

EQUALITY IMPACT ASSESSMENT

Name of Policy/Service/Function	Blackhorse Lane Interim Planning Policy Framework (IPPF)
Date of Assessment	July 2007
Directorate	Sustainable Communities
Head of Service	Rob Pearce
Names and Roles of the people carrying out the EIA	Judith Carlson, Regeneration, LB Waltham Forest Susan Clarkson, Regenfirst Ltd
Why is the Equality Impact Assessment being done?	New Policy and on current EIA Schedule

1. Introduction and Background

1.1 Summary of proposal and link to six equality groups

The Blackhorse Lane area incorporates the whole of Higham Hill and extends across William Morris and into High Street wards. It has a relatively young and diverse population of approximately 16,000 people.

The Blackhorse Lane Interim Planning Policy Framework (IPPF) is intended to support and encourage the transformation of the Blackhorse Lane area over the next 10 years. It outlines a clear vision for the future of the area that is supported by the Council and other stakeholders (statutory agencies, landowners and the local community). It is a universal policy but the main beneficiaries are existing and new residents, local businesses and visitors to the area.

A consultation strategy has been implemented to encourage all sections of the community to voice their opinions. The 3 major consultation exercises were:

- **Visioning:** November/December 2004 public and stakeholder consultation on the vision for Blackhorse Lane.
- **Options:** November/December 2005 public and stakeholder consultation on three options for the broad scope of the proposed new planning framework for the area.
- **Final:** June/July 2006 formal public and stakeholder consultation on the draft Interim Planning Policy Framework and two draft Planning and Design Briefs for key sites.

As part of the consultation strategy a wide range of community engagement methods have been employed:

- **Brochures:** A brochure was published for each phase of the engagement process and delivered to all 10,000 homes and businesses in the area as well as being sent to the ever growing project mailing list. Reply paid postcards and a prize draw encouraged a high response rate.
- **Events:** Exciting events to engage different sections of the community including business breakfasts and a major community planning day attended by around 100 local residents with guided walks to audit issues and brainstorming solutions.
- **Local Governance:** Used existing structures of local governance including Walthamstow West Community Council and Higham Hill Community Forum.
- **Outreach:** Outreach activities were used to involve people who would not normally contribute to consultation – these activities involved engaging with

people going about their daily business, for example at the tube station and in local shops. Some outreach events targeted specific groups traditionally under-represented, for example presenting the plans at a meeting of local group of elderly and disabled people, focus groups with young people and one to one discussions with parents and carers at parent and toddler drop in sessions.

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Consultation methods and numbers reached

Launch event 70
Stakeholder group meeting 10
LSP meeting 8
Walthamstow West Community Council (January 2005) 100
Community workshop 103
Touring information stand 130
Church congregation meetings 270
Parent and toddler groups 55
Waltham Forest Community Empowerment Network 20
CREST meeting 20
Stakeholder workshop 40
Services and facilities workshop 34
Members Forum (July 2005) 7
Members Forum (December 2005) 6
Phase 2 exhibition 130
Waltham Forest Cycling Campaign Meeting 10
Business Breakfast 53
Higham Hill Community Association public meeting 40
Community Facilities Audit (including Young People Focus Groups) 85
Walthamstow West Community Council (July 2005) 70
Open Spaces and Nature Conservation Group Meeting 6
IPPF exhibition 30
Walthamstow West Community Council (June 2006) 100
Members Forum (July 2006) 17
Consultation event on plans for Chalk Bridge and paths to Tottenham Marshes (June 2007) 26

- **Interpreting and translation:** all consultation materials could be made available in community languages, audio tape, large print and braille on request. Each incorporated a translation panels with the top 10 community languages.
- **Website:** The latest news regarding the project is available on the Blackhorse Lane pages of the Council's website (www.walthamforest.gov.uk/blackhorselane).
- **Newsletters:** are published quarterly in wfm.
- **Press releases:** periodically as required.

