Green	13372	3246	24.3%	8854	66.2%	1272	9.5%
White Hart Lane	13431	4532	33.7%	7769	57.8%	1130	8.4%
Woodside	14514	3417	23.5%	9864	68.0%	1233	8.5%

In regards to the wider population, Northumberland Park has the second lowest proportion of 20-64 year olds and third lowest 65+ year olds. This means that Northumberland Park has a young population and decisions which are likely to impact on the ward's residents will have a greater impact on children and young people aged 0-19.

<sup>3</sup> Census 2011

### **D) Disability**

In the 2011 Census, the following was reported in regards to those who experience limitations on day-to-day activities as a result of a disability or disabilities:

	Northumberland Park	Haringey	London	England and Wales
Day-to-day activity limited a lot	8.1%	6.8%	6.7%	8.3%
Day-to-day activity limited a little	8.6%	7.2%	7.4%	9.3%
Day-to-day activity not limited	83.3%	86.0%	85.8%	82.4%
Day-to-day activity limited a lot: Age 16-64	5.0%	3.8%	3.4%	3.6%
Day-to-day activity limited a little: Age 16-64	5.9%	4.6%	4.2%	4.6%
Day-to-day activity not limited: Age 16-64	54.2%	62.4%	61.5%	56.5%

Northumberland Park has proportionally more residents who have impairments that impact on their ability to do day-to-day tasks. In particular, the ward has the highest proportion of residents in Haringey who have impairments which limit their abilities to do day-to-day tasks a little. We are not able to determine the types of disability from this data, but will need to consider the needs of different disabled people, including the type of reasonable adjustment provided. This includes physical impairments, sensory impairments, mental health issues and Learning Disabilities.

### **E) Race/Ethnicity<sup>4</sup>**

	Northumberland Park	Haringey	London	England
White; English/Welsh/Scottish/N.Irish/British	16.59%	34.68%	44.89%	79.75%
White Irish	1.66%	2.75%	2.15%	0.98%
White; Gypsy or Irish Traveller	0.12%	0.15%	0.10%	0.10%
White; White Other	20.73%	22.97%	12.65%	4.58%
Mixed; White and Black Caribbean	2.68%	1.90%	1.46%	0.78%

<sup>4</sup> Census 2011, rounded to 2 decimal figures

Mixed; White and Black African	1.65%	1.02%	0.80%	0.30%
Mixed; White and Asian	0.92%	1.47%	1.21%	0.63%
Mixed; Other mixed	2.06%	2.10%	1.45%	0.53%
Asian/Asian British; Indian	1.34%	2.33%	6.64%	2.62%
Asian/Asian British; Pakistani	0.51%	0.75%	2.74%	2.10%
Asian/Asian British; Bangladeshi	1.50%	1.73%	2.72%	8.23%
Asian/Asian British; Chinese	0.99%	1.47%	1.52%	0.72%
Asian/Asian British; Other Asian	3.45%	3.19%	4.88%	1.55%
Black African	22.00%	9.04%	7.02%	1.8%
Black Caribbean	13.54%	7.10%	4.22%	1.1%
Black Other	4.80%	2.63%	2.08%	0.52%
Other Ethnic group; Arab	0.93%	0.87%	1.30%	0.42%
Other Ethnic group; Any Other Ethnic	4.53%	3.85%	2.14%	0.62%

Northumberland Park has a lower proportion of residents who define themselves as White British, compared to Haringey, London and the national average. There are 20.73% defined as 'White Other', which is likely to include East European communities. This is lower than the Haringey average of 22.97% but significantly more than the London and national average. It is likely that this population has also grown since the 2011 census. There are also significant Black African, Caribbean and Black British communities in the ward, and are aware of Turkish communities. This is compared to the borough, London and the national average. Any decision that impacts on the whole of Northumberland Park will therefore be likely to impact on these communities disproportionately.

## **F) Sexual Orientation**

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the Census. However, the ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15<sup>th</sup> largest LGB community in the country.<sup>5</sup> We will need to ensure that the inequalities and discrimination experienced by LGB people are considered throughout this EqlA.

<sup>5</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>



## **G) Religion<sup>6</sup>**

	<i>Northumberland Park</i>	<i>Haringey</i>	<i>London</i>	<i>England and Wales</i>
Christian	50.6%	45.0%	48.4%	59.3%
Buddhist	1.0%	1.1%	1.0%	0.4%
Hindu	1.1%	1.8%	5.0%	1.5%
Jewish	0.2%	3.0%	1.8%	0.5%
Muslim	24.2%	14.2%	12.4%	4.8%
Sikh	0.2%	0.3%	1.5%	0.8%
Other religion	0.3%	0.5%	0.6%	0.4%
No religion	13.2%	25.2%	20.7%	25.1%
Religion not stated	9.2%	8.9%	8.5%	7.2%

Northumberland Park has a comparatively high proportion of Christians, higher than Haringey and London. There is also a larger Muslim population than the rest of Haringey, London and national averages. Consultation processes to develop firm plans for the area will need to have due regard to diversity issues relating to these communities (including how we engage with women in certain communities). If, following future master planning processes, any religious buildings are included in any regeneration proposals then full EqlAs will be undertaken.

## **H) Pregnancy and maternity**

	<b>Births (No.)</b>	<b>Crude Live Birth rate</b>		
	<b>Haringey numbers</b>	<b>Haringey</b>	<b>London</b>	<b>England</b>
2002	3731	17.2	14.7	11.4
2003	3890	17.3	15.0	11.8
2004	4017	17.9	15.4	12.1
2005	4026	17.9	15.6	12.1
2006	4076	18.2	16.1	12.5
2007	4325	19.2	16.7	12.8
2008	4289	19.0	16.6	13.0
2009	4193	18.6	16.7	12.9
2010	4456	19.8	17.0	13.2
2011	4227	16.5	16.2	13.0
2012	4209	16.3	16.2	13.0

Haringey has a higher birth rate compared to London and England. As Northumberland Park has the second highest number of 0-4 year olds in the borough, it is likely that the birth rate is disproportionately higher in Northumberland Park. Based upon total claimant data, the number households where a female has a dependent child aged between 0-1 years old, Northumberland Park has 74 claimants, the second highest ward claimants in the borough<sup>7</sup>

<sup>6</sup> Census 2011

<sup>7</sup> Data based upon households containing a female parent with a dependent child aged 0-1 years old claiming Housing Benefit or Council Tax Relief, 15/06/2016-14/06/2017.

Therefore, decisions within the NPBP will need to consider the needs of pregnant women and mothers with young children as they are likely to be disproportionately affected.

### **1) Marriage and civil partnership**

In 2011 there were 10 couples in a civil partnership in Northumberland Park. This is compared to 1,651 marriages (which was only available to heterosexual couples at the time). All elements of the NPBP will need to ensure all couples in a civil partnership are treated exactly the same as couples in a marriage.

## **2) Wider socio-economic data**

Set out below are the four themes underpinning the programmes and deliverables contained within the NPBP alongside key data sets and how the development and delivery of the NPBP will impact on key characteristics and actions to mitigate any negative impacts.

### **a. Better Prospects**

#### **i) Employment**

Employment and unemployment<sup>8</sup>

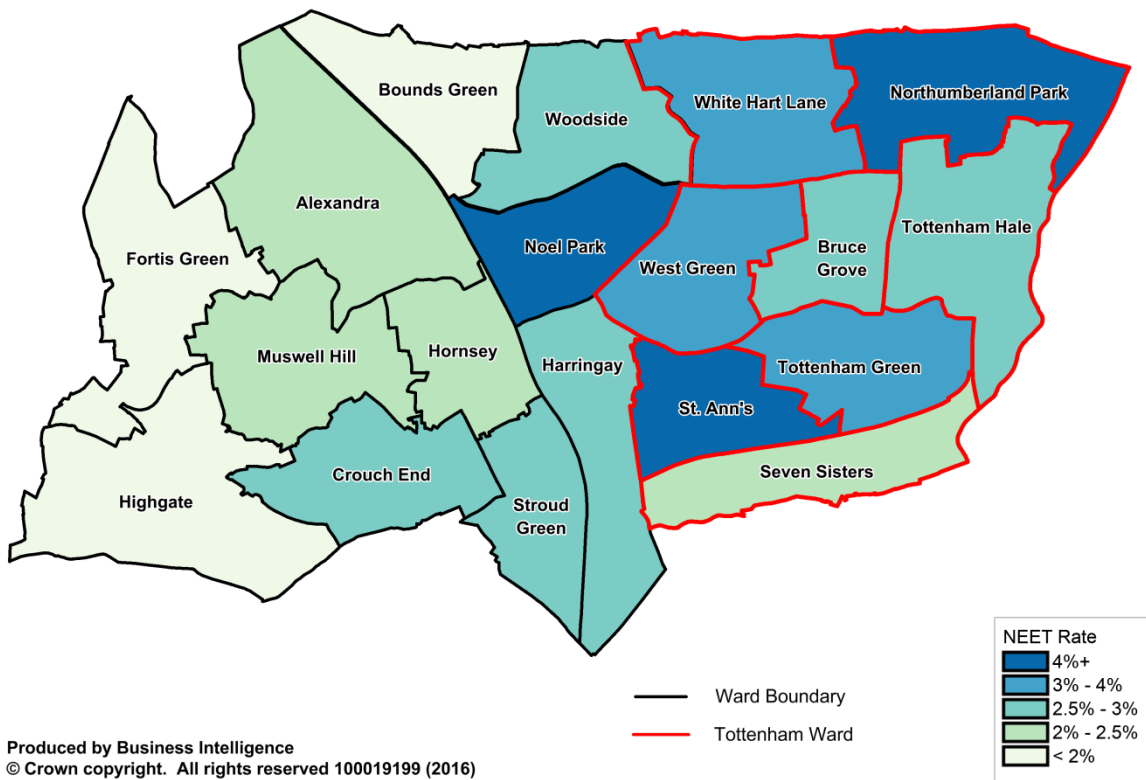
	Northumberland Park	Haringey	England and Wales
<b>Economic Active</b>	<b>65.1%</b>	<b>75.2%</b>	<b>76.8%</b>
Males	71.7%	80.1%	82.0%
Females	58.7%	70.2%	71.7%
<b>In Employment</b>	<b>52.3%</b>	<b>67.5%</b>	<b>71.0%</b>
Males	56.8%	71.6%	75.1%
Females	48.0%	63.5%	66.9%
<b>Unemployment</b>	<b>19.6%</b>	<b>10.2%</b>	<b>7.6%</b>
Males	20.8%	10.6%	7.6%
Females	18.2%	9.7%	6.8%

As demonstrated above using the Census data, Northumberland Park residents are significantly less likely to be economically active (65.1% compared to 75.2% for the borough) or in employment (52.3% compared to 67.5% for the borough average)<sup>9</sup>.

