

Equality Impact Assessment Template (EqIA)

An Equalities Impact Assessment (EqIA) is a tool to understand the effects a decision will or is likely to have on people, specifically those people who have one or more protected characteristics under the Equality Act 2010.

It is an evidence-based approach and aims to ensure that decision-making processes are fair and do not present barriers to participation or create disadvantage for protected groups.

The EqIA should be started early on in a project before any decision is made. It can also be used:

- As a service improvement tool, and
- To assess the implications of strategic and operational decisions.

In this way, we can help ensure we do not discriminate, and promote equality.

What is the Public Sector Equality Duty (PSED)?

The PSED under the [Equality Act 2010](#) requires that in the exercise of its functions, Waltham Forest Council must have due regard whilst seeking and evidencing ways that we:

- eliminate unlawful discrimination – including victimisation or harassment
- advance equality of opportunity between people who share a protected characteristic and those who don't
- foster or encourage good relations between people who share a protected characteristic and those who don't

The PSED helps the council meet its legal duties and to become more accountable, inclusive, credible and community orientated.

Protected characteristics under the Equality Act 2010

It is against the law to discriminate against someone because of a protected characteristic. These are:

- Age
- Sex
- Ethnicity and race
- Religion or belief
- Disability
- Sexual orientation
- Pregnancy and maternity
- Gender reassignment
- Marriage and civil partnership

An EqIA enables officers to assess the impact of proposed decisions on people with these characteristics.

Protected characteristics as determined by Waltham Forest Council

In addition to our statutory obligations under the Equality Act 2010, Waltham Forest Council include care leavers as having a protected characteristic and to this extent passed a motion in April 2023 to recognise this action. Therefore, Waltham Forest Council's EqIA process also includes a requirement to explore the impact of a proposal on that group.

Additional groups that face structural inequalities

As a Council, we are committed to tackling structural disadvantages faced by our residents. We encourage staff to think about how a decision, proposal or policy might affect wider groups who are not covered by the Equality Act, but still experience relative material or social disadvantage in accessing opportunity.

The [State of the Borough report](#) identifies a number of additional groups that should be taken into account:

- Those who face socio-economic inequality (e.g. unemployment, low income, low academic qualifications) or live in areas of high deprivation
- Care leavers
- People with caring responsibilities
- Survivors of domestic violence
- Migrants, including refugees and asylum seekers
- Homeless people and people at risk of homelessness
- People who are experiencing long-term unemployment

There might be other disadvantaged groups that you know from your service data who might be adversely affected by your proposal or policy. You need to consider these groups as well as the protected characteristics above as part of your EqIA.

Carrying out an EqIA

When doing an assessment, you must answer these questions:

- Is the proposal or policy likely to exclude or have a detrimental effect on a specific group or community?
- Does it affect some groups or communities differently and can this be justified?
- How might it affect wider determinants such as income, housing, education, employment, neighborhoods and communities that impact on health and well-being?
- Is the proposal or policy likely to be equally accessed by all groups and communities? If not, can this be justified?
- Are there any barriers that might make it hard or stop different groups or communities accessing the proposal or policy to be delivered?
- Could the proposal or policy promote equality and good relations between different groups?

Service areas are responsible for ensuring EqIAs are started early on and should consult widely within their service to ensure they have considered all potential impacts. This should also include considering the impact on people who have identities that overlap e.g., intersectionality of gender, race, and disability for instance.

When completing a EqIA use data to help collate demographic evidence including:

- Census 2021 in Waltham Forest
- Statistics about the borough

Other service specific data insights and sources, including data requests via Hornbill.

Guidance on compliance with the Public Sector Equality Duty for officers and decision makers

1. The duty is mandatory and must be met by the decision-maker and not delegated. It is for the decision-maker to consider with help from the report and officer analysis.
2. EqIAs must be evidence-based and accurate – negative impacts must be fully and frankly identified so the decision-maker can fully consider their impact.
3. There must be compliance with the duty when decisions, proposal or policies are being formulated by officers and then by members or officers when taking the decision. The Council cannot rely on an EqIAs produced after the decision is made but sometimes a “provisional” EqIA is appropriate eg. before consultation on a decision, proposal, or policy.
4. When an equality implication is identified, officers and members must give conscious and open-minded consideration to the equality duty when making a decision.