Responding to the consultation: After each phase of consultation detailed and robust analysis of feedback was undertaken, published on the Council website and used to inform the next stage in the development of the plans. The project has also employed a customised issue-tracking database to ensure that every issue made by members of the local community was properly considered. Customised letters have also been sent to each respondent providing feedback on their response and how any issues raised by them have been addressed. This ensures that the process is accountable and respondents feel empowered.

2. Profile and needs of groups affected

2.1.1 Age Equality

Consultation:

- Three youth focus groups were convened to elicit views on the best and worst features of the Blackhorse Lane area and things that would make the area better.
- Parent and toddler groups engaged during consultation – 55 persons consulted.
- Outreach events targeted specific groups and included presentation of the plans at a meeting of local elderly and disabled people
- Age Concern Waltham Forest has been consulted.

Area Profile: Over 42% (14,104 people) of the population of all three wards in the study area are under 30 years old.

	High Street	William Morris	Higham Hill	Waltham Forest
60+	14	13	14	16
29-59	42	42	41	41
16-29	25	24	20	22
U16	19	21	25	21

Identified needs and issues:

The following needs and issues were identified by residents during the consultation process.

- A shortage of facilities/activities for young people
- A lack of services/facilities for elderly residents
- Vandalism, poor maintenance, dog fouling and lack of supervision makes parks and other play areas intimidating

The Community Facilities Audit found that there are no significant deficits in the quantum and range of existing facilities but that access could be improved.

2.1.2 Disability equality

Consultation

- Outreach events targeted specific groups and included presentation of the plans at a meeting of local elderly and disabled people – 20 people consulted.

Area Profile: The proportion of the population with limiting long term illness is above 15% in all three wards and in Higham Hill it is above the Borough average. This pattern is also reflected in people reporting that they do not have good health and in the percentage of persons providing unpaid care.

The Blackhorse Lane Area Employment Growth Study, 2005 indicates that 1.5% of the workforce in the area are disabled.

	High Street	William Morris	Higham Hill	Waltham Forest
Poor Health	8.6	8	9.3	9
Limiting Long Term Illness	15	15	17.2	16.5
Unpaid Caring	8	8	11	

Identified needs and issues:

- Access to public transport
- Access to the Lee Valley Regional Park.

- Inclusive design
- Development of affordable lifetime homes
- Selection of RSL Partners including supported housing organisations to deliver affordable homes

2.1.3 Gender equality

Consultation:

- Parent and toddler groups – 55 people consulted
- Other outreach activities targeting places where people who would not usually contribute could get involved. For example, in local shops and tube station – 130 people consulted

Area profile: In all three wards a higher proportion of the population is female as compared to male. This reflects the gender profile of the population as a whole.

Identified Needs and Issues

Few specific needs were identified during consultation but a wide range of issues may be identified from the established research base on gender and social policy.

- Women are the greatest users of public services.
- The Youth Focus Groups suggested that access to sports facilities, particularly at Higham Hill Recreation Ground, is male dominated. There is a shortage of girl only sports activities and classes that would give girls access to boy dominated activities and their own meeting/social space.
- Affordable homes – the London Plan reports that women on average earn 77 per cent of men’s earnings per hour and as a result they are less able to buy a home.
- Public transport – women need convenient, affordable and safe public transport.
- Crime/fear of crime – women’s experiences of London are affected by personal safety in both the public realm and on public transport.
- Child/elder care – women still have the main responsibility for supporting children, elderly people and those with limiting illness. The Government wants to ensure that every neighbourhood can provide good quality, accessible, affordable and culturally and religiously sensitive childcare to allow fathers and mothers a choice in how they balance earning and caring.

2.1.4 Race equality

Context: CRE has recently commissioned a formal investigation into physical regeneration to determine whether the effects of regeneration schemes on different racial groups have been fully considered. Community participation and private sector involvement are key areas for consideration alongside measuring success in meeting the needs of BME communities

Area Profile:

	High Street	William Morris	Higham Hill	Waltham Forest
White	59	58	62	64
Asian	22	20	12	15
Black	13	15	19	15
Mixed	4	4	5	4
Other	2	3	2	2

Around 40% (13,342) of residents are from Black and Minority Ethnic communities which is slightly higher than the Borough average. There is a significant Asian population within High Street 21.7% (2,418 residents) and William Morris 18.8%

(2,175 residents). In Higham Hill a high proportion of the population are from Black communities 18.6% (2,079 residents).