There is a particular inequality experienced by women with women less likely to be economically active (58.7% compared to 71.7% for men) and less likely to be in employment (48% of women in Northumberland Park are in employment while 56.8% of men are in employment). Based upon the data in the demographics section, this is likely to include a disproportionate number of lone parent households headed by women.

<sup>8</sup> Census 2011

**Proportion of 16-17 year olds Not in Employment, Education or Training (NEETs) by Ward as at December 2015**



Northumberland Park has some of the highest level of NEETs in the borough. This is likely to reflect the younger population that live in Northumberland Park. In addition to this, it is likely to be an inequality that is experienced by particular BAME communities who live in the borough, as well as disabled people and people of different religions or faiths as identified in the demographics section.

To overcome these inequalities, the NPBP has committed to deliver thousands of new jobs and training opportunities through employment programmes linked to both the construction and the end uses of the regeneration programme, the delivery of new education provision through an all-through school and the delivery of youth focused training programmes.

Consideration will be needed to ensure that these schemes are fully accessible to these groups, such as offering reasonable adjustments for disabled people, and support female lone parent families' accessing the Skills and Employment Hub.

**ii) Schools**

The NPBP envisages the delivery of new, larger education facilities which include SEN provision. The detail of the operating model of the school, phasing and timing of the delivery of the new school is a matter for detailed discussion with, and leadership by, the schools themselves.

The schools that will potentially be impacted by this element of the decision are Northumberland Park Community School and The Vale. Below sets out the details of protected groups that attend the school. While these populations will not be immediately reflected, it is likely that these groups will be impacted by this element of the decision.

### **Northumberland Park Community School**

Northumberland Park Community School has a roll count of 1027. The 2016 School Census reported the following protected characteristics<sup>10</sup> :

- 55.4% are boys, compared to the national average of 50.7%. 44.6% are girls, compared to the national average of 49.3%.
- 57.4% of pupils are eligible for Free School Meals. This compares to 29.3% nationally
- 2.8% have a statement of Special Educational Needs (SEN) or Education, Health and Care (EHC), compared to the national average of 3.9%.

### **Ethnicity**

	<b>Percentage of students</b>
<b>White British</b>	5.4%
<b>White Irish</b>	0.8%
<b>Irish Traveller</b>	0.2%
<b>Other White Background</b>	43%
<b>Gypsy/Roma</b>	1.2%
<b>White/Black Caribbean</b>	2.4%
<b>White/Black African</b>	2%
<b>White/Asian</b>	0.3%
<b>Other mixed</b>	3.2%
<b>Indian</b>	0.7%
<b>Pakistani</b>	0.6%
<b>Bangladeshi</b>	2.3%
<b>Other Asian</b>	0.2%
<b>Black Caribbean</b>	6%
<b>Black African</b>	22.2%
<b>Other Black</b>	1.2%
<b>Chinese</b>	0.1%
<b>Other ethnicity</b>	8.2%

76% of pupils have a first language that is not English, compared to the national average of 15.7%.

While we appreciate that the pupil population will change by the time any changes to the schools commences, at present the groups that are most likely to be disproportionately impacted are:

- Other White population, which is likely to be Eastern European communities
- Black African communities
- Boys
- Children who are entitled to Free School Meals.

### **The Vale<sup>11</sup>**

The Vale school is a Special Educational Needs school and therefore pupils will have an identified educational need based upon disability. The total roll count in 2016 was 94.

The breakdown by protected characteristic includes:

- 54.3% of the student population are girls compared to the national average of 49.3%. 45.7% are boys, compared to the national average of 50.7%
- 83% of students have a SEN or EHC Plan, compared to 3.9% national average, a reflection of the SEN status of the school

<sup>10</sup> <https://www.compare-school-performance.service.gov.uk/school/102155?tab=absence-and-pupil-population>

<sup>11</sup> <https://www.compare-school-performance.service.gov.uk/school/102176>

- 53.8% are eligible for Free School Meals, compared to the national average of 29.3%

#### Ethnicity

Ethnicity	Percentage of students
White British	11.1%
White Irish	0%
Irish Traveller	1.2%
Other White Background	16%
Gypsy/Roma	1.2%
White/Black Caribbean	4.9%
White/Black African	0%
White/Asian	1.2%
Other mixed	13.6%
Indian	1.2%
Pakistani	0%
Bangladeshi	1.2%
Other Asian	0%
Black Caribbean	12.3%
Black African	19.8%
Other Black	3.7%
Chinese	0%
Other ethnicity	11.1%

Black African, Black Caribbean and Other Mixed are the main ethnic groups who are representative in the school population.

Mitigating impacts on protected groups and the wider community will play a key role in the development of proposals for the new education facilities and a full, detailed EqIA process will accompany any future decisions (Cabinet and Secretary of State Consent) regarding these proposals. Decisions on future proposals, including the model of SEN provision will follow a thorough engagement process with staff, parents, carers and students. Whilst no decision has been made as to the schools relocation or the SEN model (including whether additional SEN capacity is provided), due regard will need to be given in any new school to particular issues affecting SEN students, including the amount of space provided, the distance to be travelled by students and their parents / carers to access the facilities and the level of car parking or set down provision for this key group. Of particular importance for both the SEN and mainstream provision is the development of a phasing strategy which ensures that there is no unacceptable delay in the opening of any new provision before any existing school is closed.

While Northumberland Park Community School and The Vale are regarded as 'Good' by Ofsted, there are inequalities in terms of outcomes, as a result of the levels of deprivation in the surrounding areas. Northumberland Park Community School achieved 44% pass rate for English and Maths compared to the national average of 63% in 2016. However, the school performs better under the 'Progress 8' with 0.25 compared to the nation average of -0.03. 3 out of 10 Northumberland Park Community School students leave school with no qualification.

This therefore means there are educational outcome inequalities for the groups identified above, including 'Other White' and 'Black African'. In addition to this, boys and disabled students are also likely to experience educational inequalities as they are over represented in the schools.

The HDV provides opportunities to develop more employment and educational pathways, as set out in the Employment section and the Social and Economic Business Plan.

### iii) Businesses

The NPBP sets out proposals to increase the number of businesses in Northumberland Park whilst ensuring these businesses are authentic to the local community and demographic.

Within the red line regeneration boundary which will be the context for future master planning are a number of local retail premises, specifically on Northumberland Park road and Park Lane. Set out below are details of the businesses on Park Lane as, given they are Council owned premises, they are more likely to be affected by future regeneration or development proposals. However, there is no decision yet on whether there are any changes.

Address	Premises Title	Function
161, Park Lane, Tottenham, London, N17 0HJ	Four Sisters Restaurant	Restaurant - Caribbean
163, Park Lane, Tottenham, London, N17 0HJ	Northumberland Park Residents Association	Community Services
165 - 167, Park Lane, Tottenham, London, N17 0HJ	Grace Pharmacy	Chemists Dispensing
169, Park Lane, Tottenham, London, N17 0HJ	The Olive Branch	Pub
177, Park Lane, Tottenham, London, N17 0HJ	London Borough Of Haringey Neighbourhood Resource Centre	Community Centre
185, Park Lane, Tottenham, London, N17 0HJ	Tasties	Restaurant - Caribbean
187, Park Lane, Tottenham, London, N17 0HJ	Top Press Dry Cleaners	Dry Cleaners
189, Park Lane, Tottenham, London, N17 0HJ	VOID	VOID
191, Park Lane, Tottenham, London, N17 0HJ	Hasal Catering Ltd	Catering equipment supplier
193, Park Lane, Tottenham, London, N17 0HJ	Cressey's News	Newsagents
195B Park Lane, Tottenham, London, N17 0HJ	Four Sisters Internet cafe	Internet Cafe/ Printers
195A Park Lane, Tottenham, London, N17 0HU	Adwoak's Unisex Salon	Hairdressers / Barbers (afro-caribbean)

The Business Strategy within the NPBP sets out proposals for new employment, office, creative and retail space in Northumberland Park. In terms of employment and employment space the NPBP sets out that “Investing in the local labour market’s preparedness, knowledge and skills is the cornerstone of developing an employable and competitive workforce”. It also creates pathways for residents to access employment opportunities beyond construction which is a fundamental route out of long-term and multigenerational poverty. Through Northumberland Park, HDV has a unique opportunity to create the physical places and the targeted programmes to give residents this opportunity.

The objective of the employment space strategy at Northumberland Park is to:

- Motivate, inspire and support people with their learning development;
- Provide opportunities to progress to higher education and into employment;
- Deliver the Authority's objective of driving growth and employment from which everyone can benefit;
- Address key barriers to finding and sustaining employment; harness connectivity improvements to central London and Stanstead to drive employment growth;

- Provide employment opportunities, that are accessible to local residents of all capabilities and ages, within a retail, commercial, and workspace offer;
- Foster local enterprise, for businesses to start-up, succeed and grow, within the retail and creative workspace offer to build on Tottenham's pilot Creative Enterprise Zone;
- Create a vibrant mixed-use quarter that will bring life and enhance place-making outcomes for the community.

