

# London Borough of Haringey

Haringey Local Development Framework

Core Strategy Submission

Equalities Impact Assessment

March 2011

---



[www.haringey.gov.uk](http://www.haringey.gov.uk)

This page is intentionally blank

# Contents

1	Introduction .....	1
1.1	Purpose of this report.....	2
1.2	The extent of the EqIA.....	3
2	Identifying Relevant Plans & Programmes .....	4
3	The Equality Baseline.....	7
3.1	Demographical Context.....	7
3.2	Gender .....	9
3.3	Ethnicity .....	10
3.4	Age .....	12
3.5	Religion/Belief .....	13
3.6	Disability .....	14
3.7	Sexual Orientation .....	14
4	Issues and Opportunities .....	16
5	Haringey's Core Strategy .....	17
6.	Recommendations and Comments .....	31
6.1	Core Strategy.....	31
6.2	Consultation.....	31
6.3	Comments .....	32
	Appendix 1 – Legislation .....	34
	Appendix 2 - Additional References .....	35
	Appendix 3 – Consultation questions .....	36

# 1 Introduction

---

The London Borough of Haringey has prepared a Core Strategy for the period 2011 - 2026. The purpose of the Core Strategy is to provide a framework for making decisions on planning applications and to guide development to suitable locations within the borough.

This Equalities Impact Assessment (EqIA) has been produced alongside the Core Strategy and is an ongoing process. This document has taken into account the borough's cultural and demographic diversity during the development of the Core Strategy.

A Sustainability Appraisal has also been carried out on the Core Strategy. The primary output from the 2008 Scoping study was a sustainability framework and this framework was used to assess the sustainability of the Core Strategy, which is the central part of the group of planning documents, as the policies are developed. The purpose of the EqIA is to thoroughly and systematically assess the equalities impact of the Core Strategy by assessing the likely implications of the planning policies when they are implemented with regard to equality issues. It will attempt to identify the direct and non-direct discrimination of the 17 core policies and has fed back into the writing of the policies as the Core Strategy was developed.

This final Equalities Impact Assessment has been published alongside the Core Strategy for the submission stage (to the Secretary of State).

## 1.1 Purpose of this report

The purpose of this EqIA is to ensure that the policies and objectives in the Core Strategy address equalities. This proactive approach meets the aspirations of the Council's Equalities Agenda and its statutory obligations under the Equality Act 2010. The Act establishes a new general duty to have due regard for the following:

- Eliminating unlawful discrimination in the provision of goods, facilities or services;
- Promoting equality of opportunity; and
- Promoting good relations between different groups.

| In relation to people who have the following characteristics protected under the Act: age, disability, pregnancy and maternity, race, sex, religion or belief, sexual orientation and in part to marriage and civil partnerships.

These general duties are supplemented by specific duties which include the need to monitor functions and policies, both new and existing, for adverse impacts and act on the results.

This EqIA identifies the key issues and processes that have been considered in the development of the Core Strategy. It is based on six equality strands, which are age, disability, gender, ethnicity, religion or belief and sexual orientation. It has recommended actions that, if adopted, will help Haringey to anticipate and address potential negative consequences of the policies and identify opportunities for promoting equality.

## 1.2 The extent of the EqIA

The EqIA ensures that equalities issues are addressed from all angles in the development of the Core Strategy. This report highlights the equality and diversity considerations by analysing the demographics of the borough and, where available, any relevant monitoring and consultation responses carried out by Haringey and the Planning Policy Team. The work has supported the preparation of the Core Strategy and has tried to pre-empt the possibility that the development of the Core Strategy could potentially affect some groups adversely. It also has enabled Haringey to review its policies and consider alternative ways of achieving the same ends.

For the purpose of this Assessment, target groups have been identified as follows:

- Women;
- Black, Asian and ethnic minority people including traveller communities;
- Young and older people;
- Disabled people;
- Lesbian people, gay people, bisexual people and transgender groups (LGB&T); and
- People of different religion/belief groups.

These will be referred to as the equalities protected characteristics as defined by the Equality Act (2010) because they have either been historically discriminated against, are vulnerable and/or people who are considered at risk of **social** and **economic** exclusion within society.

The EqIA scoping methodology followed three key stages:

- Desk-based analysis of baseline material;
- Evaluation of differential key issues and opportunities facing equality strands within the borough; and
- Recommendations for the development of the Core Strategy, associated consultation events and boroughs EqIA approach.

Each of these three key stages were repeated for each stage of developing the Core Strategy and this report was updated at every stage of the development of the Core Strategy to produce this final EqIA. The report has also fed into the sustainability framework whilst developing the Core Strategy.

## 2 Identifying Relevant Plans & Programmes

The London borough of Haringey has an established set of local Plans, Policies and Programmes (PPP) in regards to Equality. The following table provides a synopsis of the key plans and schemes which are already in place.

Relevant Plans, Policies and Programmes		
Scale	PPP	Main aims of document
Regional	The London Plan (2008). (Consolidated with Alterations since 2004.	<p>The London Plan, adopted by the Greater London Assembly in 2008, provides the strategic planning framework for London. A primary objective of the London Plan is to promote social inclusion to give all Londoners the opportunity to share in London's future success, and to tackle deprivation and discrimination. The London Plan identifies a number of issues of primary concern and these are the need to:</p> <ol style="list-style-type: none"> <li>1 Tackle unemployment by increasing access to high quality jobs through training, advice and other support, particularly for those women, young people and minority ethnic groups most in need;</li> <li>2 Tackle concentrations of deprivation with the aim of ensuring that no one is seriously disadvantaged by where they live within 15-20 years;</li> <li>3 Tackle homelessness;</li> <li>4 Tackle discrimination by building on the economic and cultural strengths of London's diversity and build a London that is more accessible to disabled people;</li> <li>5 Provide a framework for the spatial policies and decisions of learning, health, safety and other key social and community services; and</li> <li>6 Ensure that local communities benefit from economic growth and are engaged in the development process.</li> <li>7 Understand the needs and priorities of equality strand groups to respond effectively to their diverse needs and reduce levels of social exclusion.</li> <li>8 Highlight the importance of improving the quality of life of the poorest Londoners by improving their economic base and reducing barriers to employment opportunities.</li> <li>9 Set strengthened objectives to include the provision of health and childcare facilities as well as play space within key social infrastructure requirements, and to directly address health inequalities.</li> </ol>
Regional	Draft replacement of the London Plan (2009)	<p>The draft replacement sets out an integrated economic, environmental, transport and social framework for the development of the capital over the next 20-25 years.</p> <p>The document has recently undergone the process of an Examination in Public of the proposed policies. The Inspectors Report has not been received as yet.</p> <p>One significant amendment is to the London Boroughs Housing Targets. Haringey target has increased from 680 per annum to 820, an increase of 140 units per annum.</p>