Recent data from the 2006 Pupil Level Annual School Census (PLASC) indicates that these groups, along with White British are still the largest groups amongst school pupils in the area but that the accession of 8 new member states to the European Union is driving rapid change in the population profile. A comparison of the 2004 and 2006 PLASC groups highlights that the White Eastern European group has grown significantly since 2004 by 82.9%, a rate above the Waltham Forest average (67.7%).

There is also a sizeable traveller's community in the Blackhorse Lane area and a travellers site is located in Folly Lane. The 2006 PLASC results indicate that the traveller of Irish Heritage and White Gypsy Roma populations have grown since 2004. Many travellers have settled across the wider Blackhorse lane area.

The Blackhorse Lane Area Employment Growth Study, 2005 indicates that a large proportion of the workforce in the area is from BME groups. Half of employers in the Blackhorse Lane area stated that more than half of their staff are from BME groups, a further quarter of employers stated that up to half of their staff are from BME groups.

Identified needs and issues:

- Selection of RSL partners including BME organisations to deliver affordable homes
- A need for larger affordable homes
- Some places of worship are currently located in the strategic employment area and on key development sites
- The travellers site in Folly Lane is located within a flood zone

2.1.5 Religion/Beliefs

Consultation:

- Church congregations were engaged in the consultation process and 270 individuals were consulted
- Temple of Truth Bible Study Group provided one of the youth focus groups

Area Profile:

	High Street	William Morris	Higham Hill	Waltham Forest
Christian	48	49	58	56.8
Muslim	21	17	13	15
Hindu	2	(451) largest in WF		1.83
None	17	18	15	15

The 2001 Census indicates that the predominant religious group in the Blackhorse Lane area is Christian. There is also a relatively high proportion of Muslims in High Street and William Morris. Although Hindus are a much smaller religious group in Waltham Forest, William Morris and High Street wards are home to the most significant Hindu communities in the Borough.

There are a number of churches in the immediate area and the Community Facilities Audit highlighted that some of the churches in the area are meeting needs for particular sections of the community e.g. Black churches. Congregations are often drawn from a wide catchment area which has led to conflicts over traffic congestion and parking. A number of these churches have located in industrial premises. A

planning permission for change of use is required in these circumstances. The LPA has successfully taken enforcement action against one such church which located in the Strategic Employment Area around Lea Bridge to the South of the Blackhorse Lane area. In determining such cases the protection of prime employment land (INB1) must be weighed against the need for community facilities (GCS1) and any amenity issues giving rise to complaints by local residents and businesses located in neighbouring properties.

Although there is a significant Muslim population in the area there are few community facilities in the immediate area. There are a number of mosques in Waltham Forest but these are concentrated around Queens Road, Lea Bridge Road and Leyton High Road areas where the established Pakistani and Muslim communities are concentrated. However, a Muslim burial ground is located in Higham Hill. The need for additional burial space is a key requirement for the significant Muslim community in the borough and in December 2006 Cabinet agreed to dispose of adjacent land to extend this facility.

There is a Hindu temple adjacent to Lloyd Park in William Morris Ward.

Identified needs and issues:

- Consider inclusion of places of worship in mixed use schemes subject to sustainable transport plan
- Consider out of hours use of schools for worship
- Relocation of places of worship currently located in the strategic employment area or on key development sites

2.1.6 Sexual Orientation

There is currently no data available and no specific needs arose as part of the consultation.

3. Questions this assessment addresses

3.1 What kind of equality impact may there be?

The policies articulated within the IPPF aim to build sustainable and inclusive communities. Future implementation of the policy framework will help promote equality of opportunity and enhance community understanding and participation through the construction of 2000 new homes in mixed tenure developments (50% affordable) and by leveraging significant public and private sector investment into green infrastructure, new public open spaces and community facilities.