The objective of the commercial offer at Northumberland Park is to provide:

- Employment opportunities for existing local residents with relatively low educational attainment and workplace skills;
- Start-up opportunities for local businesses with a particular focus on creative industries;
- A campus that will attract new businesses or tertiary education establishments to the area who will benefit the economy with increased local spend, and whose employees will become purchasers or tenants of the new market housing;
- A mixed-use environment with a day-time economy, that will increase the life and vitality of place, and help drive the viability of the local retail offer, and thus the attractiveness to residential purchasers and tenants.

In terms of creative and cultural businesses, the NPBP proposals include a Creative Business Hub that would work in conjunction with existing Haringey policy and employment areas to provide supplementary facilities for local businesses. The HDV will also partner with:

- Local agents and charities to promote individual studio units to creative businesses across the borough and beyond. The units will be sized to be affordable with shared facilities, and will be offered on flexible terms, including short-term leases; and
- A specialist management organisation for the operation of the co-working hub such as the Trampery, The Brew, i2 Office, Net.Works. or CANN Mezzanine, who will sub-lease to small businesses and independent workers.

In terms of pricing for the Creative Business Hub, the NPBP commits to keeping rents low in order to attract a critical mass of occupation and establish the hub within the north London creative scene. In terms of marketing, the NPBP commits the HDV to work with the London Enterprise Action Panel to specifically target local creative industries. Co-working space will be marketed approximately 12 months prior to completion of the construction works. The majority of occupiers for the units are likely to be local independent businesses, with marketing activities occurring three to six months prior to handover.

In terms of the Retail Strategy, the NPBP states that "HDV will seek to grow local businesses through the meanwhile use of existing vacant retail premises on Park Lane, such that they can then expand into the permanent retail offer as this becomes available. We will partner with local London-focused agents to attract the right calibre of new tenants, and handpick the best of the emerging Haringey and north-London independent businesses to open premises on Park Lane or the green spine." It will be important to ensure that this selective focus on new retail premises complies with all necessary equality legislation, and therefore help foster good relations with different protected groups.

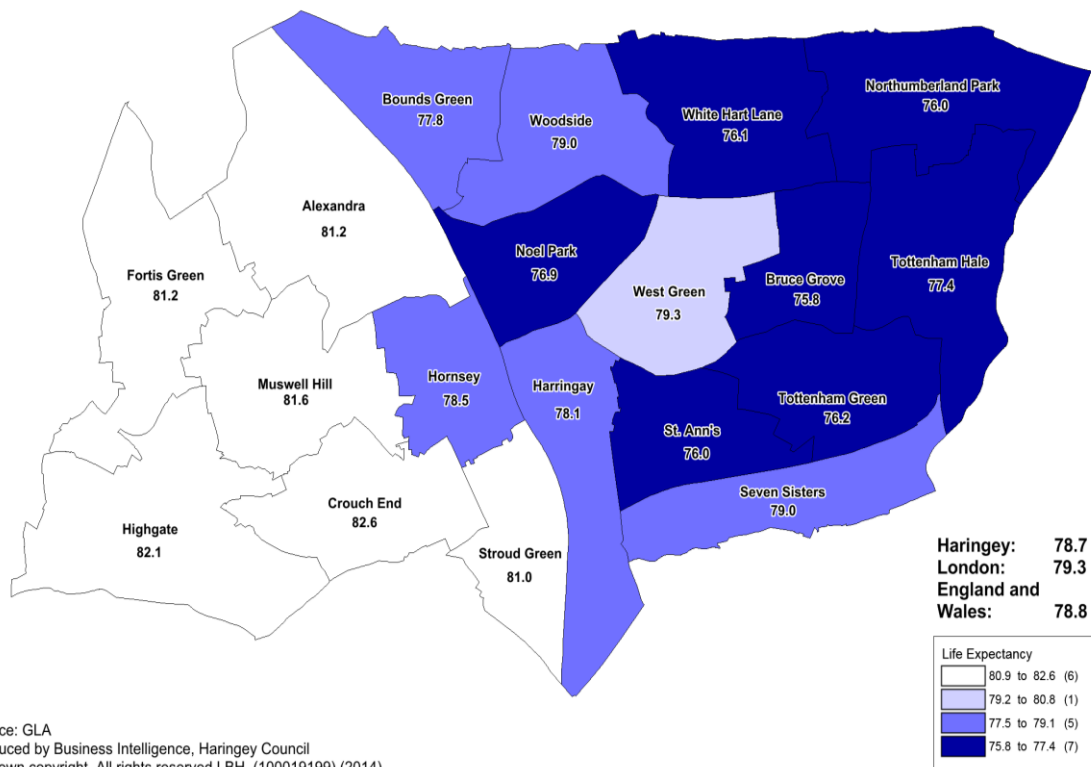
The delivery of the following key objectives within the NPBP is also essential:

- An improved but socially inclusive offer that supports new and existing local businesses, and provides employment opportunities for local residents;
- Working with existing businesses (both within and outside of the draft plan boundary), to undertake physical and management improvements that will enhance their offer;

Any future proposals that affect these businesses will need to consider whether there is any disproportionate impact on any protected characteristics as well as how the overall Business and Retail Strategy is mitigating these impacts.

In order to do this, we will develop a Business Charter, to be agreed by the HDV Board via the annual Business Plan review process, that commits to no negative impacts on businesses affected by the NPBP where a key public function or specific cultural offer is delivered to ensure we maintain our diverse communities.

**b. Healthy Lives**

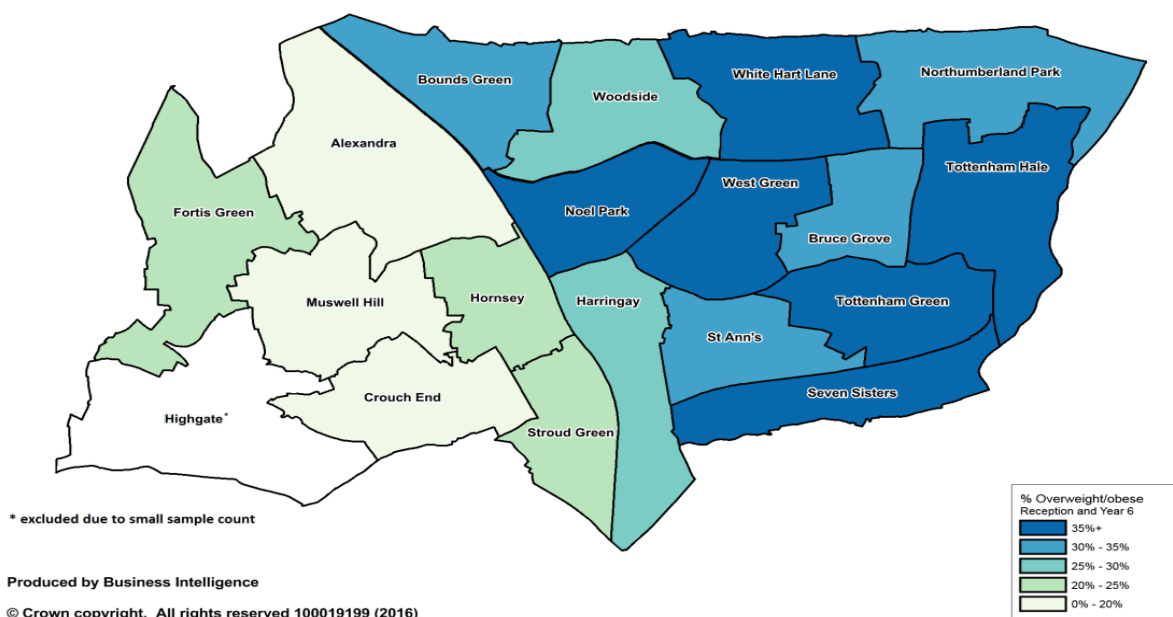


Source: GLA  
 Produced by Business Intelligence, Haringey Council  
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Haringey has a lower life expectancy (78.7 years) than the rest of London (79.3 years) and England and Wales (78.8 years). However, there is a significant difference between the east of the borough to the west of the borough, where there is greater social deprivation and greater ethnic diversity. We therefore expect that there is an inequality for BAME communities living in the east of the borough, in particular Northumberland Park.



National Child Weight Measurement Programme 2015/16  
Haringey Reception and Year 6 Students



A year 6 child living in the east is 2.5 times more likely to be overweight or obese than a peer living in the west. We therefore expect for particular BAME communities to more likely experience obesity, therefore creating wider health inequalities as they get older. Northumberland Park has one of the higher rates of childhood obesity in the borough.

North Tottenham has an under-supply of community healthcare infrastructure. The Tottenham Area Action Plan, which informs regeneration proposals set out in the NBPB, calls for new primary health care facilities in Northumberland Park and the Tottenham Strategic Regeneration Framework Delivery Plan identifies the need to:

*"Use the opportunities of the physical regeneration process to redesign and improve the quality of health services delivered in the community, including physical facilities and GP practices that are failing. This will involve redesigning the way primary care services are delivered around patients, taking into account the rising levels of long-term conditions."*

Improved access to primary care, reduced A&E admissions, and better management of long-term conditions are identified as key outputs.

In the most extreme planning scenario, there will be a shortfall of health care provision for 22,880 patients in the area by 2026, which will necessitate a new health care facility of circa 600–1,000sqm. Other identified needs include:

- Dental health care: lack of existing provision in the area;
- Mental health care: mental illness is at critical levels in the ward; and
- Affordable child care: there is a high instance of unemployed lone family households, especially female headed lone parent families.