Relevant Plans, Policies and Programmes		
Scale	PPP	Main aims of document
National  (recent change, published March 2010)	Planning Policy Statement 5  Planning for the Historic Environment	<p>The policies and principles set out in this statement also apply to the consideration of the historic environment in relation to the other heritage-related consent regimes for which planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>Those parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest are called heritage assets.</p> <p>Some heritage assets possess a level of interest that justifies designation and particular procedures apply to decisions that involve them. PPS5 covers heritage assets that are not designated but which are of heritage interest and are thus a material planning consideration.</p>
Local	Haringey Public Duties Scheme (2005 – 2008).  Dec 2006	<p>Haringey's approach to equal opportunities is 'Mainstreaming'. The approach was formulated in a policy document, "<i>From the Margins to the Mainstream</i>", adopted in 1992.</p> <p>'Mainstreaming', in Haringey, means that equal opportunity is made integral to policy making, planning, designing and delivering services, in employment of practices and in managing performance of activities at every level of the Council.</p> <p>The move towards a generic approach to equality, such as this Scheme embraces the duties under all the anti-discrimination legislation, bringing them under a single strategic and operational framework.</p>
Local	Disability Local Access Guide (2005)	<p>Haringey is committed to implementing the requirements of the Disability Discrimination Act (DDA) 1995, now incorporated into the Equality Act 2010. Part 3 of the Disability Discrimination Act (DDA) came into force on 1 October 2004, requiring that adjustments needed to be put in place to improve physical access to buildings used by the public.</p> <p>Haringey is committed to creating an environment where all disabled people can participate fully as equal citizens. The borough aims to promote inclusiveness through providing facilities that can be accessed by all.</p>
Local	Sexuality Equality Related Review Action Plan 2004-7	<p>The Employment Equality (Sexual Orientation) Regulations 2003 – These Regulations, now incorporated into the Equality Act 2010, apply to all employment and vocational training and include recruitment, terms and conditions, promotions, transfers, dismissals, and training. Within the Regulations, sexual orientation is defined as:</p> <ul style="list-style-type: none"> <li>▪ Orientation towards same sex (lesbians and gay men);</li> <li>▪ Orientation towards opposite sex (heterosexual); and</li> <li>▪ Orientation towards same sex and opposite sex (bisexual).</li> </ul> <p>Haringey have since created a Sexuality Equality Related Review Action Plan which focuses on five key areas</p> <ol style="list-style-type: none"> <li><b>1</b> Commitment To Promotion &amp; Achievement Of LGBT Equalities;</li> <li><b>2</b> Consultation Arrangements;</li> <li><b>3</b> Partnership Working;</li> <li><b>4</b> Performance Management; and</li> <li><b>5</b> Employment: To develop and implement policy and training for staff</li> </ol>

Relevant Plans, Policies and Programmes		
Scale	PPP	Main aims of document
		and managers to implement Employment.
Local	Equality Opportunities Policy Haringey Council	<p>The council has legal responsibilities to promote equal opportunities through the Equality Act 2010, now incorporating provisions of the following pieces of legislation:</p> <ul style="list-style-type: none"> <li>▪ Disabilities Discrimination Act (1995);</li> <li>▪ Race Relations Act 1976 (and its amendments of 2000); and</li> <li>▪ Sex Discrimination Act 1975.</li> </ul> <p>The overall goal is to create: ' A Council which ensures the provision of services appropriate to local need, valued by all and delivered by staff who reflect the diverse communities we serve'.</p> <p>The aims of the Council in respect of equal opportunities are threefold: -</p> <ol style="list-style-type: none"> <li><b>1</b> To promote and demonstrate fairness and equality of opportunity in the provision of services;</li> <li><b>2</b> To promote and demonstrate fairness and equality of opportunity in the employment of staff; and</li> <li><b>3</b> Achieve measurable progress against agreed targets in mainstreaming equal opportunities throughout the Council and all its operations.</li> </ol>

## 3 The Equality Baseline

---

### 3.1 Demographical Context

In order to understand the likely equality impacts for Haringey Council in the development of its Core Strategy there needs to be an understanding of the demographics of the borough and the stakeholders that will be affected e.g. residents, businesses, visitors and people who work (but do not reside) in the borough.

The current population is estimated to be around 228,837<sup>1</sup> with approximately 3,548 known asylum seekers. The 2001 Census illustrated that Haringey's population had grown by 8.6% since 1991 and it is projected that it will grow by a further 5.4% by 2016 to 233,125. There are approximately 55,600 children and young people under the age of 20 living in the borough. By 2026 it is anticipated that the population will have increased to over 260,000, an increase of over 15%.

Haringey has the sixth highest proportion of black and ethnic minority communities (48.9%). The top five are: Brent - 65.4%, Newham - 63.9%, Tower Hamlets - 52.4%, Hackney - 51.6% and Ealing - 50.1%<sup>2</sup>.

The borough continues to face inner London crime rates and remains a 'high volume' crime area. Crime is one of Haringey's residents' top concerns.

Haringey is the fifth most deprived district in London after Newham, Tower Hamlets, Hackney and Lambeth. The definition of deprivation relates to Income, Employment, Health, Disability, Education, Skills and Training, barriers to Housing and Services, Living Environment and Crime according to the Index of Multiple Deprivation 2004.

The borough has a clear east/west divide, see Figure 1, with 50 per cent of the Super Output Areas (a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales) in Tottenham amongst the 10 per cent most deprived in the country compared to only 10 per cent in the west.

