

Equality Impact Assessment (EqIA) Form

In order to carry out this impact assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIA's. Please refer to these to assist you in completing this form and assessment.

SCREENING

What is the policy? (name and description)	Site Allocations DPD
Which Directorate and Service is responsible for the policy?	Place Shaping – Planning Services - LDF
Name & contact details of person(s) carrying out the EqIA:	Matthew Paterson – Civic 1, 3 rd Floor - x6082
Date of assessment:	June 2012

Stage 1: About the Policy

1. Is this a new or an existing policy?	New policy. Preparation began in 2011 and its development is following the stages set out in planning regulations. This is the final version for consultation.
2. What are the aims, objectives or purpose of the policy?	The purpose of the Site Allocations DPD is to identify spatial policy designations and to safeguard or allocate sites, outside of the Harrow Intensification Area, in line with the spatial objectives set out in the Core Strategy and the Development Management Policies DPD. It identifies the locations and sites for specific types of development, such as housing and employment, or sites to be protected through planning polices, including retail frontages and open spaces, in order to ensure the vision, objectives and spatial development strategy of the Core Strategy are given effect and implemented. It will also sets out further detail of the policy context and criteria applying to specific sites proposed for development, alongside site constraints, relevant strategic objectives to be met, identified local needs and specific infrastructure requirements.
3. What factors / forces could prevent you from achieving these aims and objectives?	The Site Allocations DPD is to be the subject of public consultation with regards to its soundness and legal compliance, and so the contents of the policies could be changed as a result of a subsequent examination in public, where any comments will be considered. Other factors that could influence the adoption and its

	implementation include a change in Government regulations regarding the plan-making process or a change in economic circumstances affecting public and private investment.
4. How does the policy contribute to the council's corporate aims and objectives?	The Site Allocations seek to give effect to Harrow Core Strategy, national and regional policy and the local community's aspirations for the Borough, as set out in the Harrow Sustainable Community Plan (2009) and other Council and Strategic Partnership strategies, such as the Climate Change Strategy and the NHS Harrow Investment Plan. The document is key to delivering the corporate objective of united and involved communities and supporting our town centres and businesses by delivering sustainable mixed & balanced communities in Harrow through ensuring development is located in the right place, at the right time, to meet the needs of the community and economy.
5. Who is intended to benefit from this policy and in what way?	The allocations are intended to manage development and change in Harrow. They will therefore play a significant role in shaping the Borough's future environment through allocating sites for particular uses. They will allocate sufficient sites for houses and jobs to meet the needs of Harrow and London's growing population, in a more pro-active and sustainable manner, ensuring we maximise the benefits to be achieved through new development (regeneration, renewal, and the provision of social and physical infrastructure) and minimise potential impacts by controlling the location of new development, the loss of open space, the release of business land etc. All those with an interest or stake in the future enjoyment, development or management of Harrow, including local residents and businesses, landowners, Government organisations, trusts and charities, visitors and volunteers stand to benefit.
6. Is responsibility for the policy shared with another department, authority or organisation? If so: <ul style="list-style-type: none"> • Who are the partners? • Who is responsible for the policy? 	The development of the policy is the responsibility of the LDF team, but it is a corporate document that requires the support, involvement and ownership of all key stakeholders responsible for making development happen and delivering the services and infrastructure needed to support new and existing communities. Once adopted, the Council as a whole are responsible for its implementation through the consideration of planning applications, the delivery of infrastructure and services and the management of our resources.
Stage 2: Collecting Evidence	
7. What data or benchmarking	<u>DPDs must</u> be based upon a robust and up-to-date evidence base. These have been prepared either internally or externally by experts in their respective fields and there scope can either be focused on the

<p>information is available to facilitate the screening of this policy?</p> <ul style="list-style-type: none"> • Results from the Place Survey • Customer Satisfaction Surveys • Local or national research • Complaints or compliments received • CAA, liP or other assessments 	<p>borough, the west London sub-region or London level depending on the nature of the study. All the evidence base studies are published on the Council's website for independent review, and cover a number of economic, environmental and social issues such as demographics, employment land, retail and open spaces and leisure, infrastructure, viability, flooding, Harrow character, and housing, including land availability and housing need. All of these help underpin the policies and objectives within the DPD to ensure the document is as robust and credible as possible</p> <p>To further support the development of DPD policies, each policy is subject to Sustainability Appraisal (SA), in accordance with international and national procedures. The purpose of SA is to assess the environmental, social and economic impacts of each policy to determine whether any adverse effects can be avoided, remedied or mitigated and any positive impacts maximised. This findings of the SA are published alongside the strategy, so that people are able to make informed decisions about the benefits or otherwise of any policy approach being promoted. It also enables people to comment on the SA process and its findings as well.</p> <p>In addition to the above, the DPD also draws on other key data including, monitoring data collected in the course of monitoring the effectiveness of Council's current planning policies (reported in the Annual Monitoring Report), the Vitality Profiles, which contain information on population demographics, and the comments we received to informal and formal consultation in the course of preparing the document. All of this information is readily available on the Council's website.</p>
<p>8. Have you undertaken any consultation on this policy?</p> <p>Yes, for a six week period in May/June 2011</p>	
<p>If yes, who was consulted? (this may include staff, members, unions, community / voluntary groups, stakeholders, residents and service users)</p> <p>The consultation was widely advertised, and letters or emails were sent to everyone on the LDF database, including residents, community group, developers, businesses and other government and statutory agencies. Public roadshows were also held to ensure the general public could have a say on the plan.</p>	

