

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)	Harrow and Wealdstone Area Action Plan: Pre Submission Document
Which Directorate and Service is responsible for the policy?	Place Shaping – Planning Services – LDF Team
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?	<p>The Area Action Plan (AAP) is a new policy document. It is currently at the third and final stage of the plan making process following an initial Issues and Options Consultation and a Preferred Option consultation, but once adopted, the policies of the AAP will replace those within the existing Harrow Unitary Development Plan (2004). Preparation of the AAP is being undertaken by the Council in accordance with the Town and Country Planning Regulations 2008.</p>
2. What are the aims, objectives or purpose of the policy?	<p>Overall, the aim of preparing the Area Action Plan is to have a single, statutory plan, that provides clarity and certainty to landowners, developers, service providers and the community about how places and sites within the Intensification Area will develop, and against which investment decisions can be made and development proposals can be assessed.</p> <p>The objectives for the Area Action Plan are to:</p> <ul style="list-style-type: none"> ▪ Provide landowners, residents, developers and decision makers with greater certainty as to the distribution, scale, form and function development is to take within the Intensification Area; ▪ Allocate strategic sites and provide an indication of the type and optimum levels of development to be achieved; ▪ Provide general, as well as site specific, criteria and design guidance to deliver the agreed form of

	<p>development;</p> <ul style="list-style-type: none"> ▪ Promote Town Centre renewal and, in particular, to clearly define the role and function of Wealdstone and Harrow town centres; ▪ Secure high quality development of both built form and open spaces; ▪ Ensure development and growth on individual sites, as well as across the whole of the Intensification Area, embodies best practice in environmental sustainability; ▪ Provide standards for infrastructure provision including renewable energy, open space, car and cycle parking, and surface water drainage; ▪ Identify and secure the infrastructure needs of development, including green infrastructure; ▪ Provide an appropriate level of community services and facilities required to attract development and to serve the community satisfactorily; ▪ Provide safe and convenient access for all to public buildings and spaces, and to public transport, including those with limited mobility; and ▪ Determine the appropriate phasing of development taking into account the need to ensure regeneration occurs across the whole of the Intensification Area, including on sites with greater constraints than others.
<p>3. What factors / forces could prevent you from achieving these aims and objectives?</p>	<p>The AAP outlines a strategy for how the aims of the Intensification Area should be met. The purpose of the consultation is to seek views on 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. Factors that could influence the adoption and implementation of the AAP itself include a change in Government regulations regarding the plan-making process or a change in economic circumstances affecting public and private investment.</p>
<p>4. How does the policy contribute to the council's corporate aims and objectives?</p>	<p>The AAP will help to deliver the following corporate priorities:</p> <ul style="list-style-type: none"> • Keeping neighbourhoods clean, green and safe: by promoting a better quality built environment and public spaces, and considering options for enhancing green infrastructure and access to open spaces. • United and involved communities - a Council that listens and leads: Engagement with the community and others is at the heart of the LDF process. The Area Action Plan responds to the community's concerns about the state of Harrow town centre and seeks to ensure that the development and growth within the Intensification Area reflects the priorities and preferences of residents. • Supporting our Town centre, and local shopping centres and businesses: The AAP will provide

	a positive and clear policy framework to guide the future development and growth within Harrow Town Centre and Wealdstone District Centre, as well as securing appropriate investment in infrastructure and required environmental improvements.
5. Who is intended to benefit from this policy and in what way?	The AAP is intended to provide landowners, residents, developers and decision makers with greater certainty as to the distribution, scale, form and function development is to take within the Intensification Area over the next fifteen years. Such clarity is necessary to promote investment in Harrow in providing new housing, retail, leisure and other employment development, and to drive regeneration initiatives to improve the overall quality of the Intensification Area, including the provision of new or enhanced social and physical infrastructure. New housing and jobs, improved leisure, retail and entertainment facilities, alongside new social and physical infrastructure will benefit those who live and work in the Intensification Area. However, given its central location within the borough, and its accessibility, such improvements are also likely to be of benefit to the whole of Harrow.
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, in conjunction with key delivery partners including the GLA, HCA and the development community. The AAP will be 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 Harrow's resources.
Stage 2: Collecting Evidence	
7. What data or benchmarking information is available to facilitate the screening of this policy? <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>The AAP must be based upon a robust and up-to-date evidence base. A Baseline Report has been prepared by consultants, which contains detailed information / data and analysis about planning policy context, history and heritage, urban form, character areas, existing residential stock, movement and transport, use patterns, demand - supply requirement for jobs and housing and strength and weakness of the IA. The borough level evidence base studies are published on the Council's website 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.</p> <p>To further support the development of the spatial development strategy options are 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 the preferred option to determine whether any adverse effects can be avoided, remedied or mitigated and any positive impacts maximised. These findings of the SA are published alongside the AAP, so that people are able to make informed decisions about the likely</p>