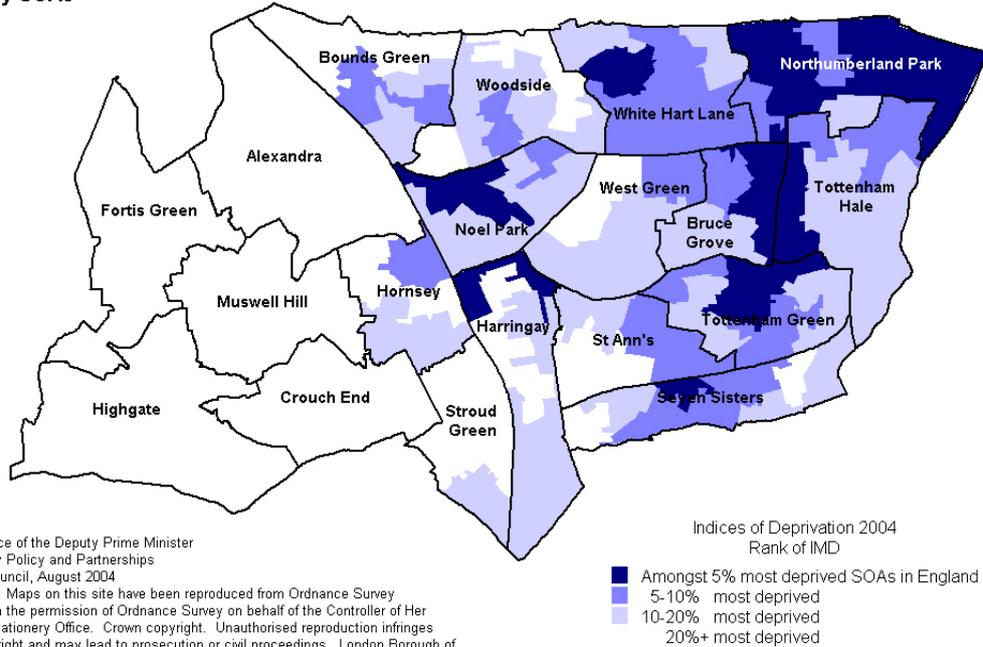
---

<sup>1</sup> Source: 2007 Round of GLA Demographic Projections – PLP High

<sup>2</sup> Source: 2001 Census

**Figure 1 Number and distribution of wards with SOAs in bottom 25% and 10% most deprived**

**Indices of Deprivation 2004  
Rank of IMD  
Haringey SOAs**



Under a third of households in the borough have no earned income and in parts, such as Seven Sisters, the average annual household income is below the poverty line. The percentage of economically active (i.e. those working or actively seeking work) population unemployed in March 2006 was 7.7%, which is more than twice the National average of 3.6 per cent. Table 1 gives a breakdown of the reasons that people are unable to seek and/or work in Haringey.

**Table 1 Haringey - Economic Inactivity <sup>3</sup>**

<b>Economically inactive</b>	<b>No. of People</b>	<b>Percentage</b>
Retired	13,127	23.4
Student	13,350	23.8
Looking after home/family	11,689	20.8
Permanently sick or disabled	8,530	15.2
Other	9,478	16.9
Not aged 16-74	53,807	100.0
Percentage inactive compared with Population of 233,125	53,807	23%

High population mobility and housing shortages pose key challenges in developing cohesive and sustainable communities. There are currently around 5,000 households in temporary accommodation and demand for housing continues to grow. The proportion of Council housing is above the national average at 20 per cent. A substantial proportion of the stock (54 per cent) is in medium and high rise flats. There is a low level of owner-occupation and a high level of renting in social housing compared with the London average.

### **3.2 Gender**

According to the Office of National Statistics (ONS) the male to female ratio is approximately 45:55. The total is likely to have risen since the 2001 census to 228,837<sup>4</sup>.

**Table 2 Haringey Gender Composition<sup>5</sup>**

<b>Gender</b>	<b>No. of People</b>
Males	103,666 (45%)
Females	112,841 (55%)
ALL PEOPLE	216,507

---

<sup>3</sup> Source: 2001 Census: *Standard Tables*

<sup>4</sup> 2007 Round of GLA Demographic Projections – PLP High.

<sup>5</sup> Source: 2001 Census: *Standard Tables*

It's often said that Haringey is an outer London borough with inner London challenges one of them being unemployment. The percentage of male claimants for Job Seekers Allowance in Haringey is 8.3% which is the third highest in London behind Tower Hamlets (9.1%) and Hackney (9.2%). The female claimant rate is 4.2% in Haringey and it is the third highest in London behind Lambeth (4.3%) and Hackney (4.7%).

The Council has produced its Domestic Violence Strategy (2004-08) and evidence from the annual Haringey Crime Audit indicates that it accounts for almost 30% of all reported violent crime in the borough. A report produced by the Home Office about Crime in England and Wales indicated that one quarter of all violent crime reported is violent attacks on women by their partners and ex-partners.

### 3.3 Ethnicity

Nearly half of the population come from black and ethnic minority communities, including Greek and Turkish Cypriot, African, African Caribbean, Indian, Pakistani, Bangladeshi and Irish. The 2001 Census found a total of 36,336 migrants in the borough.

A large number of refugees and asylum seekers (Kurdish, Somali and Kosovan) have settled in Haringey. More recently the borough has seen an increase in the number of people arriving from Eastern Europe. Table 3 shows the ethnic origins of Haringey residents and makes comparison with London and England.

**Table 3 Ethnic Groups in Haringey<sup>6</sup>**

Ethnic Group	Haringey		London	England	London Rank
	Number	%	%	%	(of 33)*
White - British	98,028	45.28	59.79	86.99	28
White - Irish	9,302	4.3	3.07	1.27	7
Other White	34,752	16.05	8.29	2.66	3
<b>Sub Total White</b>	<b>142,082</b>	<b>65.63</b>	<b>71.15</b>	<b>90.92</b>	<b>22</b>
White & Black Caribbean	3,205	1.48	0.99	0.47	4
White & Black African	1,551	0.72	0.48	0.16	4
White & Asian	2,329	1.08	0.84	0.37	5
Other mixed	2,761	1.28	0.85	0.31	4
<b>Sub Total Mixed</b>	<b>9,846</b>	<b>4.56</b>	<b>3.16</b>	<b>1.31</b>	<b>2</b>

<sup>6</sup> Source: ONS 2001 Census - Table KS06

Ethnic Group	Haringey		London	England	London Rank
	Number	%	%	%	(of 33)*
Indian	6,171	2.85	6.09	2.09	18
Pakistani	2,046	0.95	1.99	1.44	19
Bangladeshi	2,961	1.37	2.15	0.56	10
Asian or Asian British - Other	3,348	1.55	1.86	0.48	16
Sub Total Asian & Asian British	14,526	6.72	12.09	4.57	21
Caribbean	20,570	9.50	4.79	1.14	5
African	19,879	9.18	5.28	0.97	5
Black or Black British - Other	2,928	1.35	0.84	0.19	7
Sub Total Black or Black British	43,377	20.03	10.91	2.3	6
Chinese	2,444	1.13	1.12	0.45	17
Other Ethnic Group	4,232	1.95	1.58	0.44	12
Sub Total Chinese or Other Ethnic Group	6,676	3.08	2.7	0.89	13
<b>TOTAL</b>	<b>216,507</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	

\* Highest % = 1

It is estimated that 193 languages are spoken within the borough and almost half of all pupils in Haringey schools speak English as an additional language at home.