Stage 3: Assessing Impact

10. Considering the information / data from your research or/and consultation, is there any reason to believe that any adverse impact occurs or has the potential to occur on any equality group?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
			X		X		X		X		X		X	

The Site Allocations DPD has no significant negative impacts on any equalities group, however a number of positive impacts have been identified on all groups. For details please see section 14.

10A. What measures are you going to take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring

Actions identified to eliminate/reduce adverse impact

Although no negative effects have been identified, monitoring schedules are in place for each policy to ensure that positive outcomes are achieved regarding Social, Environmental, and Economic Goals, which, as illustrated below, benefits many equalities groups.

11. Is there any evidence or concern that **direct discrimination** may occur with reference to anti discrimination legislation?

Direct discrimination - occurs when a person is treated less favourably than others on the grounds of their age, disability, gender, race, religion or belief, or sexual orientation. Refer to main guidelines and toolkit for examples of direct discrimination.

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
			X		X		X		X		X		X	

If yes, explain which equality group(s) this affects? (You are encouraged to seek Legal Advice)

12. Is there any evidence or concern that **indirect discrimination** may occur? If yes describe this below and whether you can credibly justify continuing with the policy in terms of the benefits of its wider aims?

***Indirect discrimination** - occurs when a rule, condition or requirement, which applies equally to everyone, has a disproportionately adverse effect on people from a particular equalities group when there is no objective justification for the rule. Refer to main guidelines and toolkit for examples of indirect discrimination.*

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
		X		X		X		X		X		X		X

If yes, explain which equality group(s) this affects? (You are encouraged to seek Legal Advice)

13. Is the policy likely to affect relations between certain groups, for example because it is seen as favouring a particular group or denying opportunities to another?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
		X		X		X		X		X		X		X

If yes, explain which equality group(s) this affects?

14. If you have any further evidence or concern the potential impact the policy may have on a particular group(s), explain these below. This could be positive or negative. (if neither positive or negative, insert none)

	Positive	Negative
Allocating Retail Frontages	Positive effect, mainly on Age and Disability groups. By ensuring core services and retail functions are retained in town centres, which are also the areas most accessible by public transport, will help reduce the number of trips people have to make to different areas to access a range of shops and services, and thus by concentrating these services and shops, will	

	make it easier for those less mobile to complete their day to day activities.	
Allocating Neighbourhood Parades	Positive effect, especially on the Age and Disability groups, and Socio Economic Inequality. This is due to ensuring shops and services are retained in accessible locations throughout the Borough, negating the need for people to travel long distances for these services, which could involve costly trips by car or public transport.	
Allocating Primary Shopping Areas	Positive effect, mainly on Age and Disability groups. As with allocating frontages, By ensuring core retail functions are retained in town centres, which are also the areas most accessible by public transport, will help reduce the number of trips people have to make to different areas to access a range of shops, and thus by concentrating these shops it will make it easier for those less mobile to complete their day to day activities	
Change to Strategic Industrial Location boundary	No effect on Equalities groups	
Changes to Industrial and Business Use Boundaries	No effect on Equalities groups	
Allocating Sites for Housing and Mixed Use Development (including retail)	Positive effect on all groups, by ensuring sufficient housing is provided to cater for Harrow's growing population that is suitable and accessible for all. Similarly, the provision of shops and services as part of mixed use developments will benefit all, especially older people and disabled people by ensuring services are located close to where they live, minimising the need to travel long distances for essential services.	
Allocating Open Space and amending Open Space boundaries	Positive effect on all groups, especially disabled groups through improving access to open space and recreational areas.	