5. The duty is not, however, to achieve the three equality aims but to pay due regard when making the final decision – therefore, the duty can encourage officers to amend or change a decision, proposal, or policy where an equality implication is identified, but it does not stop difficult but justifiable decisions being made e.g to no longer continue a service for instance.
6. The decision maker may take into account things that may objectively justify taking a decision which has negative impact on equalities, e.g. financial targets, value for money or service needs.
7. The duty is ongoing: EqIAs should be reviewed over time and should say how impact will be monitored after the decision.

Positive action

The Equality Act allows 'positive action' to tackle disadvantage faced by those sharing a protected characteristic, even if it has the consequence of disadvantaging those sharing a different protected characteristic. Positive action can be justified where it is proportionate. Positive action is different from positive discrimination, which is unlawful.

An example of unlawful positive discrimination would be where an employer recruits a person because they have a relevant protected characteristic rather than because they are the best candidate. For example, it would be unlawful to hire someone simply because their team was under-represented by woman and the candidate is hired because they are a woman.

However, if under-representation is an identified issue, then you could take steps to promote vacancies to this group or provide extra support for them to apply. This is positive action.

The difference between positive action and positive discrimination can be difficult to define and is determined by the particular situation. It is important to reflect upon whether any element of your service necessitates positive action. It is critical that you satisfy your duty under the Equality Act and therefore if you have any concerns, please seek further guidance/or legal advice before continuing.

Equality Impact Assessment (EqIA)

Section 1: About the proposal or policy

Name of proposal or policy or project:

Local Plan Part 2 (LP2) – Site Allocations

Name of lead officer and contact details:

Alpa Depani

Name of service and directorate for this proposal or policy:

Place Directorate

Strategic director responsible for this proposal or policy:

Ian Rae

Date the EqIA was started:

19-04-2024

What kind of proposal or policy is this assessment for?

Tick all that apply.

- Change in service delivery or new service
- Change in policy or new policy
- Grants and commissioning
- Budget change or service cut
- Other - if ticked, please give more detail: Click or tap here to enter text.

Section 2: Proposal or policy summary

Please give a summary of this proposal or policy

Give brief details of:

- What the proposed decision or change is.
- The reasons for this decision or change.
- The outcomes you are hoping to achieve.

What is the proposed decision or change?

The new Waltham Forest Local Plan provides an Inclusive Growth framework that will reduce inequalities and deliver benefits for all communities across the borough, in line with all six Mission Waltham Forest Borough missions.

The new Waltham Forest Local Plan is in two parts. Part 1, adopted on 29 February 2024, establishes the borough-wide spatial strategy, based around 16 Strategic Locations. These have been identified as the most sustainable locations for future inclusive growth – each with its own supporting masterplans and assessment of existing and planned infrastructure.

Part 2 (the subject of this EqIA) will complement Part 1 by allocating specific sites for inclusive growth and setting clear expectations for the type of development (including any site-specific infrastructure requirements) that we would support and the quality of design that we would expect.

This EqIA document has been prepared to support Local Plan Part 2 (Site Allocations document). A separate EqIA document was prepared on Local Plan Part 1 (Strategic Policies document).

What are the reasons for the decision or change?

The key components of LP2 include the following:

- An introduction setting out the purpose of the document, its relationship to LP1 and planning policy background. The introduction will also reference the evidence base that underpins the Local Plan and the

supporting documents required by statutory regulations – the Sustainability Appraisal and the Habitats Regulations Assessment.