The NBPB includes proposals to work with stakeholders to develop new health facilities that respond to these needs. The health and wellbeing offer will meet the objectives of the Council's Health and Wellbeing Strategy, which sets out the three objectives of reducing obesity, increasing healthy life expectancy and increasing mental health and wellbeing.

The health and wellbeing offer in Northumberland Park will empower people to improve their own health and wellbeing, enabling families to participate in sport, leisure and physical activities. It will catalyse a behavioural change amongst residents to promote healthy lifestyles that will counter growing levels of obesity and mental health issues, and reduce reliance on healthcare services.

For example, by designing the public realm to be cycling and walking friendly, we can encourage people to cycle and walk. This will help tackle the inequalities in obesity which impacts on wider health outcomes, but also make the public realm feel safer and encourage different groups to participate in wider society.

The NPBP also includes schemes such as bike doctors and workshops to encourage people to cycle. Consideration will be needed to understand which groups are less likely to cycle and exploration of what the barriers are there to taking up cycling.

The key objectives of the health and wellbeing offer of the NPBP are to:

- Engender community pride through the creation of a community heart; a vibrant melting pot of ages, affluence and ethnicity; a place to make connections, find a purpose or make a friend;
- Engender a behaviour change to adopt healthy lives through the provision of primary health care services that satisfy the forecast under-supply, co-located with affordable fitness facilities;
- Drive better prospects for the residents through the creation of greater job opportunities, provision of affordable child care and access to free Wi-Fi; and
- Improve safety by the creation of a civic gateway to the regeneration, a refuge from concerns, and a place to draw strength and support.

The NPBP sets out proposals for a Northumberland Park Health and Wellbeing Centre that would bring transformational improvements to the health and wellbeing of local residents. Located at the centre of Northumberland Park (although any location would be subject to future master planning and decisions by the Health partners, which will be accompanied by a full EqIA), geographically, socially and culturally, it would provide a focal point for social and economic change; uniting the whole community, existing and new.

The Centre would provide innovative health and social care in one location with a programme of activities founded on the core social and economic needs identified in Haringey policy documents, community consultation and dialogue meetings including:

#### Community:

- A community hub for the regeneration;
- 0-5 year old affordable nursery care to address an existing shortfall in the area, benefiting lone parent families; and
- Community café with free Wi-Fi.

#### Health Centre:

- GP surgery;
- Dental surgery; and
- Flexible counselling rooms;

#### Wellbeing Centre:

- In conjunction with the school leadership an option could be considered to house the 25m swimming pool within the Wellbeing Centre (to replace the existing Northumberland Park Community School and The Vale School pool);

- Affordable gym; and
- Sports studios;

**Homes:**

- Potential for Sheltered housing with direct access to, and support from, the health centre.

A full EqIA will be undertaken in the development of a Health and Wellbeing Centre. This will incorporate the health inequalities and issues that are experienced by Northumberland Park residents.

In addition to this, the NPBP retail strategy that will be adopted will promote businesses (via tenant selection) that promote healthy eating and life styles (thereby reducing the number of unhealthy takeaway options in the area), which will help reduce inequalities caused by obesity.

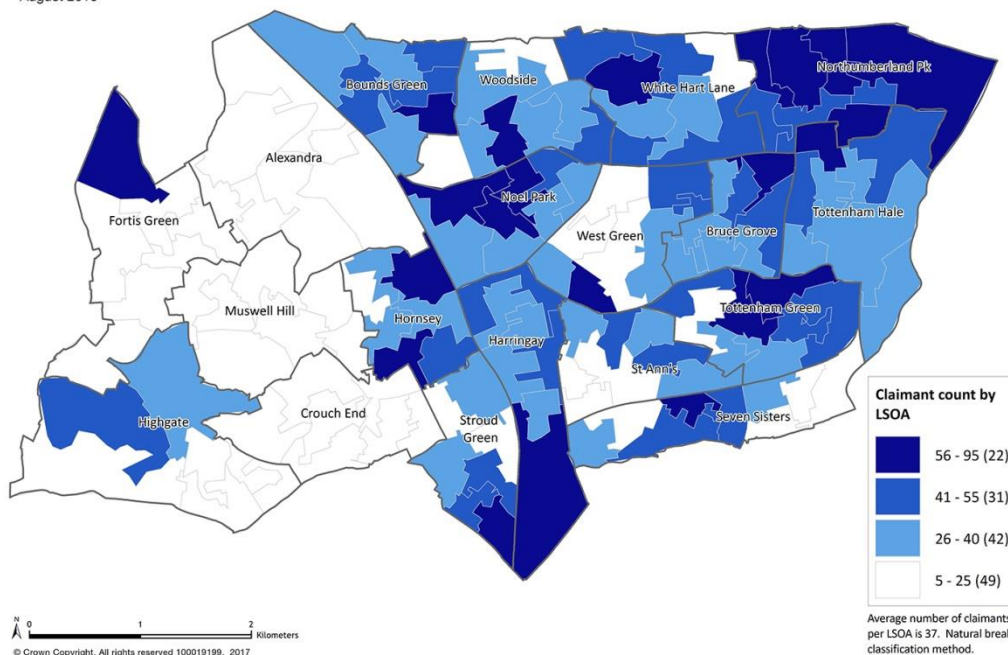
**Mental Health**

It is widely recognised that Northumberland Park has higher than average prevalence of residents with mental health conditions. The Haringey Health and Wellbeing Strategy identified young, single men and BAME communities as most vulnerable to mental health issues, which is likely to be a trend in Northumberland Park.<sup>12</sup>

Evidence for this includes:

**Benefit claimants - employment and support allowance mental health claimants (to August 2016)**

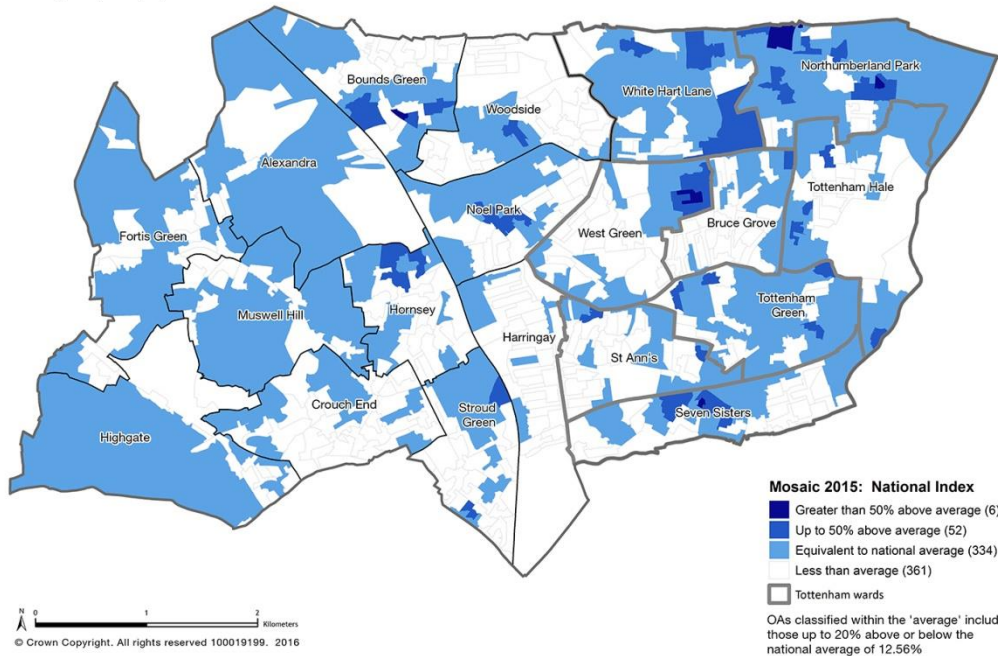
Benefit claimants - employment and support (ESA) mental health claimants  
August 2016



<sup>12</sup> <http://www.haringey.gov.uk/social-care-and-health/health/health-and-wellbeing-strategy>

**Estimated proportion of the population who suffer from depression - This is based on the latest Mosaic 2015 segmentation data and displayed as an index, benchmarked against the national average**

Mosaic 2015: Estimated proportion of the population who suffer from 'Depression'  
Source: Target Group Index (TGI)



Whilst the determinants of mental health will be varied and subject to change, it is clearly influenced by factors such as good quality housing, access to jobs and training and the quality of the living environment that the NPBP will be able to influence in a positive way.

The regeneration programme will also engender uncertainty and change for local residents over a period of years – including the scenario where residents are being rehoused (potentially more than once). A Housing Needs Assessment process will be adopted in any estate renewal and rehousing programme. This will tailor the needs of the individuals and families being rehoused to ensure their needs are met. Through this process, consideration will be needed to minimise impact on people with mental health conditions, such as depression and anxiety.

**c. Community Pride**

**Housing**

The NPBP includes the estate renewal of the Northumberland Park Estate. This is to provide new housing. Within the red line regeneration area that the NPBP is focused on, there are:

- 977 Council tenanted homes
- 340 Council leasehold homes
- 649 Private freehold homes

The analysis below focuses on the Council tenant and leasehold properties as the inclusion of any private freehold interests within any regeneration plan will be a matter for a future master planning process to determine (and subsequent EqIA processes). These groups will be impacted by any Estate Renewal undertaken to Northumberland Park Estate (NPE).

• Age<sup>13</sup>

	<b>NPE Tenants (%)</b>	<b>NPE leaseholders (%)</b>	<b>Northumberland Park Ward</b>
0-19	1 (0.1%)	-	4726 (32.8%)
20-64	776 (79%)	85 (25%)	8565 (59.4%)
65+	198 (20%)	5 (1%)	1138 (7.9%)
Unknown	2 (0.2%)	250 (74%)	

The data above reflects the age range of tenants and leaseholders on the Northumberland Park Estate compared to the ward population. There are a greater proportion of people over 65 who are Council tenants on the Northumberland Park estate compared to the ward average.