impacts of the AAP. The publication of the SA enables people to also comment on the findings of that process and to query these.

8. Have you undertaken any consultation on this policy?

Yes. The Issues and Options stage which was the first stage in the Area Action Plan's production was published for public consultation in May for a period of six weeks and a further six week consultation in January / February 2012 was undertaken to invite public and stakeholder views and comments on the preferred development strategy being proposed, and to enable consultees to offer up further information of relevance to the development of the Plan. This is the final consultation version as to the documents soundness and legal compliance.

If yes, who was consulted? (this may include staff, members, unions, community / voluntary groups, stakeholders, residents and service users)

The previous consultations, alongside this one will be undertaken in accordance with the Council's adopted Statement of Community Involvement. In addition to Statutory Bodies, the Council will notify over 1,200 people and businesses on our LDF consultation database, will place notices about the consultation in the local newspaper, and will also seek to engage existing forums of hard to reach groups.

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		X

The vision and objectives are quite broad and wide ranging. The AAP has no significant negative impacts on any equalities group, however a number of positive impacts have been identified on all groups, especially Age group - children and elderly; Disability group and Low income group. Further details are provided in 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 to ensure that positive outcomes are achieved regarding social, environmental, and economic objectives, which benefit many equalities groups. Further details are provided in section 14.

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		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)														
Spatial Strategy and Impact Group		Commentary												
Equalities Assessment of the spatial development strategy. All Groups		The strategy out for public consultation, seeks to meet the agreed strategic objectives for the Intensification Area. This is to seek to provide a minimum of 2,800 new homes and at least 3,000 new jobs, to renew and strengthen Harrow town centre, and to regenerate Wealdstone. Given the size of the Intensification Area, the chosen distribution is not considered to give rise to any disparities or inequalities in respect of access to newly created employment, housing, facilities or services. It is difficult to determine what if any potential impacts for any particular group(s) might arise as a result of built form, as these are potentially overshadowed by positive impacts being derived by net gain across the Intensification Area, as well as by the inclusion of policies and standards that will ensure new development is inclusive, accessible, and provides choice and diversity in terms of unit sizes, tenure and affordability.												
Equalities Appraisal Of AAP Policies, Designations and Site Allocations														
Policy		Score (+ or -)					Comment							
AAP Policy 1 – Development within Harrow town centre		+					Improved public realm and new development that must incorporate modern inclusive design standards will benefit all, especially disability groups.							
AAP Policy 2 – Station Road		+					Improved public realm, especially along Station Road and new development that must incorporate modern inclusive design standards will benefit all, especially disability groups.							
AAP Policy 3 – Wealdstone		+					Improved public realm and new development that must incorporate modern inclusive design standards will benefit all, especially disability groups.							
AAP Policy 4 – Achieving a High Standard of Development throughout the Intensification Area		+					All groups, overall improvement to the built environment and increased inclusiveness through implementing good design standards will benefit all.							
AAP Policy 5 – Density and Use of Development		None												