- A clear methodology demonstrating the site selection process that has been undertaken.
- The Site Allocations themselves, consisting of a site plan with red line boundary, description and relevant information for each site (including relevant planning history), Public Transport Accessibility Level (PTAL) rating, Flood Zone, existing planning policy designation(s). Each site allocation will also set out Site Requirements (i.e. a written description of what the site is expected to deliver), the appropriate approach to character-led intensification (Reinforcement, Transition, or Transformation) and a ‘place-making plan’ setting out visually the key design constraints and opportunities. .
- A section on Implementation & Monitoring, establishing the mechanisms by which the Plan will be implemented and how progress, deliverability and effectiveness will be monitored. This will be written and applied in conjunction with the monitoring indicators proposed in LP1, and will include monitoring commercial/ employment and retail space, the delivery of new green spaces (in line with the requirements of Natural England) - and the numbers of visitors using them, and the number of vehicular trips to/from sites to ensure a positive impact on air quality in the borough.

What outcomes are you hoping to achieve from this change?

The evidence behind Part 1 of the Local Plan, and accepted by the independent Planning Inspectors, shows that we need to build 1,810 new homes every year to address housing need in the borough. Further, the evidence confirms that there is the capacity to go as far as possible to meeting this need by building an average of 1,800 homes per year, or 27,000 new homes over the fifteen year ‘Plan Period’ (2020-2035).

The evidence also shows that we need to deliver 52,000sqm of new employment floor space. The supporting Infrastructure Delivery Plan (IDP) sets out the new infrastructure that will be required to support this planned inclusive growth. The IDP is a ‘live’ document that is currently under review and resultant new evidence of infrastructure need is being incorporated into Local Plan Part 2.

By allocating specific sites, Local Plan Part 2 develops further the spatial vision and targets for planned growth to meet the borough’s needs as set out in Local Plan Part 1, sets clear expectations for the placemaking value and Exemplar Design quality expected on each site and provides a framework for determining future planning applications.

Who will be affected by this proposal or policy?

For example: staff, service users, or the wider community

The Local Plan is a long term, inclusive growth strategy for Waltham Forest for 2020-2035. It establishes how we can go as far as possible to meet the need for new affordable homes, maximise local jobs and employment space and deliver a whole range of community infrastructure (including health and education facilities, early years provision, public transport/station improvements, facilities for young people and new cultural amenities). It is intended as a means for ensuring development has a positive impact throughout the borough including its spaces and its communities.

LP2 will be relevant for all those who wish to understand or engage in the future of the borough and the process of achieving inclusive growth, this includes council officers across teams, landowners, developers, architects and other built environment professionals, politicians and members of public.

Section 3: Equality analysis

This section asks you to consider the potential impact of the proposed decision or change on the protected characteristics and the mitigations that will be taken to avoid or counteract any negative impact identified. If no negative impact has been identified for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one or more of the following protected characteristics. Think about what action you can take to address their specific needs. In addition, you may wish to consider the short-, medium- and longer-term implications, intersectionality between the different characteristics, as well as mitigations that may be required.

Age

This can refer to people who have, for example, a specific age, or who are in a specific age range.

Will the proposed change have a differential impact [positive or negative] on people of a specific age or age group (e.g. older or younger people)?

Explain why this group may be affected.

The site allocations document (LP2) is expected to have a positive impact on both children and older people. All developments on allocated sites will be required to provide amenities and play areas in accordance with the specific policies outlined in LP1. Additionally, where appropriate, written site requirements will reference the necessity for play spaces.

Furthermore, all allocated sites will contribute to promoting healthier lifestyles and improving health and well-being for all age groups. This includes maintaining and enhancing public transport services, encouraging active and sustainable travel, and reducing CO2 emissions from cars. These measures align with LP1 policies aimed at improving connectivity to green and open spaces, thus benefiting a wide range of age groups.

Mitigating actions to be taken

None required

Sex (gender)

Sex refers to whether you are a man or a woman.

Will the proposed change to service/policy have a differential impact [positive or negative] on people of a specific sex (e.g. women, men)?

Explain why this group may be affected.

The site allocations document (LP2) will have a positive impact on individuals of all genders.