This data does not represent children and young people up to the age of 19 years old because they do not hold the tenancies themselves. However, we expect a large proportion of the 20-64 year old age group to have children because, as outlined above, Northumberland Park has a comparatively younger population. In addition to this, there is a disproportionate number of female headed lone parent families.

We are missing a large proportion of information relating to the age of leaseholders, but we expect them to be older because they have had more opportunities to purchase properties and obtain private financial support in doing so. Leaseholders will be offered the right to return under a similar arrangement as tenants, which will be beneficial for older people who are retired or close to retirement and cannot obtain a mortgage to buy a new property

Through the Housing Needs Assessment process, we will ensure the needs of families and housing needs of different age groups are considered. This will help inform a subsequent EqIA for the estate renewal of Northumberland Park Estate.

**Overcrowding and impact**

Further analysis has been conducted on overcrowding and its impact on households with children under five and under eighteen years old:

**Tenancies with children under 5 years old<sup>14</sup>**

<b>Size of unit</b>	<b>Over or Under occupied</b>	<b>Total</b>
1 bed	adequate number of bedrooms	10
	overcrowded by 1 bedroom	53
2 bed	overcrowded by 2 or more bedrooms	10
	underoccupying by 1 bedroom	1
	adequate number of bedrooms	2
3 bed	overcrowded by 1 bedroom	9
	overcrowded by 2 or more bedrooms	4
	underoccupying by 1 bedroom	1

<sup>13</sup> Tenant and Leaseholder data of Northumberland Park

<sup>14</sup> Tenant and Leaseholder data of Northumberland Park

	overcrowded by 2 or more bedrooms	1
Total		91

**Tenancies with children under 18 years old<sup>15</sup>**

Size of unit	Over or Under occupied	Total
1 bed	adequate number of bedrooms	64
	overcrowded by 1 bedroom	65
	overcrowded by 2 or more bedrooms	8
	underoccupying by 1 bedroom	7
2 bed	adequate number of bedrooms	29
	overcrowded by 1 bedroom	66
	overcrowded by 2 or more bedrooms	7
	underoccupying by 1 bedroom	1
3 bed	adequate number of bedrooms	7
	overcrowded by 1 bedroom	16
	overcrowded by 2 or more bedrooms	12
	underoccupying by 1 bedroom	1
4 bed	adequate number of bedrooms	3
	overcrowded by 1 bedroom	3
	overcrowded by 2 or more bedrooms	7
5 bed	overcrowded by 1 bedroom	1
	overcrowded by 2 or more bedrooms	4
Total		301

The data shows us that in the existing stock there are particular issues with overcrowded accommodation for children living in 1 bed and 2 bed properties. Any future development proposal will need to ensure a full Housing Needs Assessment is undertaken and then new homes provided which are suitable for the housing needs of those families at the time.

- **Disability<sup>16</sup>**

	NPE Tenants (%)	NPE leaseholders (%)
Yes	184 (19%)	3 (1%)
No	231 (24%)	22 (6%)
Unknown	562 (58%)	315 (93%)

<sup>15</sup> Tenant and Leaseholder data of Northumberland Park

<sup>16</sup> Tenant and Leaseholder data of Northumberland Park

While we have low disclosure rate in regards to the disabilities of tenants and leaseholders, it is likely they will be disproportionately impacted by any decision due to some disabled people requiring adapted properties. In addition to this, Northumberland Park ward has a disproportionately high level of people with long term physical impairments that impact a little or a lot on their ability to do day-to-day tasks as identified in the demographic section. This includes people with mental health conditions.

In addition to this, we are also aware that 213 tenants have identified themselves as having a vulnerability<sup>17</sup>. This includes physical impairments and mental health issues. The data does not distinguish between those who are vulnerable due to a particular disability and those because of other reasons, such as victims of domestic violence. However, it provides us with evidence that there is a significant proportion of disabled people on the Northumberland Park Estate, as well as other vulnerable groups such as vulnerable women, and are likely to include female headed lone parent families. Through the Housing Needs Assessment process, specific needs and reasonable adjustments will be identified and met when possible.

The new builds will be accessible for a number of disabled people and built to meet end user needs, through the ‘Design for Dignity’ standard – a recognised standard for accessible homes. This will allow us to meet the needs of the most vulnerable residents and those with adaption needs.

- **Sex**

	NPE Tenants (%)	NPE leaseholders (%)	Northumberland Park Ward
<b>Female</b>	566 (58%)	132 (39%)	50.2%
<b>Male</b>	409 (42%)	136 (40%)	49.8%
<b>Unknown</b>	2 (0.2%)	72 (21%)	

Women are disproportionately represented within the tenant population in the Northumberland Park Estate. It is likely that the women are disproportionately accessing community services and, for example, lead lone parent households. From the data above it is also likely women will be disproportionately represented in overcrowded households. From the data we have, there is approximately equal representation amongst leaseholders.

Any Estate Renewal will need to consider the impact on women, such as childcare provision, school places and those who have caring responsibilities, which, as has already be determined, are more likely to be the responsibility of women.

<sup>17</sup> This data comes from the Council’s arms length management organisation, Homes for Haringey. In terms of defining ‘vulnerable’, the starting point for this data is tenants self defining themselves this is then supplemented by specific checklist information regarding their: Medical Vulnerability; Mental Vulnerability; Physical Vulnerability; or whether they are a Vulnerable Woman. This data function now includes benefit data from iWorld – clients receiving Attendance Allowance or Disability Living Allowance are counted as vulnerable if not already flagged by the previous checks

- **Ethnicity**

	NPE Tenants (%)	NPE leaseholders (%)
Black African	202 (21%)	18 (5%)
White British	151 (15%)	5 (1.5%)
Black Caribbean	141 (14%)	8 (2.4%)
Unknown	92 (9%)	264 (78%)
Any Other Ethnic Group	64 (7%)	10 (3%)
White Turkish	55 (6%)	4 (1.2%)
White Kurdish	46 (5%)	8 (2.4%)
Black British	30 (3%)	3 (1%)
Other White European	30 (3%)	5 (1.5%)
White Irish	26 (3%)	1 (0.3%)
Other Asian	23 (2%)	
White Turkish Cypriot	22 (2%)	5 (1.5%)
Other White	18 (2%)	
Black Caribbean and White	16 (2%)	2 (0.6%)
White Greek Cypriot	14 (1%)	2 (0.6%)
Bangladeshi/UK Bangladeshi	9 (1%)	3 (1%)
East African Asian	7 (1%)	
Other Black	7 (1%)	
Mixed Black African/White	6 (1%)	1 (0.3%)
Mixed Other	4 (0.4%)	
Mixed Black	4 (0.4%)	
Indian or UK Indian	4 (0.4%)	
British Asian	2 (0.2%)	
Mixed Asian and White	2 (0.2%)	
Pakistani / UK Pakistani	1 (0.1%)	
Chinese	1 (0.1%)	1(0.3%)

The ethnic profile tenants roughly reflects the population of Northumberland Park. 21% of the tenant population identify as Black African, compared to 22% of the population of the ward. White British makes up 15% of tenants, compared to 16.59% of the ward population and 14% Black Caribbean compared to the ward's population of 13.54%. Other significant tenant groups include White Turkish (6%), White Kurdish (5%) and Other White European (3%) within the tenant population. Census data of the ward does not break down ethnicity in this manner, but 'Other White' is 20.73% in the ward. We expect that this trend would also apply to leaseholders, as 78% of leaseholders' have not disclosed their ethnicity so we are unable to determine this. It is likely that through this process, people from the BAME communities identified above will be rehoused away from their local community.



- Gender reassignment

We do not have data on the number of Trans\* tenant or leaseholders on the estate.

We do not envisage a disproportionate impact as a result of the Estate Renewal process for this protected group. However, we are aware that Trans\* people can experience discrimination and harassment and will therefore ensure equality policies are followed to minimise this occurring.

- Sexual Orientation

We do not have data on the sexual orientation of tenants and leaseholders on the estate.

We do not envisage a disproportionate impact as a result of the Estate Renewal process on this protected group. However, we are aware that LGB people can experience discrimination and harassment and will therefore ensure equality policies are followed to minimise this occurring, including treating a same sex couple, whether cohabitating, married or civil partnered, the same as a heterosexual couple.

- Religion and faith

We do not have data on the religion of tenants and leaseholders, but we understand that Northumberland Park ward has a range of communities with different religions and beliefs, in particular people from Christian and Islamic faiths, where there are larger religious communities in Northumberland Park. People of different faiths may be impacted from rehousing as it may cause them to be rehoused in an area of the borough away from their regular place of worship.

- Pregnancy and maternity

As identified in both sex and age, there are a number of overcrowded households on the estate with children under 5. The estate renewal process will need to consider the issues relating to pregnant women and women with young children in the rehousing process, including the impact of access on childcare and maternity and health services. This will be incorporated as part of the Housing Needs Assessment.

- Marriage and Civil Partnership Status

We do not have data on marriage and civil partnership status of tenants and leaseholders. During the Estate Renewal and rehousing process, a couple in a civil partnership will be treated the same as a couple in a marriage.

A full EqIA process will be undertaken before any estate regeneration and consultation processes, such as S105, will need to be undertaken. This will be done before any Cabinet decision has been taken. In this process considerations, such as translation and interpretation services and reasonable adjustments, will be incorporated in order to mitigate any negative actions or discrimination.

