

Havering Cabinet Meeting on August 5 2020

**Item to be approved for Havering Local Plan
Main Modifications Public Consultation**

**Equalities Impact Assessment for the amended Statement
of Community Involvement**

August 2020



Examination into the Havering Local Plan 2016 – 2031

**Document published for information* alongside the
Proposed Main Modifications**

**Equalities Impact Assessment for the amended
Statement of Community Involvement**

August 2020

*** this document is published for information and is not part of the suite of documents on which comments can be submitted**

Equalities Impact Assessment for the London Borough of Havering's Statement of Community Involvement 2020 update

August 2020

1. Introduction

1.1 This document is the Equality Impact Assessment (EqIA) for the London Borough of Havering's Statement of Community Involvement (SCI) 2020 update. The purpose of this EqIA is to ensure that all residents have equal access to public consultations. It identifies the likely impact of the temporary changes made to the SCI on the ability of the borough's diverse community to be involved in consultation. The EqIA can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group. This EqIA relates to the temporary changes to the SCI and is not an EqIA of the complete SCI from 2015.

1.2 The duty to carry out an EqIA of new policy is set out in the Equality Act 2010. The Act protects people from discrimination on the basis of certain characteristics, which are known as protected characteristics. The protected characteristics are:

- **Age** – a person of a particular age group
- **Disability** – a person who has a physical or mental impairment
- **Race** – includes colour, nationality, ethnic or national origins
- **Sex** – being a man or a woman
- **Gender reassignment** - a person who is proposing to undergo, is undergoing or has undergone a process (or part of a process) of reassigning the person's sex by changing physiological or other attributes of sex.
- **Marriage and Civil Partnership** – a person who is married, isn't married, or in a civil partnership
- **Pregnancy and maternity** – includes discrimination towards women who are pregnant, given birth, or breastfeeding
- **Religion or beliefs** – includes religion, lack of religion or philosophical beliefs
- **Sexual orientation** – a person's sexual orientation towards a person of the same sex, of the opposite sex or persons of either sex

1.3 The Duty requires public bodies to have due regard for the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities.

2. The Statement of Community Involvement

2.1 The purpose of the Statement of Community Involvement (SCI) is to set out the preferred options and legal requirements for involving the community and other stakeholders in, 1) The preparation of planning policies including a new Havering Local Plan which will set out the long term strategic planning priorities, objectives and opportunities for development and clear policies on what will or will not be permitted and where, and 2) The determination of planning applications through the decision making process.

2.2 Havering's last SCI was adopted in 2015. However, due to the circumstance arising from the covid-19 pandemic, national planning guidance has updated regulations and recommendations to respond accordingly to the restrictions we find ourselves facing. Updates to the National Planning Policy Guidance (NPPG) encourage local planning authorities to undertake an immediate review of their SCIs and update the policies where necessary so that plan-making can continue during this time (NPPG Paragraph: 077 and 078). Because of this, Havering has made some changes to the 2015 SCI to ensure that consultation of the main modifications of the Local Plan can move forward.

2.3 Havering's Local Plan is currently being prepared to go out to consultation on the Main Modifications identified by the inspector. The updated SCI is needed so that the Council can effectively provide meaningful opportunities to the community to engage in the plan making process during these challenging and unprecedented times. It is also essential to continue consultation as government sees Local Plans as a key 'tool' in securing economic recovery.

3. Legislation and council strategies

3.1 The Equalities Act 2010 replaces previous anti-discrimination law with a single Act, making the law easier to understand and strengthening protection in some situations. It legally protects people from discrimination in the workplace and in wider society. The public sector Equality Duty 2011 requires that public bodies (like Havering Council) have to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees.

3.2 “One Havering” Community Cohesion Strategy 2018-2022 is Havering’s first community cohesion strategy. It lays out the changes and challenges the borough is facing and how the council can use these challenges as an opportunity to promote inclusive place-shaping, including supporting newer and older communities to live well and interact with each other. The main objective of the strategy is;

‘To nurture and promote a cohesive, healthy and optimistic Borough underpinned by mainstreamed inclusive British values, where everyone experiences dignity and equal life chances, and where neighbours, colleagues and different community groups interact, respect and value each other’.*

* Regardless of age, colour, class, disability, education, ethnicity/race, sex, health status, marital status, nationality, political perspective, religion, transgender identity, sexuality, or socio-economic status.’

4. Table 1 shows the EqIA screening process. It lays out the current data we know about the protected groups in Havering, how the group may be effected by the updated SCI, and what actions will be taken to mitigate further potential negative impacts.

Table 1. EqlA Screening

Protected Characteristic	What we know as a council about this group	Impact of the SCI on this group (+/-)	Explanation	Actions to be taken to mitigate potential negative impacts
Age	<p>The total population of Havering is 259,552. Havering has the oldest population in London with a median age of 39. 18% of residents are aged 65 or older, which is much higher than the London average of 12%. 13,499 people in Havering over the age of 65 live alone.</p> <p>From 2012 to 2017, Havering experienced the largest net inflow of children across all London boroughs. 4,343 children settled in the borough from another part of the United Kingdom during this six year period. The current percentage of children, age 0-15, is very similar to the London average (20.3% in Havering, 20.6% in London).</p> <p>It is projected that the largest increases in population will occur in children (0-17 years) and older people age groups (65 years and above) up to 2033.</p>	+	<p>Older people tend to prefer reading hard copies of documents due to lack of skills or access to computers. Usually, this is offset by having hard copies available in libraries and at the town hall. The covid-19 changes to the SCI means that hard copies won't be available in libraries, the Romford public advice service centre, or in the town hall. However, hard copies will still be available on request, so if someone feels that the other methods the Council uses are not appropriate for their needs, they still have that option.</p> <p>The Council will be able to make use of letters to draw attention to consultations that are going on, as well as keeping the method of notifying through the Romford Recorder and the Living in Havering Magazine. Social media will also be made use of, which many older persons have become more accustomed to during this time of lockdown.</p> <p>Young persons are usually less engaged with consultations in general. However, increased use of social media during consultation due to the lockdown precautions has the potential to increase younger participation due to higher social media use of the younger population.</p>	<p>As mentioned in the updated NPPG, on-line engagement methods should be used "to their full potential". Havering will make use of these methods.</p> <p>Letters and emails to people signed up to the Havering consultation database will still be distributed, as set out in the SCI</p> <p>The consultation period will also be extended to 8 weeks instead of the statutory 6 weeks to ensure people are given more time to respond. This will allow people to come to grips with new methods the council will use for the consultation, get any queries answered, and ensure reasonable timeframe for hard copy delivery.</p>