The Council ensures that it makes information available in a range of the most frequently required community languages for communities whose first language is not English by:- having a high quality interpreting service that provides a range of community languages for service users; keeping under review the changing demands for translated materials; providing translated information in the most frequently required languages and offering learning opportunities for communities whose first language is not English.

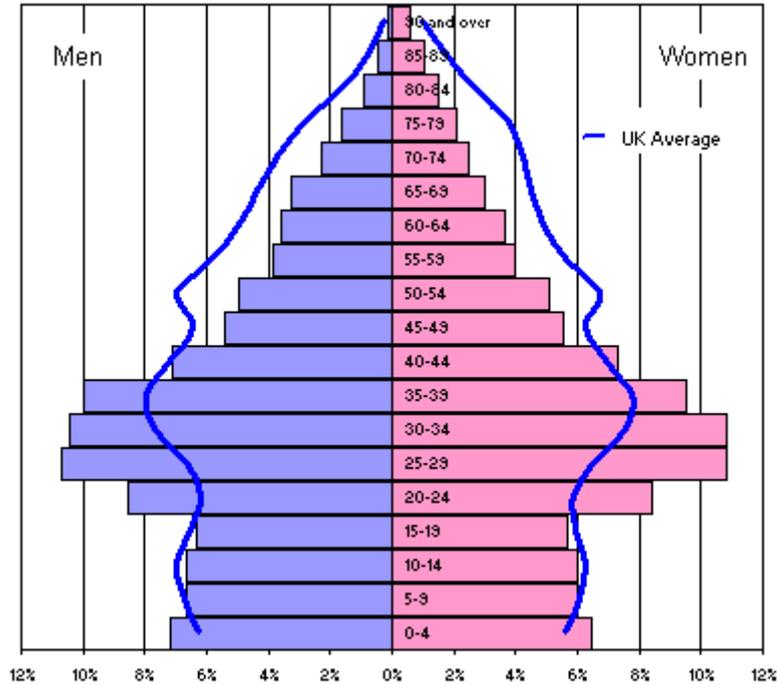
The Audit Commission stated in its Corporate Performance Assessment report that: “community cohesion, user focus and diversity are significant strengths for the Council. They are at the heart of decision-making and are successfully threaded through its ambitions, priorities, culture and working practices.”

In addition, The Audit Commission found that 76% of residents agree that the local area is a place where people from different backgrounds get on well together.

### 3.4 Age

The age structure is similar to that of London as a whole however there is a marked difference in the distribution of age across the borough. The east of the borough tends to have a younger population whilst the west has an older population.

**Fig 2 Age Distribution by Gender**



The percentages on the pyramid represent the percentage of 'all males' (to the left) and the percentage of 'all females' (to the right) that are in that age group.

Young people are more likely to be claiming Job Seekers Allowance (JSA) in Haringey than any other age group - the JSA claim rate for economically active people aged 16 to 24 is 18.0 per cent. This is compared with claim rates of 5.4 per cent and 6.3 per cent for people aged 25 to 44 and 45 to 59(females)/64(males) respectively.

In a recent report produced by Age Concern (October 2006) examples of potential inequality experienced by different age groups were identified as follows:

- Potential discrimination against carers as by 2026 more than 10% of the population is projected to be over 75 years old. This is likely to impact on employment as caring rates are highest between 45 and 64, although one in five carers are aged 65 and over;
- Restricting access to the workplace for example by enforced or incentivised retirement;

- Failing to offer choices in health and social care, and making assumptions that older people might not want the sorts of life chances that younger people do;
- Making the assumption that it is “natural” for older people to have lower expectations, reduced choice and control and less account taken of their views; and
- Conversely viewing younger people as aggressive, out of control, uncaring and threatening.

### 3.5 Religion/Belief

Christianity is the main religion (50%) in Haringey. Details of the total population religion/belief are indicated in the Table 4.

**Table 4: Religion/Belief<sup>7</sup>**

Religion/Belief	Percentage
Christian	50.07
No religion	19.98
Religion not stated	12.09
Muslim	11.26
Jewish	2.64
Hindu	2.05
Buddhist	1.05
Other religions	0.52
Sikh	0.33

Religious discrimination has become more prominent by the rise in Islamophobia, particularly since September 11 and July 7 bombings. There is a need for heightened sensitivity with regard to the Muslim community, and the media’s coverage of the Finsbury Park Mosque.

---

<sup>7</sup> Source: 2001 Census

### 3.6 Disability

The Disability Discrimination Act 2006 (DDA) defines disability as:

*“A person has a disability if he or she has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities”*

In Haringey 7.4 per cent of people provide unpaid care, which is slightly lower than the London average of 8.5 per cent. Also 5.8 per cent of Haringey residents between the ages of 16 and 74 are either permanently sick or disabled compared with the London average of 5.0 per cent<sup>8</sup>.

The Council is working towards removing barriers and making adjustments to overcome:

- Prejudice and stereotypes;
- Inflexible organisational procedures and practices;
- Inaccessible information;
- Inaccessible buildings; and
- Inaccessible transport.

### 3.7 Sexual Orientation

There is no definitive figure available for the number of gay men, bisexuals and lesbians in the United Kingdom because this data is not included in the national census. Several sociological and commercial surveys have been carried out and these have produced a wide range of estimates. The government is using the figure of 5-7% of the gay and lesbian population and Stonewall feels that this is a reasonable estimate.

*Breaking the Chain of Hate*, the National Advisory Group's 1999 national survey examining levels of homophobic crime and community confidence towards the police service, confirmed these statistics:

66% of 2,500 respondents stated that they had been a victim of a homophobic incident only 18% of all homophobic incidents were reported 70% were fearful of reporting future homophobic incidents. Reasons for not reporting included:

- Lack of confidence in the police;
- Anticipated negative reaction;
- Fear of being charged with gay offence;
- Fear of being outed;
- Fear of retribution; and

---

<sup>8</sup> Source: 2001 Census, Office for National Statistics

- Acceptance of violence and abuse.

It is suggested that the Council consider the introduction of a confidential reporting service for lesbian, gay, bisexual and transgender staff to report harassment/bullying. This will generate some baseline data and also assist in determining policy and operational priorities.