Mitigating actions to be taken

None required

Ethnicity and race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will the proposed change to service/policy have a differential impact [positive or negative] on people of a certain race?

Explain why this group may be affected.

The site allocations document (LP2) will have a positive impact on individuals from diverse racial and ethnic backgrounds. Developments on allocated sites as identified by LP2 will be expected to align with policies set out in LP1. The 50% affordable housing target in LP1 policy is anticipated to benefit lower-income groups which may also intersect with other specific groups e.g. those disadvantaged by reason of race.

Mitigating actions to be taken

None required

Religion or belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism) and includes lack of belief (e.g. Atheism). Belief includes any religious and philosophical belief including lack of belief (e.g. Atheism).

Will the proposed change to service/policy have a differential impact [positive or negative] on people who follow a religion or belief, including lack of belief?

Explain why this group may be affected.

The site allocations document LP2 aligns with the inclusive policies set out in in LP1 which support the diverse needs of the borough’s residents including those of different faiths.

LP1 policies emphasise the creation of inclusive communities through several key policies. It prioritises the development of community infrastructure that benefits all residents, ensuring that spaces for worship and community activities are accessible and well-integrated within developments. This approach helps to foster social cohesion and supports the needs of various faith groups.

Mitigating actions to be taken

None required

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person’s ability to carry out normal day-day activities.

This could include physical impairment, hearing impairment, visual impairment, learning difficulties, long-term illness or health condition, mental illness, or other impairments.

Will the proposed change to service/policy have a differential impact [positive or negative] on people with disabilities?

Explain why this group may be affected.

The site allocations document (LP2) is expected to have a positive impact on individuals with disabilities. The policies outlined in LP1 on Accessible and Adaptable Housing will specifically support those with disabilities as well as older age groups who are more likely to require and benefit from accessible housing.

Developments on allocated sites will be required to incorporate accessible and adaptable housing solutions, as set out in LP1, ensuring that the needs of individuals with mobility impairments and other disabilities are met. This will enhance their quality of life by providing safe, comfortable, and inclusive living environments.

Additionally, the emphasis on promoting healthier lifestyles, improving accessibility to public transport, and enhancing connectivity to green and open spaces will further support the well-being of disabled individuals.

Mitigating actions to be taken

None required

Sexual orientation

This refers to whether a person is attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, or asexual.

Will the proposed change to service/policy have a differential impact [positive or negative] on people with a particular sexual orientation?

Explain why this group may be affected.

The LP2 site allocations document is expected to have positive impact on individuals of all sexual orientations.

Development on allocated sites as identified by LP2 will be expected to align with policies set out in LP1 relating to cultural activities and venues, including pubs, as integral parts of community. Where appropriate, written site requirements and placemaking plans will identify where sites within LP2 are expected to provide cultural

infrastructure. By promoting cultural diversity and safeguarding culture, LP1 and LP2 support spaces where LGBTQ+ cultural and community events can thrive.

Mitigating actions to be taken

None required

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will the proposed change to service/policy have a differential impact [positive or negative] on pregnancy and maternity?

Explain why this group may be affected.

LP2 will have a positive impact on pregnancy and maternity since development of allocated sites as set out in LP2 will be expected to deliver accessible and inclusive spaces that support the needs of pregnant women and parents with young children in line with LP1 policies. One of the key focuses of LP1 policies is to ensure that public spaces, amenities and residential developments are accessible, facilitating ease of movement for individuals with prams and young children.

Mitigating actions to be taken

None required

Gender reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

According to a [2020 landmark Employment Tribunal ruling](#), people who identify as gender fluid and non-binary or transitioning are protected under this section of the Equality Act and should therefore be considered as part of your assessment.

Will the proposed change to service/policy have a differential impact [positive or negative] on transgender people?

Explain why this group may be affected.

The sites identified in the LP2 site allocations document will be delivered in line with inclusive policies set out in LP1 that supports and protects the needs of all residents, including transgender individuals, and thus will have a positive impact on transgender people. Specifically, the affordable housing targets set in LP1 aim to provide secure, inclusive, and affordable housing options. These housing policies help mitigate housing discrimination and economic challenges that transgender individuals may face, ensuring they have access to safe and stable living conditions.