The IPPF aims to address the needs of the local community that have been identified through research and consultation. Some of the policies are directly relevant to the council's equalities duties for example:

- **Disability access:** the proposals will significantly improve access for disabled people (as well as families with push chairs) in the area. In particular, all new developments (including shops, restaurants and services) will be required to be accessible (as required by the Disability Discrimination Act and the Waltham Forest Unitary Development Plan). The Planning Framework states that 'in line with UDP Policy SG10 the Council will seek to ensure that all new housing in the Blackhorse Lane area is built to 'lifetime homes' standards, and that 10% of new housing is designed to be wheelchair accessible, or easily adapted for residents who are wheelchair users'. The planning framework also proposes new and

improved paths to Tottenham Marshes and the Lee Valley Regional Park and specifies that access for disabled people is a 'key design consideration' for these paths.

Transport for London has an ongoing programme of work to improve accessibility on buses, tubes and trains and the situation should continue to improve over the coming months and years. IPPF Section 11.3.4 states that "the Council will also work with Transport for London and relevant rail companies to seek improvements to the mainline station such as new passenger waiting shelters, additional CCTV cameras, new lighting and step-free access to the platforms." However, Blackhorse Road Station is not currently included in LUL's Access for All Programme and is considered to be a low priority for step free access to platform level (TAIS 6.23). Step free access is available at Tottenham Hale on the Victoria Line and Queen's Road on the Barking to Gospel Oak line.

- **Young People:** The IPPF states that the Council will "prioritise meeting the needs of young people through developments within local schools and by supporting the refocusing or expansion of existing provision." The proposals for two new secondary schools in the area will make significant improvements to provision for young people, both within school time and after school. Both new schools will also offer the wider community access to much-enhanced sports, leisure, learning and other community facilities. There is also potential (identified in IPPF Section 10.1) to develop after school provision at William Morris school and to provide outreach youth work from the proposed new Joint Service Centre on the corner of Blackhorse Lane and Billet Road. The academy is now under construction but the future of Willowfield School is still not decided.

IPPF Section 7.4 also identifies the potential to include informal recreation facilities for young people on Cheney Row Open Space to the north of Billet Road and to improve access to existing and improving facilities such as the canoeing club at Stonebridge Lock in Tottenham Marshes.

- **Older people:** The IPPF supports a range of improvements to the area's environment and facilities that will be of particular benefit to older people. These include improvements to pedestrian crossings, lighting and streetscape along Blackhorse Lane/Billet Road and at the Royal Standard junction; the creation of a new neighbourhood centre providing shops and local services around a public square with public seating that is fully accessible to disabled people; new and fully accessible paths through to Tottenham Marshes; a new waterfront park with walks, public seating and views. In addition, the new joint service centre at Essex Hall will provide more convenient access to some Council services together with community facilities and the proposed new health centre would make health services more accessible.
- **BME:** the IPPF seeks to deliver a high proportion of 3 and 4+ bedroom affordable homes (55% of new social rented and 35% of new homes in the intermediate sector). This will help to meet the identified needs of BME households in the Borough. Affordable housing developments will use pepper potting techniques to diversify tenure.
- **Gender:** women generally have lower incomes and are more likely to be carers so are positively impacted by the increase in supply of affordable homes. Women are also more likely to use public transport and so promoting safe, sustainable transport and improving the pedestrian environment should also have a positive impact.

The policy aims to ensure that the new developments in the area meet the diverse needs of the local community. However the types of services and shops that are provided as part of the new developments is largely dependent on market forces and may be of limited benefit to low income groups

3.2 How significant is it in terms of its nature and the number of people likely to be affected?

The population of the area is around 16,000 people. All people living and working in the area are likely to be affected along with those using the Station and visiting the Lea Valley Regional Park.

3.3 Is the impact positive or negative (or is there a potential for both)?

The overall impact will be positive. The potential for negative impacts will need to be carefully monitored and managed in the implementation phase. For example, some businesses must be relocated as sites come forward for development and this may have a negative impact on BME businesses or employees.