## 4 Issues and Opportunities

---

The Council's Equal Opportunities Policy states that "Haringey is like a global village...It is one of the most diverse parts of one of the busiest capital cities in the world". However, diversity and disadvantage co-exist in Haringey which gives rise to issues of social exclusion and discrimination and the following have been acknowledged by the Council:

- The borough continues to rank among the most deprived local authority areas in the country;
- The borough recognises the unacceptably high levels of local unemployment and particularly high levels of long term unemployment;
- The impact of unemployment is disproportionate on particular sections of the community, including black and ethnic minorities, young and lone parents;
- Access to jobs and training is impeded by the borough's performance on measures of educational achievement;
- There are high levels of local homelessness;
- Polarisation exists in the borough as a consequence of the concentration of the bulk of Haringey's disadvantaged residents in a relatively small area (Northumberland Park Ward);
- The transience of a significant proportion of the population, again largely concentrated in the areas of deprivation to the east;
- There has been a prevalence of "low pay" as well as "no pay" in local employment;
- The heightened and particular deprivation levels of new groups of Asylum Seekers and refugees; and
- Haringey's existing cohesion is taken into account during the development of the EqIA along with cultural values and norms during consultation and development of the Core Strategy. Haringey seeks to build upon the existing strength of cross-cultural relations in the borough.

## 5 Haringey's Core Strategy

---

The vision of the Core Strategy is:

To ensure Haringey is *a place for diverse communities that people are proud to belong to*. All agencies will work together to enable people to be at the heart of change and to improve their quality of life in an environmentally, economically and socially sustainable way.

The six strategic outcomes identified in the Sustainable Community Strategy to achieve this vision are set out below:

- People at the Heart of Change;
- An environmentally sustainable future;
- Economic vitality and prosperity shared by all;
- Safer for all;
- Healthier people with a better quality of life, and
- People and customer focused.

In the Core Strategy Issues and options we asked for your views on the key planning issues and challenges that face the development of Haringey over the next 15 years and possible options for dealing with them. We presented the document to a wide range of stakeholders and community groups. We also engaged with other service departments in Haringey, the business sector, the public sector, residents groups, amenity societies and area forum. Consultation included specific contact with faith groups and representatives from other equality strands. We did not have direct contact with representatives from the LGBT or disabled communities which needs to be rectified for a more inclusive final Core Strategy.

The development of the Core Strategy contributes to achieving the vision and objectives of the Haringey Sustainable Community Strategy (2007) and 12 overarching preferred planning policies were identified. These were divided into:

Managing Growth	Design
Housing	Conservation
Environment	Green Infrastructure
Movement	Health and Wellbeing
Employment	Culture and Leisure
Town Centres	Community Infrastructure

The Core Strategy Preferred Options also underwent a comprehensive consultation programme; this included specific consultation with representatives from all the six equality strands. Full details of this are available in the Preferred Options Consultation Report, 2009. We took all responses,

along with background information and evidence and have developed our proposed submission approach for the Core Strategy.

In line with national and regional planning policy, these consultation responses have now been developed into 17 policies within the Core Strategy proposed submission draft:

- SP1 Managing Growth;
- SP2 Housing;
- SP3 Provision of land for Gypsies and Travellers;
- SP4 Working Towards a Low Carbon Haringey;
- SP5 Water Management and Flooding;
- SP6 Waste and Recycling;
- SP7 Transport;
- SP8 Employment;
- SP9 Improving Skills and Training to support access to jobs and community cohesion and inclusion;
- SP10 Town Centres;
- SP11 Design;
- SP12 Conservation;
- SP13 Open Space And Biodiversity;
- SP14 Health and Well-Being;
- SP15 Culture and Leisure;
- SP16 Community Infrastructure; and
- SP17 Delivering and Monitoring The Core Strategy.

A further version of the Core Strategy – the “Proposed Submission Draft” was written and comprehensive consultation carried out, including with representatives from all the equalities strands. Comments received have been used to amend this document, producing the final draft for submission to the Secretary of State and for presentation to an independent Planning Inspector for the Examination in Public.

The following are brief summaries of the 17 policies. The full policies are set out in the final Draft Core Strategy

### **Strategic Policy 1 - Managing Growth**

Haringey Heartlands and Tottenham Hale will be the key locations for the largest amount of Haringey's future growth. Northumberland Park (which includes the redevelopment of Tottenham Hotspur) and Seven Sisters Corridor will also provide a substantial number of jobs and new homes as well as other community uses and facilities and estate regeneration.

Haringey will ensure that all development will respect the character of its surroundings and provide environmental and service improvements.

### **Strategic Policy 2 – Housing**

Density and design standards to deliver quality homes. The Council will aim to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet or exceed the current target of 6,800 homes from 2011 – 2026 (680 units per annum). (The Mayor of London has proposed raising this target to 820 units per annum).

In addition, schemes over 10 units will be required to provide 50% affordable housing. Schemes below the ten unit threshold will be required to provide 20% affordable housing on site, based on habitable rooms, or provide financial contributions towards affordable housing provision (this policy has been changed following consultation in May/June 2010 and was subject to a further four week public consultation in November/December 2010).

### **Strategic Policy 3 – Provision of land for Gypsies and Travellers**

The Council will protect existing lawful sites, plots and pitches for Gypsies and Travellers. The redevelopment of such sites will not be permitted unless they are replaced by equivalent or improved sites, plots and/or pitches in suitable locations within Haringey.

### **Strategic Policy 4 – Working Towards a Low Carbon Haringey**

Haringey will work towards reducing energy use in buildings and working towards a low carbon borough will be one of the key challenges facing Haringey. The Council will promote measures to reduce carbon emissions from new and existing buildings

### **Strategic Policy 5 – Water Management and Flooding**

The Council will require all development in Haringey to use less water during construction and operation, and to reduce the potential for general and flash flooding.

## **Strategic Policy 6 – Waste and Recycling**

The Council supports the objectives of sustainable waste management set out by the Government in PPS10 Planning for Sustainable Waste Management and the Mayor's London Plan.

## **Strategic Policy 7 – Transport**

The Council will promote key infrastructure proposals to support Haringey's regeneration and local/strategic access to London, employment areas and local services. It will also deliver action on climate change and quality and healthy places by promoting public transport, walking and cycling, promoting road safety and pedestrian movement and seeking to locate major trip generating developments in locations with good access to public transport and so better integrate transport and land use planning.

## **Strategic Policy 8 – Employment**

The Council will secure a strong economy in Haringey and protect the borough's hierarchy of employment land (this policy has been changed following consultation in May/June 2010 and was subject to a further four week public consultation in November/December 2010).