Mitigating actions to be taken

None required

Marriage and civil partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the UK both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will the proposed change to service/policy have a differential impact [positive or negative] on people in a marriage or civil partnership?

Explain why this group may be affected.

The site allocations document LP2 will have a positive impact on people in a marriage or civil partnership since they will be delivered in line with the policies set out in LP1 which support the needs of all residents including people in marriages and civil partnerships. Additionally, LP1's commitment to delivering 27,000 new homes by 2035, with a significant portion being affordable, directly benefits families/couples seeking stable and secure housing. Moreover, LP1 policies aim to improve public transport and connectivity to green spaces, promoting a higher quality of life.

Mitigating actions to be taken

None required

Care Leavers

Will the proposed change to service/policy have a differential impact [positive or negative] on people who are care leavers?

Explain why these groups may be affected.

The sites identified in the LP2 site allocations document will have a positive impact on the needs of Care Leavers since they will be delivered in alignment with LP1 policies on housing, jobs, accessibility, health and wellbeing, social and community infrastructure and air quality. The aim to deliver 27,000 new homes with substantial portion dedicated to affordable housing ensures that low-income families and individuals have access to secure, affordable and quality housing. The Local plan also emphasises economic development by creating job opportunities within the borough. The plan supports local businesses and encourages new enterprises, aiming to generate over 1,100 new jobs and numerous apprenticeships.

Together, these policies aim to create a more equitable and supportive environment for socio-economically disadvantaged groups, ensuring they benefit from the borough's growth and development.

The 50% affordable housing target in LP1 policy is anticipated to address socio-economic inequality. Well designed housing, including affordable housing can significantly improve the quality of life for these groups by providing greater access to safe, secure, and affordable living conditions.

Mitigating actions to be taken

None required

Other structurally disadvantaged groups

The [State of the Borough report](#) identifies a number of groups that might suffer from structural disadvantage in Waltham Forest. These groups should also be taken in account when assessing proposal or policies and include:

- People experiencing socio-economic inequality or geographic deprivation
- Residents with long-term health conditions
- People with caring responsibilities

- Survivors of domestic violence
- Migrants, including refugees and asylum seekers
- Homeless people and people at risk of homelessness
- People who are experiencing long-term unemployment

There might be other structurally disadvantaged groups that you know from your service data might experience a differential impact based on your proposal or policy. This may include how your work impacts on the social, economic and environmental conditions in which people live, work and age that influence health outcomes. Please consider these groups in this section as part of your equalities impact assessment.

Will the proposed change to service/policy have a differential impact [positive or negative] on other structurally disadvantaged groups?

Explain why these groups may be affected.

The sites identified in LP2 site allocations document will be delivered in alignment with LP1 policies focusing on affordable housing, creating job opportunities in the borough, improving air quality by minimising environmental impact through car free development, meaning there will be a positive impact on structurally disadvantaged groups. The Local Plan also includes policies to support sustainable industrial development, ensuring that industrial areas are well-integrated and provide job opportunities benefiting disadvantaged groups by offering stable employment options.

The site allocations will improve accessibility to green and open spaces including parks, recreational and community spaces that are welcoming and safe for everyone by creating safer streets, better lighting and more pedestrian friendly pathways encouraging outdoor activities and community interactions.

In the site allocations document (LP2), the specific site requirements and placemaking plans will further detail the implementation of these policies. Together, the policies and site requirements and placemaking plans in LP2 will support create a more equitable and supportive environment for socio-economically disadvantaged groups, ensuring they benefit from the borough’s growth and development.