3.4 On what aspects of the Equality Duties will this impact be?

The Equality Act 2006 set up a new Commission for Equality and Human Rights tasked with encouraging and supporting the development of a society in which

- People's ability to achieve their potential is not limited by prejudice or discrimination
- There is respect for and protection of each individual's human rights
- There is respect for the dignity and worth of each individual
- Each individual has an equal opportunity to participate in society, and
- There is mutual respect between groups based on understanding and valuing of diversity and on shared respect for equality and human rights

There are statutory equality duties in respect of race, disability and gender and since October 2006 it has been unlawful to discriminate against people on the grounds of age in employment. The Council is also mindful of its duty to promote equality in respect religious belief and sexual orientation.

There are three main equality duties

- Eliminate unlawful discrimination and harassment
- Promote equality of opportunity
- Promote good community relations

	Risks	Opportunities
Race	<ul style="list-style-type: none"> • Social exclusion and residential segregation • Mismatch between housing stock and housing needs • Loss of BME businesses and jobs • Crime/fear of crime • BME organisations excluded from 	<ul style="list-style-type: none"> • Develop inclusive mixed tenure communities • Retention of BME businesses/jobs safeguarded • 1000 new jobs • Good design, creating safer communities • Selection of RSL partners including BME

	procurement process	organisations
Disability	<ul style="list-style-type: none"> • Housing and services are not accessible • Green space is not accessible • Public transport is not accessible • Crime/fear of crime • Increased isolation 	<ul style="list-style-type: none"> • Increase stock of lifetime and wheelchair accessible homes • Selection of RSL partners including supported housing organisations • Promote Inclusive Design • Good design, creating safe communities • Better access to Tottenham Marshes
Gender	<ul style="list-style-type: none"> • Worklessness and access to employment • Priced out of housing market • Crime/fear of crime • Poor pedestrian environment 	<ul style="list-style-type: none"> • 1000 new jobs • Secure by design • Improved pedestrian environment • Increase supply of affordable homes • Improved public transport • Increase in childcare provision
Sexual Orientation	<ul style="list-style-type: none"> • Crime/fear of crime 	<ul style="list-style-type: none"> • Good design, creating safer communities
Age	<ul style="list-style-type: none"> • Unsuitable housing • Lack of local services • Ageing population leads to additional pressure on public services and community facilities 	<ul style="list-style-type: none"> • Increase supply of lifetime and wheelchair accessible homes • Improved public services and facilities • Improved local service provision
Religion/Belief	<ul style="list-style-type: none"> • Loss of sites as a result of redevelopment • Suitable alternative sites are not available • Conflict arises if amenity for neighbours is compromised (e.g. by parking) 	<ul style="list-style-type: none"> • Scope to include places of worship in new mixed use developments • Better integration in new developments

3.5 Could the impact constitute unlawful discrimination?

Any impacts either positive or negative will not constitute unlawful discrimination.

3.6 What further information is required to gauge the probability and extent of the impact?

N/A

3.7 Where and how can that information be obtained?

N/A

4. Action Planning Questions

4.1 What action do we need to take to reduce negative impact?

- **Business relocations:** we are working with North London Business to mitigate any adverse impact, support business relocations and protect local employment. An equalities impact assessment and needs assessment will be undertaken for each development site in advance of any relocations.
- **S106 strategy:** a robust strategy to ensure that the IPPF requirements for affordable homes, and infrastructure are met
- **Development control:** raise awareness of IPPF requirements and ensure these are a material consideration in determining major planning applications in Blackhorse Lane
- **Joined up delivery:** the IPPF seeks to deliver 1000 new jobs. The Council is working with partners to assist non-employed residents into jobs in the Borough's growth sectors and there are also synergies with Better Neighbourhood's Initiatives on worklessness. The proposed Joint Service Centre at Essex Hall will enhance the training provision already available in the area as well as providing business support and access to employment advice and support.
- **Selection of development partner(s):** the council expects to play a lead role in the assembly of certain key sites and will need to select development partner(s) to support ongoing site assembly. Partner(s) must demonstrate compliance with equalities requirements
- **Development agreements:** the Council owns a number of sites in the area and may lever benefits on disposal through the use of development agreements

4.2 If the action proposed will not fully mitigate adverse consequences for equality, or if the decision is to take no action, why is this, and can we justify it?