## **Strategic Policy 9 – Improving Skills and Training to Support Access to Jobs And Community Cohesion and Inclusion.**

The Council will seek to address unemployment by facilitating training opportunities for the local population, increasing the employment offer in the borough and allocating land for employment purposes.

## **Strategic Policy 10 - Town Centres**

### Distribution of retail across Haringey

The Council will promote the distribution of retail growth to meet the required 13,800m<sup>2</sup> gross comparison goods floorspace and an additional 10,194m<sup>2</sup> net convenience goods floorspace by 2016. The majority of this additional retail growth will be met in Wood Green Metropolitan Centre and the five District Town Centres.

### Protecting and enhancing Haringey's Town Centres

The Council will promote and encourage development of retail, office, community, leisure, entertainment facilities, recreation uses, arts and culture activities within its town centres according to the borough's town centre hierarchy.

### **Strategic Policy 11 – Design**

All new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use.

### **Strategic Policy 12 – Conservation**

All new development in Conservation Areas and affecting Historic Assets shall preserve and enhance Haringey's rich and diverse heritage. SP12 has been amended to reflect PPS5.

### **Strategic Policy 13 Open Space and Biodiversity**

New development shall protect and improve Haringey's parks and open spaces. All development shall protect and improve sites of biodiversity and nature conservation. New development shall provide opportunities for Children's Play Space.

### **Strategic Policy 14 Health and Well-Being**

The Council will seek to improve health and well-being in Haringey. The Council will work with NHS Haringey in its goal to reduce health inequalities in areas with poorest health and will also identify appropriate sites for new health infrastructure especially within Haringey's growth areas.

### **Strategic Policy 15 Culture and Leisure**

The Council will safeguard and foster the borough's cultural heritage and promote cultural industries and activities.

### **Strategic Policy 16 Community Facilities**

The Council will work with its partners to ensure that appropriate improvement and enhancements of community facilities and services are provided for Haringey's communities. This will be based on the programming, delivery, monitoring and updating of the Community Infrastructure Plan

### **Strategic Policy 17 Delivering and Monitoring**

The Council will work with Haringey's Local Strategic Partnership and its sub regional and regional partners to deliver the vision, objectives and policies of this Core Strategy.

### Assessment of Potential Impacts on Equality Strands (Protected Characteristics)

**A = adverse impact**    **N = neutral impact**    **P = positive impact**    **?? = More information needed**

Strategic Policy	Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
1  Managing Growth	<b>P</b>	<b>P</b>	<b>P</b>	<b>P</b>	<b>P</b>	<b>P</b>	The policy should benefit all as it aims to increase available homes in Haringey, in accessible locations. A key consideration across all equality strands should be to continuously improve existing consultation with equality groups.
2  Housing	<b>P</b> Suitable mix of housing to meet needs of young people in terms of affordability; location and size. Potential increased demand for sheltered housing and retirement units.	<b>P</b> Lifelong homes strategy – ensuring homes are adaptable to specific disability and impairment needs.	<b>P</b> Address Specific housing requirements related to domestic violence.  Address Specific needs and requirements of single parent families.	<b>P</b> Being able to respond to cultural issues which have an impact on the type of service required and the way in which it should be delivered. i.e. facilities in particular positions; larger sized properties.	<b>??</b> Monitoring of levels of hate crime, anti social behaviour and management transfers related to this equality strand.  Key issue is to gather information regarding this equality strand.	<b>??</b> Monitoring of levels of hate crime, anti social behaviour and management transfers related to this equality strand.  Key issue is to gather information regarding this equality strand.	The policy should benefit all as it aims to increase available of differing types, sizes and tenure of homes in Haringey, aiming for 50% of them to be affordable.  A key issue across all equality strands is to continuously monitor and gather information about the housing needs of all sections of the community in order to ensure that the council is aware of and able to respond to new housing needs.

Strategic Policy	Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
3 Gypsies and travellers	P	P	P	P	P	P	Central Government has set a target to provide accommodation for gypsies and travellers. All authorities are required to make efforts to meet the targets set. The development of a policy and strategy regarding gypsies and travellers will assist the council to work towards meeting this target locally. Haringey is working towards the development of a strategy relating to gypsies and travellers.
4 Working towards a low carbon Haringey	P Security and safety are generally expressed as areas of concern for older and younger people	P	P	P	P	P	The policy aims to protect and enhance Haringey's strategic and local resources.
5 Water management and flooding	A Research has shown that the appreciation of natural assets and the environment	P Improvements to the environment to consider the accessibility issues of those with disabilities /	P Security and community safety issues are specific concerns for women.	P	P	P	The policy aims to improve protection from flooding, reducing CO2 emissions, reducing pollution and supporting sustainable design which should benefit all – however concerns over safety and access may reduce the benefits for some strand groups in

Strategic Policy	Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
	can be a contentious issue between young and older people.	impairments.					particular.
6 Waste and recycling	P	P	P	P	P	P	Improvements to waste and recycling should benefit all – access to more local facilities and increased services for doorstep collections for example. Identification of new waste sites could be seen as locally negative but improved infrastructure would have longer term environmental benefits.
7 Transport	P Need transport facilities and opportunities that enable young people to access local employment, training and education opportunities. Need transport facilities and opportunities	P We will work with public transport providers to address some of the issues that disabled people themselves have identified as important	P	P	P	P	The policy supports economic regeneration with the improvement of safety and security on transport networks, reducing car dependency by promoting public transport, locating major trip generating development with good transport access by integrating transport planning and land use planning.  This is an issue for all equality strands. Key consideration is the specific requirements and needs of the different equality groups.