### **The overall offer to tenants and leaseholders**

The HDV offer to secure tenants and owners whose properties are demolished by the regeneration is based on statutory requirements and recent case law and set out below:

- Secure council tenants will be offered rehousing, and a statutory Home Loss and Disturbance payments;
- Resident Leaseholders and Freeholders will be offered a financial package that will comprise the market value for their homes, a Home Loss payment and a statutory

disturbance payment. Those wishing to return to the site will instead be offered the option of a fully owned new home as detailed below;

- Non-resident Leaseholders and Freeholders will be offered the market value for their homes, a Home Loss payment and a statutory Disturbance payment. They will also be offered a prioritised opportunity to buy in an early phase of the regeneration.

Furthermore, the HDV will act in accordance with all relevant council strategy and policy except where a departure from that policy is agreed in the business plan following consultation with residents.

A transparent allocation process for all rehousing will take account of needs and preferences. The HDV will issue a schedule of properties to be allocated to eligible households who will be given an opportunity to select their unit.

This Business Plan includes an offer to Resident Leaseholders and Freeholders that will provide them with an opportunity to own an equity share in an Intermediate Affordable home within a Category 1 property that forms part of the HDV's target 40% Affordable Housing provision.

The HDV will deliver in accordance with the Estate Renewal Rehousing and Payments policy to the extent that is defined in the Land Assembly Agreement.

The following assumptions are included in the financial model, and will be tested in more detail during the 100-day launch phase:

- In lieu of any financial package Residential Leaseholders will be offered an equity share in one of the new Intermediate homes in a Category 1 Property, that forms part of the overall Affordable Housing provision; and
- They will be given the option to downsize to release equity.

There are a significant number of additional options associated with Resident Leaseholders and Freeholders that will be assessed and considered by the HDV during the launch phases.

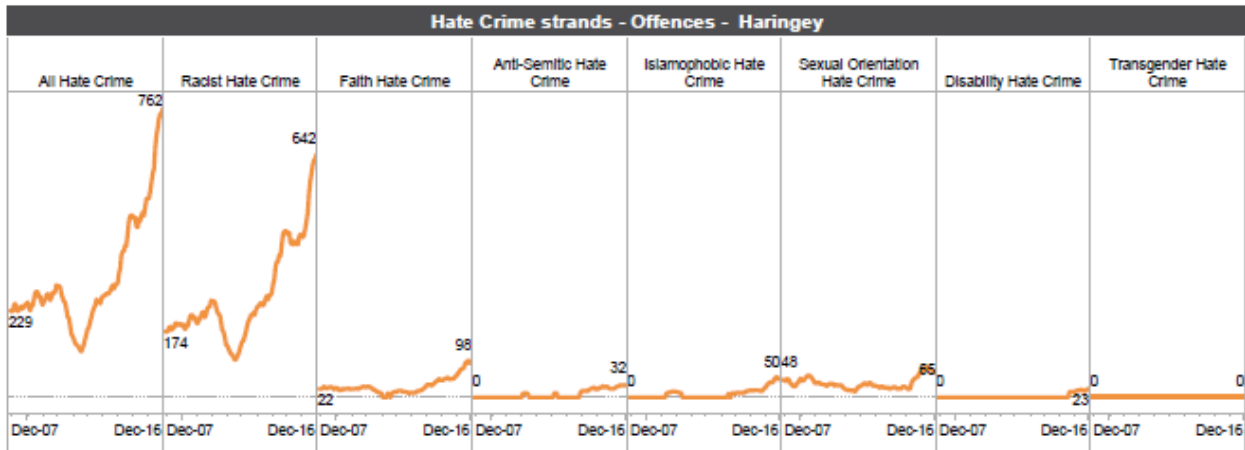
#### **d. Clean and Safe**

The NPBP will support the Community Safety Partnership's objectives<sup>18</sup> by helping to achieve the following objectives:

- Young People – Prevent and support
- Serious crime - violence, acquisitive crime and domestic violence
- Anti-social behaviour - A focus on children and families, housing and the public realm

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<sup>18</sup> <http://www.haringey.gov.uk/local-democracy/working-partnership/community-safety-partnership>



Source: Hate crime offences - MPS / Crime % change against the previous financial year - Home Office - Data for FY 2014/15 & 2015/16

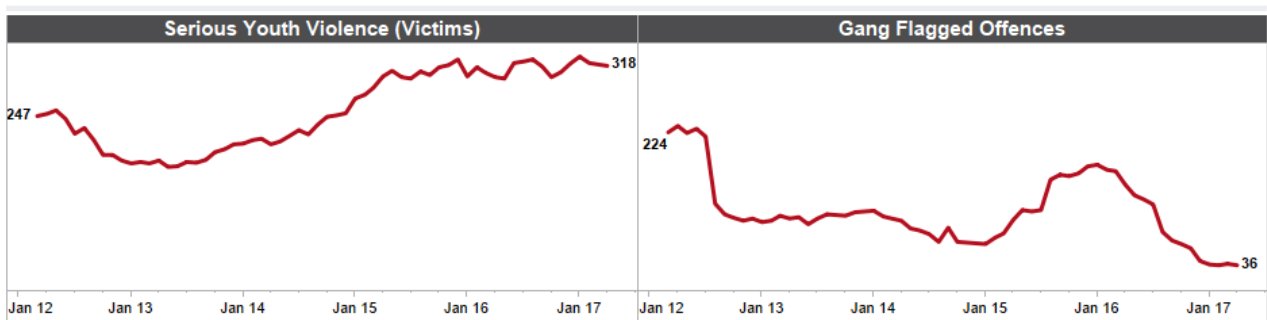
Please note that hate crimes are any offences which are flagged as having a hate element when recorded by police. To avoid unintentional disclosure any counts of less than 10 have been reduced to 0. A crime can have more than one hate flag attached to it. Adding up all the hate crime categories may result in multiple counting of a single offence and will not equal the All Hate Crime total.

There has been an increase of all recorded hate crime based upon race, faith (including Anti-Semitic and Islamophobic), sexual orientation and disability across Haringey. The data for transphobic hate crime is too small but we are aware that Trans\* people can be vulnerable to hate crime. By making streets safer and designing out crime, this will help reduce hate crime and the fear of hate crime. In addition, more space and areas to foster good relations between different communities will also help reduce hate crime. There is not Northumberland Park ward level data on hate crime.

### Gang and Serious Youth Crime

The Mayor of London’s Gang Crime and Serious Youth Crime Dashboard has found the following for LB Haringey<sup>19</sup>:

- There is an increasing trend in youth victims of knife crime resulting in injury with 2,054 recorded in the last twelve months (+26.5%)
- Victims of serious violence aged 19 and under has reached a high of almost 7,500 in the last twelve months.



Although we do not have up-to-date ward level data for Northumberland Park, it is likely that there will be serious youth violence and gang related crime in Northumberland Park. Vulnerable groups to being victims of crime include young people, older people, men, women and BAME groups. Through the measures contained in the NBP, such as designing out crime and estate renewal, these groups will experience safer and inclusive environments.

<sup>19</sup> <https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-research/crime%20gangs-dashboard>

This is confirmed by the 2014 'Key Principles for Change' consultation. This consultation, which was to inform the 'Northumberland Park Strategic Framework', asked residents for their views on Key Principles that could underpin regeneration plans for the area. In terms of open space and connectivity, the following feedback was provided:

- 83% of respondents agreed with the principle – 'In future, Northumberland Park should have better public open spaces with a range of facilities for everyone to use';
- 82% agreed with the principle – 'There should be new play areas for children and young people of all ages'
- 88% agreed with the principle – 'Northumberland Park should be made up of safe and pleasant streets with overlooked and well-lit footpaths'.

Future master planning, design and development processes will lay out the benefits of making streets, parks and open spaces feel safer and welcoming. The NPBP establishes a 'Power of 10' concept, which is creating 10 things to do in each park and open space. This will create uses and reasons for the public to use and dwell on the new open spaces created and encourage different groups to foster good relations by using public spaces to deliver this. Consideration will be needed for disability access to parks and open spaces and within the Power of 10 design.

By designing the public realm to be cycling and walking friendly, we can encourage people to cycle and walk. This will help tackle the inequalities in health and wellbeing, but also make the public realm feel safer and encourage different groups to participate in wider society.

The NPBP also includes schemes such as bike doctors and workshops to encourage people to cycle. Consideration will be needed to understand which groups are less likely to cycle and exploration of what the barriers are there to taking up cycling.

#### 4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

*Please outline which groups you may target and how you will have targeted them*

**Further information on consultation is contained within accompanying EqlA guidance**

The Northumberland Park business plan was influenced by the various consultations undertaken by the Council in recent years, starting with the Tottenham's Future consultation report, which can be accessed at:

[https://tottenham.london/sites/default/files/tottenhams\\_future\\_consultation\\_report\\_pdf\\_6.9mb.pdf](https://tottenham.london/sites/default/files/tottenhams_future_consultation_report_pdf_6.9mb.pdf)

**Tottenham's Future Consultation:** In October 2013, Haringey Council commissioned an independent organisation, Soundings, to conduct a thorough five-month consultation exercise called Tottenham's Future, to gather views from the community on their hopes and ambitions for the next 20 years. This included a dedicated focus on the Northumberland Park area. The responses fed into and shaped the council's 'Tottenham Strategic Regeneration Framework' which sets out how the local community's priorities can be achieved. More information on the Tottenham's Future consultation, and the Tottenham Strategic Regeneration Framework, is available to view at: <https://tottenham.london/about/tottenhams-future-consultation>.

**Northumberland Park Strategic Framework Consultation:** To inform the development of the Northumberland Park Strategic Framework, a two stage engagement process was held. The first stage helped to inform the development of a set of 'Key Principles for Change' whilst the second stage asked for the community's views on these Key Principles. The following views were recorded from residents at the consultation in response to the Key Principles for Change:

**THE PLACE**

- There is too much wasted space – regeneration plans should make better use of open space;
- The area should be more attractive, clean and feel safe to walk around;
- Buildings should be more environmentally friendly and sustainable;
- Tottenham Hotspur FC’s new stadium development is widely supported; and
- There is a lack of shops, community space and other facilities in the area.