N/A

4.3 Can any further action be taken to promote equality of opportunity in relation to any of the equality strands?

As part of the Better Neighbourhood's Initiative, an area manager has been appointed for the Higham Hill area. The aim of the initiative is improve the co-ordination and delivery of services at the local level, identify key local issues and mobilise the resources to deal with them, increase the responsiveness and flexibility of services to meet local needs, and engage with local residents to develop more cohesive communities. This provides a unique opportunity to engage with different equalities groups in the Higham Hill area such as the traveller's community.

4.4 Do we need to undertake any further consultation or research?

- Further consultation will be undertaken on the delivery of specific projects.
- Further EIA will be required to support the delivery of particular projects. This is a funding requirement where projects are supported by CLG and ERDF. For example, relocation of businesses at key development sites such as Sutherland Road, Kimberley Billet and the Station Hub. An initial equalities impact assessment for Sutherland Road has already been prepared for the LDA.
- Human Rights Impact Assessment to inform any future use of the Council's powers of compulsory purchase, stopping up etc
- Developers will be required to involve the local community in preparing major planning applications and submit an Access Statement for each major scheme.

- S106 Strategy to identify all major infrastructure requirements, funding mechanisms (e.g. Tariffs) and gaps
- Monitoring and evaluation of objectives identified in the Sustainability Appraisal although there are no specific equalities objectives included in the SA a number will have a positive impact on equalities target groups
- EIA to be incorporated in all cabinet/committee reports

4. Conclusions and Next Steps

The Council has a general statutory duty to:

- Eliminate unlawful discrimination and harassment
- Promote equality of opportunity
- Promote good community relations
- Encourage participation

The IPPF is fully compliant with the statutory requirements. Although it does not target particular equalities groups it will benefit a geographical area which has relatively high levels of BME, under 16, disabled people and unpaid carers. The policies articulated within the IPPF aim to build sustainable and inclusive communities. Future implementation of the policy framework will help promote equality of opportunity and enhance community understanding and participation through the construction of 2000 new homes in mixed tenure developments and by leveraging significant public and private sector investment into green infrastructure, new public open spaces and community facilities.

This EIA and subsequent monitoring reports will be published via the Council's website.

5. Action Plan

Action required	Lead Officer	Time Scale	Comments/Outcomes
Monitor involvement in future consultation/events by different equalities groups.	Judith Carlson	2016	Claire Witney is developing a mechanism for monitoring involvement of 6 equalities groups
Monitor proportion of affordable homes achieved	Tony Jones	2016	Based on habitable rooms
Monitor proportion of larger (3+ beds) affordable home completions	Tony Jones	2016	
Monitor proportion of new homes which are wheelchair accessible	Tony Jones	2016	
Monitor compliance of new homes with Lifetime Homes standards	Tony Jones	2016	
Monitor compliance with codes and standards for inclusive design (e.g. Inclusive Urban design; Inclusive Building Design; BS8300:2001; Streets for Life)	Ruth Goundry	2016	
Monitor attainment of Awards for best practice	Judith Carlson	2016	

Monitor compliance with Secured by Design	Judith Carlson	2016	SBD is not always consistent with urban design imperative for permeability
Monitor Levels of Crime	Michael Toyer	2016	
Procurement of development partners – PQQ tests compliance with Council equalities duties	Judith Carlson	2016	
Ensure development agreements specify targets which support delivery of council's equalities duties	Paul Humphreys	2016	For land disposals including land at Kimberley Billet and Sutherland Road
Monitor jobs growth in Blackhorse Lane area (estimated around 1000)	Chris Dransfield	2016	Use Experian data