Mitigating actions to be taken

None required

Section 4: Monitoring and reviewing

Use this section to say:

- How you intend to monitor and review the effects of this proposal or policy
- Who will be responsible for assessing its effects

LP2 the site allocations document includes a section on implementation & monitoring, establishing the mechanisms by which the Plan will be implemented and how progress, deliverability and effectiveness will be monitored. Following the adoption of Waltham Forest Local Plan Part 1, a monitoring framework including Targets, indicators and triggers for review has been established which is applicable to the site allocations Local Plan. There is a dedicated information and monitoring officer overseeing this process and an authority monitoring report on the performance of both plans published annually.

Section 5: Positive impacts on advancing equalities and fostering good relations

Highlight any benefits the proposal or policy has to:

- Advance equality for our residents
- Foster good relations between different protected characteristic groups
- Improve health outcomes by making positive changes to the conditions in which residents live, work and age

The Local Plan Part 1 (LP1) and Part 2 (LP2) are designed with strong emphasis on advancing equality and fostering good relations across all protected characteristics. The plan integrates various policies and strategies to ensure an inclusive and supportive environment for all residents. The Local Plan ensures that new housing developments are inclusive, offering a mix of affordable and accessible homes that cater to diverse needs, including those of socio-economically disadvantaged groups. By mandating a significant portion of affordable housing, the plan directly addresses housing instability for all residents. Public spaces and community infrastructure are designed to be accessible and welcoming to everyone. This includes the creation of safe, inclusive parks, recreational facilities, and community centres that cater to families, young people, the elderly, and individuals with disabilities. These spaces are designed to foster social interaction and community cohesion, promoting positive relations among residents of different ages, abilities and backgrounds. The Local Plan also prioritises the creation of local job opportunities and support economic development. By encouraging new businesses and supporting existing ones, the plan aims to reduce unemployment and create a stable economic environment. The focus on local economic growth benefits all residents, including those from socio-economically disadvantaged backgrounds, and helps retain wealth within the community. Improving air quality is a key component of the Local Plan, with measures in place to reduce pollution and enhance public health. These initiatives are crucial for protecting the health of all residents, particularly those from lower-income groups who may be more vulnerable to the adverse effects of pollution. The Plan's policies on safety and security aim to create safer streets through improved urban design, better lighting and enhances community policing. These measures help reduce crime and create a more welcoming environment for everyone, fostering a sense of safety and well-being across the community. Additionally, the Local Plan promotes cultural diversity and inclusivity by preserving local heritage and encouraging community events that celebrate different cultures and beliefs. This approach fosters mutual respect and understanding among residents of various backgrounds, promoting social cohesion and positive relations.

Section 6: Conclusion

Set out your conclusions from the analysis of the proposal or policy.

If there are negative equalities impacts, but you think that the proposal or policies should still proceed in the current or amended form, please provide evidence and an objective explanation as appropriate.

If it is helpful, refer to other documents e.g. a Cabinet report. You may find it helpful to identify one of the four outcomes below as being closest to your current proposal or policies. (Use your conclusions as a basis for the "Equalities Implications" in the Cabinet report.)

This analysis has concluded that the Local Plan Part 2 (LP2) site allocations document effectively integrates a wide range of policies designed to advance equality and foster good relations among all residents, particularly those with protected characteristics. LP2 builds on the inclusive principles set out in LP1, ensuring that site allocations promote affordable and accessible housing, create local job opportunities, and improve public health through better air quality and safer streets. Overall, the Local Plan Part 1 & 2 demonstrate a comprehensive commitment to advancing equality and fostering good relations among all residents. By integrating inclusive housing policies, accessible public spaces, economic development initiatives, and environmental improvements, the plan ensures that the needs of all protected characteristics are met, creating a cohesive and supportive community.

Outcome of Equality Impact Assessment check one that applies

- **Outcome 1:** No major change required when the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.
- **Outcome 2:** Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments would remove the barriers identified?
- **Outcome 3:** Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the

duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

- **Outcome 4:** Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Section 7: Signatures

Signed off by SRO for the proposal or policy/project:

Name:

[Click here to enter text.](#)

Date:

[Click here to enter text.](#)

Section 8: Version control

Status	Version	Author	Date	Changes made