**HOMES**

- Improving existing housing should be a priority;
- There should be more variety in the types of buildings – from family homes with gardens to modern apartments;
- The quality of the housing should be improved;
- There should be more housing choices, including affordable homes; and
- The space standards of the existing homes should be retained.

**OPEN SPACE**

- The area suffers from a poor environment and open space doesn’t feel safe and clean;
- There is a lack of usable open space and this should be improved;
- There should be more parks and green open space for all to enjoy;
- There should be more places for children to play safely and a greater range of facilities and activities in the public open space; and
- There should be more public spaces where people can meet and come together.

**COMMUNITY**

- There is a strong community spirit and this should be preserved;
- There should be more, and better, schools and educational opportunities;
- There should be more community, leisure and cultural facilities for all, in particular children and young people;
- There should be improved health facilities;
- There is a lack of high street shops in Northumberland Park; and
- Northumberland Park is not one place but several distinct neighbourhoods.

**CONNECTIVITY**

- The overall environment, including the roads and streets, should be improved;
- The area should be safer and more attractive for walking and cycling;
- Road safety and parking should be improved;
- The level crossing at Northumberland Park is dangerous and should be closed;
- Public transport should be improved; and
- Local shops are struggling and would benefit from more people passing by.

Further information about this consultation is available to view here:

<https://tottenham.london/explore/northumberland-park/explore-northumberland-park-key-principles-change>

**Tottenham Area Action Plan Consultations:** The Authority has prepared the Tottenham Area Action Plan Development Plan Document that puts clear planning guidelines and policies in place to support local people’s ambitions for long-term regeneration in Tottenham, bringing thousands of new homes, better access to jobs and employment and improved transport links. The Area Action Plan includes clear policy guidance about how change and development should come forward in the Northumberland Park area. Since 2015, public consultations on the Regulation 18 and Regulation 19 versions of the Area Action Plan have taken place with an

Examination in Public happening between August – September 2016. Subject to the Plan being found ‘sound’ by the Planning Inspector, the Area Action Plan will be reported to Regulatory Committee, Cabinet and Full Council for formal adoption in Summer 2017.

The results of the various consultation exercises set out above have fed into the NPBP.

**4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics**

*Explain how will the consultation’s findings will shape and inform your proposal and the decision making process, and any modifications made?*

HDV will build on the consultation activities undertaken by the Council to date, and fully engage with local stakeholders to explore their views, wants, and needs. With input from the community and in conjunction with the Council, HDV will develop a shared vision, and test and develop the design framework and the other strategies and plans captured in the NPBP to create a shared direction for the transformation. Please see appendix 8 of the NPBP (Community and Stakeholder Engagement Plan) for further information regarding HDV’s proposed consultation and engagement activities.

This is in addition to the Council’s own engagement and consultation plans for Northumberland Park. In particular, section 105(1) of the Housing Act 1985 requires the Council to make and maintain such arrangements as it considers appropriate to consult with its secure (and demoted) tenants who are “likely to be substantially affected by a matter of housing management”. A full S105 consultation will be carried out in Northumberland Park to ensure all statutory requirements are met.

Full consideration will be needed to ensure that all persons with protected characteristics take part in the various consultations that will take place to inform the substance of the NPBP and the regeneration proposals that come forward.

**5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?**

*Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.*

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

**1. Sex**

As identified on pages 4,9, 11, 18, 20, 22, the NPBP has many positive and negative impacts for both male and females which are summarised below:

Women and girls:

- Women are more likely to head up lone parent families, which can act as a barrier to unemployment, and there is a high level of unemployed lone parent households, which are more likely to be headed by women. Therefore the business plan will provide opportunities to develop pathways into employment and education that would not otherwise exist, such as through the Skills and Employment Hub
- Women are over represented on the Northumberland Estate and they are more likely to be heading lone parent families. This will need to be considered through the Housing Assessment Process in regards to appropriate housing size and consideration is made if a woman is pregnant. There may be some disruption in the rehousing process but a full EqIA will be undertaken for the Northumberland Park Estate Renewal

#### Men and boys

- Due to the social deprivation of the surrounding area of Northumberland Park Community School, there is a particularly high rate of school leavers who are leaving without qualifications and are more likely to be NEETs. Boys make up a slightly disproportionate level of the schools population. The proposed education facility will provide opportunities to tackle these inequalities, as well as the Skills and Employment Hub
- Men and boys are more likely to have a mental health issue or condition and therefore will benefit in the longer term from the health offer, in particular, single men from BAME communities are particularly vulnerable
- Young men and boys are more likely to be gang members and victim of gang crime and therefore will benefit from the measures proposed to reduce such crime.

The NPBP is high level and further work will be needed to understand the operational impact of parts of the business case, such as the new school facility, and full EqIAs will be developed as particular aspects of the NPBP reach decision making points. These include:

- The school
- Health and Wellbeing Centre
- Estate renewal

Consideration for inequalities for both males and females will need to be reviewed appropriately.

In designing aspects of the NPBP, consideration will be needed to engage with both male and females, especially in regards to the issues identified above, to ensure that they meet the needs, and tackle the inequalities, of the male and female residents of Northumberland Park. Issues, such as childcare for lone parents and stigma attached to males with mental health issues, should be considered to ensure both sexes are engaged in consultation processes.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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## 2. Gender reassignment

We do not have local data regarding this protected characteristic, but there is consideration for this protected group on pages 4, 23 and 25.

People who are Trans\* will benefit from increase community safety which may reduce transphobic hate crime or fear of such crime.

We do not envisage any other inequalities based upon this protected characteristic as a result of the NPBP. Full EqlAs will be undertaken for aspects of the NPBP which should address any emerging inequalities for this protected characteristic.

Positive	X	Negative		Neutral impact		Unknown Impact	
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### 3. Age

Northumberland Park has a comparatively young population. However, there will be positive and negative impacts for people of different ages and age groups. See pages 5, 6, 10, 15, 20, 25 for more details. This includes:

Children and young people:

- 16-17 year old NEETs are disproportionately large in Northumberland Park. The NPBP will create new jobs through the development. There will be significant opportunities in educational and vocational pathways to reduce the number of NEETs in the ward, in particular through the Skills and Employment Hub
- The development of a new school facility will provide opportunities for children and young people, as a disproportionately high level of school leavers leave the school without qualifications. It will also cause some disruption as it will directly impact on two schools. However, the details of this are to be developed and a full equality impact assessment will be undertaken to ensure compliance with the Public Sector Equality Duty.
- The NPBP currently identifies a potential first phase of change (subject to full stakeholder and community engagement) as the building of new homes on the existing NPCPS playing fields. If this proposal were to go ahead it would likely impact on the ability to undertake sports activities on the playing fields (if alternative facilities were not provided) and this would impact particularly on children and young people. If this proposal were to be identified as a first phase it would require a full EqlA before any final decision was made.
- Northumberland Park has one of the highest rates of childhood obesity in the borough. The NPBP will provide opportunities to increase physical activity (through the design of the scheme and the provision of open spaces and facilities) and healthy eating (through a targeted retail strategy) to tackle this inequality. As proposals for a new Health and Wellbeing Centre are developed, a full EqlA will be undertaken to influence the operating model of the centre.
- There is a lack of suitable housing for children and young people on Northumberland Park Estate, where there is significant overcrowding in households with children under 18. Housing Needs Assessments will be undertaken to ensure these families have the most appropriate accommodation
- Children and young people can be vulnerable to gang crime, including victims of gang crime. Creating a safer public realm and housing will help reduce this.
- The HDV will need to be mindful of the impact of any proposals in the NPBP or in future regeneration proposals on existing childcare facilities.

Older people



- Northumberland Park has one of the lowest life expectancies in the borough at 76 years old. In comparison, Crouch End is at 82.4 years old. The NPBP recognises this and has set healthy eating, physical activity and independent living as outcomes for the health offer
- Potential for sheltered housing with direct access to, and support from, the health centre
- Older people are over represented as tenants of Northumberland Park and are likely to be over represented amongst leaseholders on the estate due to access to financial services. Consideration is needed to ensure that older people are not put at a disadvantage as a result of any estate renewal programmes. For example, leaseholders will be offered the right to return under a similar arrangement as tenants, which will be beneficial for older people who are retired or close to retirement and cannot obtain a mortgage to buy a new property. Mitigating actions will be undertaken as part of the Estate Renewal and Repayments Policy.

The NPBP is high level and further work will be needed to understand the operational impact of parts of the business case, such as the new school facility, and full EqIAs will be developed as particular aspects of the NPBP reach decision making points. These include:

- The school
- Health and Wellbeing Centre
- Estate renewal

Engagement processes need to consider the needs of both children and young people, as well as older people, to ensure that these groups are provided every opportunity to engage in the regeneration processes.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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#### 4. Disability

Residents of Northumberland Park are more likely to have a physical impairment or mental health issue than the rest of Haringey or London. Reasonable adjustments may need to be made to ensure there are no unintentional barriers created through the implementation of the NPBP.

Key impacts on the disability protected group can be found on pages 6, 9, 10, 11, 18, 21-22 and 25, which are summarised below:

- Greater employment opportunities through extending the vocational offer. Consideration will be needed on how to include disabled people to help them into employment as disability has been identified as a barrier for employment
- Development of the new school facility which will provide SEN educational opportunities. Issues such as parking spaces for SEN parents and carers and accessibility issues to the building will be determined later and a full equality impact assessment undertaken
- The healthy living offer, including the new Health and Wellbeing Centres, will help improve health outcomes and increased life expectancy. This will help prevent conditions, such as strokes and worsening mental health issues, and therefore improve independent living

- There is a high level of people who have said they have a disability (19%) and 213 tenants are identified as vulnerable. The new builds will be accessible and built to meet end user needs, which will be designed by Design for Dignity standards.
- There will be short term negative impacts in any rehousing. Any tenant that requires an adaptive home will be rehoused accordingly through the Housing Needs Assessment process. Consideration will be needed to support people with Learning Disabilities or mental health issues
- Disabled people will also benefit from the changes in public realm and street design as the benefits will include reduction in the extent of disability related hate crime. Consultation processes should actively engage with disabled people to ensure that the design of the public realm does not create additional barriers.