AAP Policy 6 – Development Height	None	
AAP Policy 7 – Creating a New Public Realm	+	Improved public realm will benefit all, especially disability groups.
AAP Policy 8 – Enhancing the Setting of Harrow Hill	None	
AAP Policy 9 – Flood Risk and Sustainable Drainage within the Intensification Area	+	By ensuring development is resistant and resilient to flooding, all groups will benefit from safe building design, especially the less mobile.
AAP Policy 10 – Harrow and Wealdstone District Energy Network	None	
AAP Policy 11 – Provision of Open Space within the Intensification Area	+	All groups will benefit from both qualitative and quantitative improvements to open space.
AAP Policy 12 – Improving Access to Nature within the Intensification Area	None	
AAP Policy 13 – Housing within the Intensification Area	+	This policy will benefit all, although notably the disability group, and socio economic group, through providing affordable housing, improved accessibility to new homes through design standards, and increased housing choice. It should be noted that the provision of affordable housing can be seen to be favouring one particular Equalities group – Socio Economic, but this is to improve equality overall.
AAP Policy 14 – The Consolidation of the Wealdstone Strategic Industrial Location	+	The Socio Economic group will primarily benefit–through ensuring a range of suitable employment opportunities are available in the local area.
AAP Policy 15 – Supporting the Business Sector in Wealdstone	+	All groups will benefit, although notably the Socio Economic group – through ensuring a range of employment opportunities are available in the local area.
AAP Policy 16 – Supporting the Service Sector in Harrow town centre	+	All groups will benefit, although notably the Socio Economic group – through ensuring a range of employment opportunities are available in the local area.
AAP Policy 17 – Harrow Primary	+	All groups to benefit from the retention of a primary

Shopping Area and Primary Frontages		core of retail provision in the main town centre to serve the Borough's shopping needs
AAP Policy 18 – Secondary Frontages, Neighbourhood Parades and Non Designated Frontages	+	All groups to benefit from the retention of a primary core of retail provision in appropriate locations to serve local shopping needs
AAP Policy 19 – Parking and Access within the Intensification Area	+	Disabled groups will benefit by ensuring new development has adequate provision for disabled parking
AAP Policy 20 – Harrow and Wealdstone Green Travel Plan	None	
AAP Policy 21 – Harrow Waste Management Site	None	
AAP Policy 22 – Supporting Site Assembly within the Intensification Area	None	
Designations – 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.
Designations – 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.
Designations – 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
Designations – New Business Use Area and Changes to SIL Designation	None	
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. By locating retail uses in the Intensification Area – the most accessible area of the Borough by public transport will also benefit all groups, especially the Socio Economic group, who may struggle to afford a car in London.
Allocating Sites for Open Space and 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. There is also a positive effect on all groups, especially disabled groups through improving access to open space and recreational areas.
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

Allocating Sites for Employment Use	+		Positive effect on all groups by ensuring employment opportunities are retained and grown in the Borough, to provide jobs for residents, mitigating the need to travel longer distances for work. By locating employment uses in the Intensification Area – the most accessible area of the Borough by public transport will also benefit all groups, especially the Socio Economic group, who may struggle to afford a car in London..			
<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>	The policies in the AAP promote equality of opportunity through encouraging growth and development in the areas of good public transport accessibility, improved community facilities accessible to all and access to new jobs and educational facilities. As above, these opportunities will benefit all, including the existing community, and will therefore help improve social inequality.					
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 any group(s), is that impact unlawful?	Yes			If legal, is the impact intended?	Yes	
	No		If illegal, take legal advice		No	
17. Have you received any	Formal public consultation will be undertaken in July 2012 for a period of 6 weeks, this is the final					

complaints or compliments about the policy? If so, provide details.	consultation that will take place on this document.
18. What monitoring is in place to check the effects of the policy on equality groups?	When adopted, there will be 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 (Authorities) 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>
	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.

This EQIA has examined whether the AAP DPD and associated consultation will/have adverse impacts or discriminate against different groups in the community. The assessment has revealed that the strategy being promoted for the Intensification Area will result in beneficial impacts for most equality groups within the Intensification Area. Such findings are not considered unusual given the AAP is aimed at increasing local provision in housing, employment, and social and physical infrastructure to serve both the new and existing communities.

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 (Authorities) 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 AAP. Positive effects are 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:

21 June 2012

Date:

21 June 2012