Strategic Policy		Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
		that enable older people to access health and community facilities.						
8	Employment	<b>P</b>	<b>P</b> Ensure that there are training and support mechanisms in place for people with a disability or impairment, in line with the requirements of the disability Discrimination Act.	<b>P</b> Specific requirements of women and those caring for dependants in order access employment opportunities. Assisting the skills progression of women and those returning to work.	<b>P</b> National and local data suggests that there is a disproportionately high level of unemployment within the BME communities. We will work to address this through economic regeneration	<b>P</b>	<b>P</b>	The policy aims to protect and enhance employment land, whilst promoting complementary current uses with employment use.  A key consideration across all equality strands is to ensure that there are a range of flexible employment opportunities such as flexible working; part time employment; apprenticeships; financial incentives and that this is supported by a infrastructure of good transport facilities; training and childcare opportunities.
9	Improving skills and training		<b>P</b> Ensure that there are training and support mechanisms in place for people	<b>P</b> Specific requirements of women and those caring for dependants in				A key consideration across all equality strands is to ensure that there are a range of flexible employment and training opportunities such as flexible working; part time employment; apprenticeships; financial incentives and that this is supported by a

Strategic Policy	Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
		with a disability or impairment, in line with the requirements of the Disability Discrimination Act.	order access employment opportunities. Assisting the skills progression of women and those returning to work.				infrastructure of good transport facilities; training and childcare opportunities.
10 Town Centres	P	P	P	P	P	P	The policy supports the protection, expansion and intensification of town centres. Good design and management of town centres should be made to the benefit of all – in particular addressing the needs of all equality strand groups. It is an opportunity for improvement.
11 Design	P	P	P	P	P	P	Good design should be made to the benefit of all – in particular addressing the needs of all strand groups. Good design is an <b>opportunity for improvement</b> . Good design should be made to the benefit of all – in particular addressing the needs of all equality strand groups. Good design is an opportunity for improvement.

Strategic Policy	Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
12 Conservation	A	A	A	N	A	N	<p>Planning has a central role to play in conserving our heritage assets and utilising the historic environment in creating sustainable places.</p> <p>The priority to conserve and enhance older buildings can discriminate against groups as physical access may be difficult to alter in older buildings.</p> <p>Additionally, it may be more difficult to change conservation area buildings for alternative uses such as places of worship.</p>
13 Open space and biodiversity	P Older people are afraid to use parks because they do not feel safe there especially on their own	P Like older people, disabled people are also afraid to use parks because they do not feel safe there especially on their own.	P	P	P	P	<p>The policy promotes the safeguarding of existing open space from development and the creation of new open space in deficient areas to promote health and wellbeing.</p> <p>A key objective across all equality strands should be to ensure that individuals from the diversity of backgrounds have similar life opportunities. That there are strong and positive relationships between people of different backgrounds and</p>

Strategic Policy	Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
							<p>circumstances.</p> <p>Assessing the cohesiveness of local communities by different equality groups and monitoring community tensions needs to be part of community wellbeing initiatives. The council receives preventing violent extremism funding and performance information regarding projects and initiatives associated with this should be incorporated into information related to this objective. This will enable the council to identify any tensions / specific community cohesion/ well being issues and take appropriate action to address any issues identified.</p>
<p>14 Health and wellbeing</p>	<p><b>P</b> Increased demand and need for facilities as a result of the increasing size of the older community.</p>	<p><b>P</b></p>	<p><b>P</b></p>	<p><b>P</b> Specific cultural needs related to ethnicity.  Disproportionate health outcomes for some BME groups.</p>	<p><b>P</b></p>	<p><b>P</b></p>	<p>The policy promotes healthy communities by a good standard of housing with well designed streetscapes. Encouraging healthy activity, traffic calming, promoting fresh food, providing jobs and educational opportunity, lessening environmental impacts and reducing inequalities.</p>

Strategic Policy	Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
15  Culture and Leisure	P	P	P	P	P	P	<p>Affordability of cultural and leisure facilities are pertinent issues common to all equality groups.</p> <p>The policy promotes the safeguarding and promotion of the boroughs cultural heritage, promoting cultural industries and activities, and promoting and enhancing sporting facilities.</p>
16  Community infrastructure	<p>P</p> <p>The lack of facilities for young people has been a well highlighted issue, not least by young people themselves. Providing suitable community facilities will be part of the solution.</p>	P	P	<p>P</p> <p>Facilities for individuals and groups to practice faith and associated activities.</p> <p>Facilities and opportunities for cultural enrichment and sharing to build cohesive communities.</p> <p>Particularly for newer</p>	P	P	<p>Affordability of community facilities and safety are pertinent issues common to all equality groups.</p>

Strategic Policy	Age	Disability	Gender	Ethnicity	Religion or belief	Sexual orientation	Commentary
				communities from eastern Europe there is a distinct lack of facilities for them to organise and fully participate in the life of the borough. -			
17 Delivering and Monitoring the Core Strategy	P	P	P	P	P	P	The delivery and monitoring proposed for the Core strategy will also provide information on monitoring the effects (positive and negative) on the 6 equality strands wherever possible. This process should enable Haringey to identify where policy and/or implementation could be improved or where there examples of good practice.

## 6. Recommendations and Comments

---

### 6.1 Core Strategy

- The Core Strategy is relevant to strategic policies and therefore, it is also relevant to the general duties of the Equality Act 2010.
- It was highlighted by the EqIA Scoping report in 2007 that the projection for the size of the ethnic minority community in Haringey is that it will increase. It is currently nearly 50%
- Although this EqIA has looked at the different equality groups and identified particular factors to take into account for the development of the Core Strategy, further data may be required to identify all the potential adverse/negative/positive impacts. It is suggested that the gaps identified can be further addressed by additional engagement with different stakeholders to gain their perspective and factor these in the strategy as appropriate; in particular representing disability and Lesbian, Gay, Bisexual and Transexual equality strands.
- There is little monitoring of customer use of planning and so there is no current data on this. It is recommended that this be taken forward with the appropriate Haringey management systems.

### 6.2 Consultation

- The information gathered is being used to assess whether there is, or is likely to be, a differential impact, whether direct or indirect, upon the relevant group (or groups). There is also the potential to assess unmet needs (gaps in service provision) and planning related requirements of any of the target groups;
- If an adverse effect on any of those groups can be identified, department heads will need to assess whether the policy is unlawfully discriminatory, taking into account that some policies are intended to increase equality of opportunity by requiring or permitting positive action, or action to redress disadvantages. They will then have to decide how to ensure that the Council acts lawfully;
- Even if the policy/strategy is not unlawful, the department concerned will need to consider what actions are possible within legislative boundaries in light of any adverse impact identified;
- People invited to participate in any consultation exercise will have needs regarding information i.e. notification, attendance; expectations of role, and benefit to them, their organisation and or the Council of contributing to the consultation process;

### 6.3 Comments

- The limited availability of immediately accessible qualitative and quantitative data for all of the equality strands may mean additional research for relevant data before a full EqIA can be concluded;
- Haringey has taken positive steps in producing equalities guidelines and equal opportunity policy. There is now highly professional, strong support for the writing in-house of equality impact assessment;
- Although this EqIA has looked at the different equality groups and identified particular factors to take into account for the development of the Core Strategy, further data may be required to identify all the potential adverse/negative/positive impacts. It is suggested that the gaps identified can be further addressed by additional engagement with different stakeholders to gain their perspective and factor these in the strategy as appropriate; in particular representing disability and Lesbian, Gay, Bisexual and Transexual equality strands;
- There was little monitoring of customer use of planning and so no current data are available on this. It was therefore recommended that this be taken forward with the appropriate Haringey management systems. Formerly, an annual customer survey was sent out. This has been replaced with a customer satisfaction survey, sent out to each applicant of a planning application after a decision has been made. This survey includes an equalities monitoring form. The results of this will be used wherever possible to monitor the equality implications of implementing planning policy.