Allocating areas of Local Wildlife Interest (SINCS)	No effect on Equalities groups.					
Allocating sites for Sports use	Positive effect, especially on the Age group, by providing facilities, especially for young people in the form of play space and other recreational opportunities.					
Allocating sites for Community Facilities	Positive effect on all groups, by providing community facilities accessible to all, which can help build stronger communities and improve relations between different groups, as well as providing valuable services and opportunities					
<p>15. How does the policy conform to the requirements of the Public Equality Duties, which require all council functions and services to:</p> <ul style="list-style-type: none"> • promote equality of opportunity, • eliminate discrimination • promote good relations between different equality groups <p>If the answer is none or N/A please state why? What amendments could be made?</p>	<p>The Site Allocation DPD promotes equality of opportunity through encouraging growth and development in areas of good public transport accessibility, improved community facilities accessible to all and access to new jobs and educational facilities throughout the Borough by allocating appropriate sites. As above, these opportunities will benefit all, and so will help improve social inequality and thus help reduce discrimination and promote good relations between groups – a major cause of which is inequalities. This is furthered by the allocations for enhanced community facilities across the Borough.</p>					
16. Has an impact been identified?	Yes	X	If yes, is the impact positive or negative?	Positive	X	Go to Q17
	No (go to Q17)			Negative		Go to Q16A
16A. If there is a negative impact on	Yes				Yes	

any group(s), is that impact unlawful?	No		If illegal, take legal advice	If legal, is the impact intended?	No	
17. Have you received any complaints or compliments about the policy? If so, provide details.	Formal public consultation was undertaken in May 2011 for a period of 6 weeks, and a number of comments were received, both positive and negative. These have been assessed and changes made to the document as necessary. All representations received and the Council's response to these are published on the LDF pages of the Council's website. This is the second and final consultation that will take place on the draft document.					
18. What monitoring is in place to check the effects of the policy on equality groups?	There are monitoring targets for all policies, consistent with national indicators and local Harrow indicators, to ensure the policies continue to perform as expected, which will benefit all equalities groups.					
19. How will the results of any monitoring be analysed, reported and publicised?	They will be published through the Annual Monitoring Report.					
20. What monitoring measures need to be introduced to ensure effective monitoring of the policy?	None					
21. When will the policy be reviewed?	Yearly					
Decision						
22. On the basis of your answers so far, what is the potential for differential impact?	High <i>(Large adverse impact on equality groups)</i>		Medium <i>(Some adverse impact on equality groups)</i>		Low <i>(Low potential for adverse impact on equality groups)</i>	
					X	
Mark with an X	Continue on to Part 2 for a full assessment.				Go to Stage 4 for any actions to improve policy and sign off.	

Stage 4 Making Adjustments (Improvement Action Plan)

32. List below any recommendations for action that you plan to take as a result of this impact assessment. This will include any actions identified throughout the EqIA.

There are no recommended actions to take.

This EQIA has examined whether the DPD and associated consultation will/have adverse impacts or discriminate against different groups in the community. The allocations for town centre’s frontages, housing and infrastructure will have significant positive impacts for the wider community, including all equalities groups, by ensuring all people have ready access to local services.

Overall the DPD will contribute directly and indirectly to the delivery and accessibility of new homes, schools, employment opportunities, infrastructure facilities, and to a more sustainable form of development. Based on the assessment above, it is not considered that any mitigation measures are required. The Council does, and will continue, to monitor the implementation and impact of the local development plan through the Annual Monitoring Report. In this context, each strategic policy also contains key monitoring indicators which help provide a robust basis for future monitoring and assessment.

Stage 5 – Reporting Results

We are required to ensure all completed EqIA’s will be put onto the Council’s website under the equality and diversity section and they will also be made available to members of the public on request.

33. Methods of publication – how will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc

[Council website and the Harrow consultation portal](#)

Stage 6 - Monitoring

It is important to monitor the actions arising from the impact assessment to ensure improvement to policy.

34. How will the actions be monitored to ensure improvement to the policy?

[Through the Annual Monitoring Report](#)

Stage 7 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG), who will discuss and agree the actions in the Improvement Plan.

Once agreed the actions from the Improvement Plan need to be included in Departmental Business Plans for implementation.

35. Which group or committee considered the action plan and agreed the actions to improve the policy? If you agreed no further action as a result of the EQIA, explain why?

The assessment identified that no adverse affects are likely to arise as a result of implementing the policies of the DPD. Positive effects were however identified which should be maximised.

Signed: (Lead officer completing EqIA)	M Paterson, LDF Team Leader	Signed: (Chair of DETG)	S Kelly, Chair of Place Shaping Equalities Working Group
Date:	20 June 2012	Date:	21 June 2012