Disability	<p>About 19% of working age people living in Havering disclosed that they have a disability or long term illness. This is similar to the London average of 20%.</p> <p><u>Visual impairment</u> 449 per 100,000 people are registered blind in havering. This is very close to the London average (446 per 100,000). Older people are more at risk from total or partial sight loss.</p> <p><u>Learning disability</u> Around 970 adults in havering have a moderate or severe learning disability. 1,900 additional people have autistic spectrum disordered.</p>	+	<p>Increased use of online methods of communication will benefit those with physical disabilities who may have previously found it hard to attend in-person consultation events. Examination meetings and similar will now be held on online platform, making it easier for those to access from the comfort of their homes.</p> <p>Those with visual impairment may need extra support in accessing online events.</p>	<p>The Council has alternative forms of documents available on request, which could be utilised by those with disabilities. This should be advertised on social media to ensure this knowledge is known.</p> <p>The consultation period will also be extended to 8 weeks instead of the statutory 6 week to ensure people are given more time to respond. This will allow people to come to grips with new methods the council will use for the consultation and get any queries answered.</p>
Ethnicity/Race	<p>Havering is one of the most ethnically homogenous places in London, with 83% (census 2011) of its residents recorded as White British, higher than both the London average (45%) and England average (80%).</p> <p>Romany Gypsies and Irish travellers are identified as a racial group under the Equalities Act 2010. In the 2011 census, Havering had 160 people identifying as white Gypsy or Irish Traveller. The Gypsy and Traveller Accommodation Assessment (GTAA) report (July 2019) identifies future</p>	+	<p>Havering's consultation database includes contacts for ethnic minority community hubs. These contacts will all be made aware of the consultation, as laid out in the SCI.</p> <p>Extensive work has been done to create a relationship with Gypsies and travellers to engage them in consultations. Opinion Research Services (ORS), who have carried out previous consultation with the Gypsy and Traveller community, will again be involved in the process, making the community aware of</p>	<p>New contacts can be added to Havering's consultation database at any time.</p> <p>A variety of consultation methods will hopefully improve the likelihood of engagement in different ethnic groups.</p> <p>Alternative versions of the document can be utilised, e.g.</p>

	need as 220 pitches for Gypsies and Travellers and 5 plots for Travelling Showpeople for the Plan period 2016-2031.		consultation methods and the changes to the Local Plan that effects them.	translations or easy-to-read versions.
Gender/Sex	Males make up 48.1% of the population, while females are 51.9%. The life expectancy at age 65 years in Havering is 18.5 years for males and 21.6 years for females.	Neutral	N/A	Continue to provide an inclusive and open to all approach to public engagement.
Gender Reassignment	There is currently no data on gender reassignment in the borough. There is no robust data on the UK trans population, however the government equalities office (2018) estimates that there is 200,000-500,000 trans people in the UK.	Neutral	Due to lack of data, how the updated SCI could effect this group can't be assessed.	Continue to provide an inclusive and open to all approach to public engagement.
Marriage and civil partnership	48.5% of Havering residents are married, which is higher than the London average (39.8%) and England average (46.6%). 0.1% of havering residents are in a same sex civil partnership.	Neutral	N/A	Continue to provide an inclusive and open to all approach to public engagement.
Pregnancy and Maternity	There has been an increase in the general fertility rate from 58 (per 1,000 women aged 15-44) in 2004 to 68 in 2017. This equates to an additional 10 births per 1,000 women aged 15-44 within the period.	+	Online tools will be utilised to their fullest, providing easy access to public consultations. This can benefit expecting or new mothers, who many have limitations due to their physical state and/or parental responsibilities. Examination meetings and similar will now be held on online platform, making it easier for people to access from the comfort of their homes.	Consider timings of any online meetings to take into account parental responsibilities. Provide access to recordings of meetings if people can't attend on the day.

Religion or Beliefs	<p>65.6% of Havering residents are Christian. This is much higher than the London average (48.4%) and the England average (59.4%). Hindu is the second highest religion in Havering (1.2%).</p> <p>22.6% of Havering residents have no religion.</p>	+	Havering's consultation database includes contact information of various religious community groups in Havering. These will all be contacted about the consultation, as laid out in the SCI.	New contacts can be added to Havering's consultation database at any time.
Sexual Orientation	<p>There is currently no data on sexual orientation in the borough. According to the ONS (2018) 2.2% of the UK population identified as lesbian, gay or bisexual (LGB). People in London were most likely to identify as LGB (2.8%), with people in the North East the least likely (1.8%). We can use these statistics to make some assumptions about levels of LGB people living in Havering.</p>	Neutral	Due to lack of data, how the updated SCI could effect this group can't be assessed.	Continue to provide an inclusive and open to all approach to public engagement.