The NPBP is high level and further work will be needed to understand the operational impact of parts of the business case, such as the new school facility, and full EqIAs will be developed as particular aspects of the NPBP reach decision making points. These include:

- The school
- Health and Wellbeing Centre
- Estate renewal

In the development of engagement processes, disabled people should be actively encouraged to take part, representing a range of different disabilities, such as physical impairments, mental health conditions, sensory impairments and Learning Disabilities. In running engagement processes, reasonable adjustments should be offered.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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## 5. Race and ethnicity

Northumberland Park is one of the most diverse wards in the borough and has large Black African, Black Caribbean, Turkish, Kurdish and East European communities. In addition to this, there are a range of inequalities, for these communities, often as a result of poverty. Full details can be identified on pages 7, 10, 11, 15, 18 and 25 The NPBP will attempt to reduce inequalities for these groups by achieving the following:

- Increase educational and vocational pathways to reduce the number of NEETs in the ward through the Skills and Employment hub
- Improve the school facility to help reduce inequalities experienced in educational outcomes in Northumberland Park Community School
- Reduce health inequalities, such as reduce the gap in life expectancy and reduce childhood obesity by making Northumberland Park a place where the healthy choice is the easiest choice, which BAME communities are more likely to experience
- Provide more housing for communities who are vulnerable to homelessness, as well as better quality housing in mixed communities in order to foster good relations between different communities. This will cause some short term disruption, which will particularly impact on BAME groups who live on the estate. The provision of mixed community and mixed tenure housing may also result in the break-up of established communities. However, the Council will adopt the right to return policy to minimise the disruption and any negative impacts caused by rehousing

- The NPBP will provide opportunities to improve the safety of the public realm and reduce gang and youth violence. People from particular BAME communities are more likely to experience hate crime and be victims of crime in general. The NPBP will provide opportunities to tackle this.

The NPBP is high level and further work will be needed to understand the operational impact of parts of the business case, such as the new school facility, and full EqIAs will be developed as particular aspects of the NPBP reach decision making points. These include:

- The school
- Health and Wellbeing Centre
- Estate renewal

As the NPBP is developed, engagement exercises will be undertaken. Consideration will be needed to ensure that different communities are fully engaged. Measures, such as translation and interpretation should be considered for people who do not have English as a First Language.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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## 6. Sexual orientation

We do not hold data at the national, borough or ward levels. However, we are aware there is a significant LGB population in Haringey compared to other places in England (see pages 7-8, 23 and 25).

There may be some benefits for lesbian, gay and bisexual people in Northumberland Park, such as increase community safety which may reduce homophobic and biphobic hate crime and access to mental health provision, as there may be health inequalities based upon sexual orientation.

Any same sex couple who are cohabitating, married or in a civil partnership living in the Northumberland Park Estate will be treated the same as a heterosexual couple in any future rehousing.

We do not envisage any direct inequalities based upon this protected characteristic. Engagement processes should encourage the participation of LGB people and ensure there are no barriers to them taking part.

Positive	X	Negative		Neutral impact		Unknown Impact	
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## 7. Religion or belief (or no belief)

Northumberland Park has large Christian and Muslim communities, especially compared to the rest of Haringey. Consideration for different religious groups can be found on pages 8, 23 and 25. Any benefits experienced in Northumberland Park will particularly benefit this community.

The development of the public realm to increase community safety will have a positive impact in regards to tackling Islamophobic, Anti-Semitic and other religious hate crime.

However, there may be negative impacts through the Estate renewal and rehousing process as individuals and families could be rehoused away from their regular places of religious worship.

The NPBP is high level and further work will be needed to understand the operational impact of parts of the business case, and full EqlAs will be developed as particular aspects of the NPBP reach decision making points. These include:

- The school
- Health and Wellbeing Centre
- Estate renewal

To ensure that people of different faiths are involved in the engagement process and development of the business case, consideration will be needed to ensure that there are no barriers, including how to engage with women. Proactive measures, such as engaging with local religious institutions and organisations will be required.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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**8. Pregnancy and maternity**

Northumberland Park has a disproportionate number of younger people as well as lone parent households which are headed by women. Details can be found on pages 8, 9, 20 and 23 and are summarised below

- Female headed lone parent households are more likely to be unemployed or economically inactive. The Skills and Employment Hub will help tackle this inequality
- Additional health and wellbeing services for pregnant women, as well as affordable 0-5 childcare services could be developed
- Consideration will be needed to ensure that pregnant women and mothers with young children are not disadvantaged through the Estate Renewal and rehousing process. This will be developed through the Housing Needs Assessment process to ensure there is still access to childcare, maternity health services and other support services.

The NPBP is high level and further work will be needed to understand the operational impact of parts of the business case, and full EqlAs will be developed as particular aspects of the NPBP reach decision making points. These include:

- The school
- Health and Wellbeing Centre
- Estate renewal

Engagement processes should attempt to ensure that women who are part of this protected group take part in consultation and codesign processes with an understanding of childcare needs.

Positive	X	Negative		Neutral impact		Unknown Impact	
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**9. Marriage and Civil Partnership**

Couples who are being rehoused and are in a civil partnership will be treated the same as if they were in a marriage. Consideration for where there could be areas of discrimination can be found on pages 9 and 23.

Positive		Negative		Neutral impact	X	Unknown Impact	
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**10. Groups that cross two or more equality strands e.g. young black women**

The NPBP is a high level document aiming to tackle multiple issues, as well as projects and activities to deliver over a long period of time. As a result, there will be significant intersectionary inequalities and impacts which will cross different protected characteristics. In particular, the protected groups of sex, disability, ethnicity, religion and age are particularly significant. However, the uniting factor is that residents in Northumberland Park have a mainly low socio-economic status and the NPBP will attempt to reduce this inequality so residents in Tottenham have the same opportunities as the rest of the borough.

**Outline the overall impact of the policy for the Public Sector Equality Duty:**

- Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

Procurement processes will have ensured that items in the NPBP will not lead to discrimination, harassment or victimisation to residents and staff when delivering services. Measures, such as potential rehousing will not discriminate.

There are many inequalities in Northumberland Park ranging from economic, educational, health and community safety. The NPBP will attempt to tackle these inequalities as outlined extensively in the business case. There will be some short term disruption caused by rehousing in order for estate renewal to commence. However, the HDV will adopt measures to minimise the impact and allow households the right to return. Measures will also be introduced for leaseholders to allow them to return on similar terms as tenants. There are other areas of the NPBP for which the implications are not fully known and therefore further equality impact assessments will be undertaken to pay due regard in compliance with the Public Sector Equality Duty.

The NPBP will provide opportunities to foster good relations between different groups by providing a safer and more welcoming public realm and allowing mixed tenure communities.

**6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?**

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that	Y

<u>you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	
<b>Adjust the proposal:</b> the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	
<b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	

**6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty**

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale
Businesses (sex, disability, race, religion)	To develop a Business Charter, to be agreed by the HDV Board via the annual Business Plan review process, that commits to no negative impacts on businesses affected by the NPBP where a key public function or specific cultural offer is delivered from	Director of Regeneration	By April 2020
School (sex, age, disability)	A full EqIA will be undertaken in partnership with the schools and relevant stakeholders in order to ensure due regard is paid to the Public Sector Equality Duty.	Director of Regeneration; Director of CYPS	Dependant upon master planning and stakeholder decisions regarding schools' relocation
Health and Wellbeing Centre (sex, age, disability, race, religion, pregnancy and maternity)	A full EqIA will be undertaken to ensure that the centre will tackle local inequalities.	Director of Regeneration	Dependant upon master planning and stakeholder decisions
Northumberland Park Estate – Tenants (sex, age, disability, race, religion, pregnancy and maternity)	The Council has adopted a policy to ensure that negative impacts from any rehousing will be mitigated for protected groups who are disproportionately impacted by the decision.	Director of Regeneration	July 2017
Northumberland Park Estate – Leaseholders (sex, age, disability, race, religion, pregnancy and maternity)	The Council has adopted a policy to ensure that negative impacts from any rehousing will be mitigated for protected groups who are disproportionately impacted by the decision.	Director of Regeneration	July 2017

Estate Renewal Housing Needs Assessment (sex, age, disability, race, religion, pregnancy and maternity)	All individuals and families affected by the Northumberland Park Estate Renewal process will receive a Housing Needs Assessment.	Director of Regeneration	From Autumn 2017
Engagement and co-production (all)	Develop engagement methods to include excluded and vulnerable groups including children and young people, older people, women and girls, disabled people including physical impairments, sensory impairments, Learning Disabilities, people with mental health issues, BAME communities, different religious communities and LGBT communities.	Director of Regeneration	From Autumn 2017

**Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.**

The NPBP is high level and further EqlAs will be undertaken for individual projects as they are designed. Any negative impacts or inequalities identified through these will be mitigated and monitored.

**6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:**

Any mitigating actions will be monitored during the implementation of the business plan through the governance structure of the HDV. This should also be incorporated in reporting to Cabinet and planning processes.

## 7. Authorisation

EqlA approved by Helen Fisher, Director of Regeneration	Date 23/06/2017
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## 8. Publication

*Please ensure the completed EqlA is published in accordance with the Council's policy.*

Please contact the Policy & Strategy Team for any feedback on the EqlA process.