## Equality Improvement Plan

Actions	Officer responsible	Timescales
Regular review of policy related evidence base	Planning policy team	<b>Ongoing</b>
Relevant staff to attend Equality and Diversity Equalities Impact Assessment training	Planning policy team	<b>Ongoing</b>
Ensure relevant equality and diversity indicators are included in the Annual Monitoring Report	Planning policy team	<b>Ongoing</b>
Ensure consultation promotes the involvement and participation of hard to reach groups (as outlined in the Statement of Community Involvement)	Planning policy team	<b>Ongoing</b>
Review of customer satisfaction survey equalities monitoring forms	Business support Planning policy team	<b>Ongoing</b>
Review of EqIA progress with Corporate Equalities Team	Planning policy team Equalities team	<b>Ongoing</b>

---

## Appendix 1 – Legislation

---

Civil Partnership Act 2004.

Disability Discrimination Act 1995

Disability Discrimination Act 2005

Equal Pay Act 1970

Employment Act 2002

Employment Equality (age) Regulations 2003

Employment Equality (religion or belief) Regulations 2003

Employment Equality (sexual orientation) Regulations 2003

The Equality Act 2006

Gender Equality Duty 2007

Human Rights Act 1998

Race Relations Act 1976

Race Relations (Amendment) Act 2000

## **Appendix 2 - Additional References**

---

### **Mayor of London**

London Plan, 2008

Draft Replacement London Plan, 2009

Children's and Young Persons Strategy, GLA, 2004.

Domestic Violence Strategy, GLA, 2005

Draft Health Inequalities, GLA, 2008

London Enriched (draft Refugee Integration Strategy), GLA, 2007

Older Peoples Strategy, GLA, 2006

Rough Sleepers Strategy, GLA, 2001

### **Haringey**

Age Equalities Review, Haringey, 2002.

Disability Equality Access Guide, Haringey, 2007.

Disability Equality Review, Haringey, 2000.

Equal Opportunities Guide for Business Planning, Haringey, 2004.

Equal Opportunities Policy, Haringey, 2008.

Equalities Impact Assessments, Haringey, 2006.

Equalities Matters Newsletter, Haringey, (quarterly).

Equalities Scheme, Haringey, 2006.

Race Equality Review, Haringey, 1999.

Ready to Explode ~ Children & Young People, Haringey.

Review of Translation and Interpreting Service, Haringey, 2000.

Sexuality Review, Haringey, 2004.

Women Equality Review, Haringey, 2001.

Women's Directory 3rd Edition, Haringey, 2004.

## Appendix 3 – Consultation questions

---

The following questions have been used in guiding consultation:

- *What individuals are or are likely to be directly affected by the strategy/objective?*
- *What relevant groups have a legitimate interest in this strategy?*
- *How do we ensure that those affected by or with a legitimate interest in the policy are consulted?*
- *How will information be made available to those consulted?*
- *Will the information be accessible to minority groups such as those with disabilities and ethnic minorities?*
- *What barriers exist to effective consultation with each of the groups / bodies / persons identified above?*
- *What measures can be taken to facilitate effective consultation in light of any barriers – have you booked an accessible venue, is it scheduled to start at a time that is convenient ?*
- *Have previous attempts at consultation with particular groups been unsuccessful? If so, why, and what can be done to overcome any obstacles?*
- *Are resources available to encourage full/wider participation?*

Consultation takes different forms, for example children, elderly people, Gypsies and Travellers, people with disabilities and persons with dependants cannot all be consulted in the same way, different approaches may be necessary. It is important to seek the advice of representative groups and relevant agencies to ensure that the most affected individuals and groups are helped to engage in the process.

Steps to minimise the impact of consultations have been taken with other departments to coordinate activities including press advertising, use of ongoing dialogue, purposefully focusing consultations on a number of affected groups.

Amongst the various consultative mechanisms, face-to-face, expert or general meetings are used. In planning meetings, organisers are giving consideration to an array of practical issues, including the following:

- *Is the venue wheelchair accessible?*
- *Are there loop/signing/other facilities for people with varying disabilities?*

- *Are the acoustics generally good?*
- *Is it clear that people can bring and use advocates?*
- *In complex buildings, is there a meeting and guiding service for those requiring it?*
- *Have arrangements been made and individuals trained to deal with emergency evacuations?*
- *Is the meeting in an area which will result in people of one community feeling uncomfortable about attending?*
- *Has access to and from the meeting also been considered?*
- *Will the target audience feel comfortable? For example, does the venue have a reputation for being 'gay unfriendly'?*
- *Will the arrangements for chairing and organising reflect this hospitality? For example, young people may come to a school to discuss youth problems but they may not find it easy to talk freely if teachers are running the session.*
- *Are the venues flexible enough to allow larger/smaller group discussions?*
- *Are the venues accessible to public transport, and if not can alternative transport arrangements be made? For example, for people with mobility impairments or for people with dependants and/or on low income.*
- *Depending on the issue under discussion, are the venues geographically spread, or are they overly concentrated in urban centres?*
- *Are crèche facilities available?*
- *Are interpreters needed?*

Written documents are made available to participants that as far as possible:

- Use plain English and be jargon-free;
- Convey specialist information in as simple a format as possible. For example, there will be occasions when documents need to include detailed statistics or specialised information. Such material should be translated into a format which enables non-experts to engage with the process;
- Include an executive summary;
- Offer the text in languages other than English and in disability-friendly formats (for example, Braille, audio-tape, large type, etc.);
- Be relayed in newspapers, magazines and other material that is likely to be read by participants. This would include minority language publications and magazines published by the voluntary sector;

- Depending on the targeted audience, the documentation could be accompanied by alternative formats other than print (for example, videos, role-play formats) and advice on possible discussion formats;
- Where appropriate, include specific questions or issues for discussion with particular target audiences. For example, people who have certain disabilities may not find written communication effective; and
- Personal/individual communication may be needed and should not be seen as something extraordinary, when trying to include people who otherwise could not take part.