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Translation

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Abanian 🗆	Gujarati 🗆
يمكن توفير هذه الوثيقة أو ملخصها بلغات أخرى أو بالطبعة الكبيرة أو بلغة بريل أو على الشريط, ويمكن توفير خدمة ترجمة عند الطلب, وإذا احتجت منالا من هذه الخدمات الرجاء الاتصال معنا على العنوان المذكور أدناه.	यह पर्चा या इसका संक्षेप अन्य भाषाओं में, बढ़े अक्षरों में या सुनने वाली टेप पर माँग कर लिया जा सकता है, और अन्य भाषाओं में अनुवाद की सुविधा भी मिल सकती है। यदि आपको इन सुविधाओं की जरूरत है तो कृपया निम्निलिखित पते पर हमारे साथ संपर्क करें।
Arabic 🗆	Hindi 🗆
অনুরোধক্রমে এই ভকুমেন্ট অথবা এর সারমর্ম অন্যান্য ভাষাম, বড় ছাপার অক্ষরে, ব্রেইল বা অদ্ধানিতি, অভিও টেইপ বা বাজিয়ে পোনার কেসেটে অথবা অনুবাদ করে সেয়ার ব্যবস্থা করা যাবে। আপনার যদি এসব সেবাসমূহের গ্রেমাজন হয়, ভাহলে অনুষ্ঠ করে আমাসের সাথে নীচের ঠিকানায় যোগাযোগ করন।	ਇਹ ਪਰਚਾ ਜਾਂ ਇਹਦਾ ਖ਼ੁਲਾਸਾ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ, ਵੱਡੇ ਅੱਖਰਾਂ ਵਿਚ, ਜਾਂ ਸੁਣਨ ਵਾਲੀ ਟੇਪ 'ਤੇ ਮੰਗ ਕੇ ਲਿਆ ਜਾ ਸਕਦਾ ਹੈ, ਅਤੇ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ ਤਰਜਮਾ ਕਰਨ ਦੀ ਸਹੂਲਤ ਵੀ ਮਿਲ ਸਕਦੀ ਹੈ। ਜੇ ਇਹਨਾਂ ਸਹੂਲਤਾਂ ਦੀ ਤੁਹਾਨੂੰ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਸਾਡੇ ਨਾਲ ਸੰਪਰਕ ਕਰੋ।
Bengali □	Punjabi 🗆
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1.Introduction

Purpose

- 1.1. An equality impact assessment (EqIA) is an evidence-based approach to policy development intended to ensure that policies, practices and decision-making processes are fair and do not present barriers to participation or disadvantage for protected groups. In the context of the Local Plan, this covers plan policies and proposals.
- 1.2. This document is the Equalities Impact Assessment (EqIA) of the Council's Proposed Submission Local Plan (LP1). As a result of previous consultation undertaken under regulation 18 the Council has a duty to consider representations and comments received, and to make any necessary changes to policies in order to make the plan sound. The Council has now considered these representations and will publish the Plan in October 2020 for a period of six weeks under regulation 19. All representations received will then be submitted to the Secretary of State for consideration by an appointed Inspector. Accordingly, the findings from the previous assessment has been reviewed and updated on the new versions of the Local Plan and this document. This process will be ongoing as the Plan further evolves through the examination stage until final adoption.
- 1.3. The Equality Impact Assessment (EqIA) analyses proposed policies to assess their effects on people with protected characteristics as covered by the <u>Equality Act 2010</u>. There are three aims of the Equality Act, these are:
 - Eliminate Unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the act;
 - Advance Equality of Opportunity, between people who share protected characteristics and those who don't;
 - Foster Good Relations, between people who share a protected characteristic and people who do not share it.
- 1.4. In carrying out this assessment, the Council has been mindful of the following questions:
 - Whether the policy approach is likely to exclude a specific equality group or community
 - Does it affect some equality groups or communities differently and can this be justified?
 - Is the proposal or service to be delivered by the policy likely to be equally accessed by all equality groups and communities? If not, can this be justified?
 - Are there any barriers that might make access difficult or stop different groups or communities accessing the proposal or service to be delivered by the policy?
 - Could the policy promote equality and good relations between different groups?
 - 1.5. In this assessment, the Council has examined the potential impacts of policies on

particular communities or Protected Characteristic Groups (PCGs)¹ to ensure that the legal requirements of the Public Sector Equality Duty (PSED) are being met. The Local Plan seeks to promote social inclusion and ensure that all people (including vulnerable groups) have access to the services and opportunities that they may need such as housing, employment, public transport and community facilities (e.g. education, health and local shopping). The approach undertaken for the EqIA draws on guidance for the appraisal of equality impacts produced by the Equality and Human Rights Commission (EHRC).

- 1.6. The EqIA report for the Waltham Forest Proposed Submission Plan (Regulation 19) includes:
 - Identification of the borough's Protected Characteristics;
 - Brief of the public consultation activities that will be undertaken from October 2020;
 - The assessment (Table 4.2 and 4.3) reflecting the results and recommendations of the Local Plan (Reg 19); and
 - Conclusions and further EqIA activities to be undertaken (Chapter 5).

2. Equalities baseline

Introduction

2.1. This section provides an overview of the study area with regards to equalities. It includes a baseline profile, drawing on a range of relevant data from the Office for National Statistics (ONS) 2011 Census and statistical bulletin 2018 and 2019, GLA 2018-based population projections (BPO) and 2017-based housing-led population projections; and additional sources including the ONS Integrated Household Survey, Metropolitan Police and TfL reports. The baseline provides a demographic profile of the London Borough of Waltham Forest, including the proportion of residents sharing protected characteristics. To provide context for comparison purposes, data for London as a whole is also presented, as well as National (UK), England and Wales.

The Study Area

Overview

- 2.2. The study area for the EqIA encompasses the London Borough of Waltham Forest. Waltham Forest is located to the north east of central London and will play an exciting part in the overall regeneration of the capital. The borough is an active participant in the UK Innovation Corridor, which along with the borough's role in the Mayor's Upper Lea Valley Opportunity Area has contextualised the regeneration opportunities being realised in the Blackhorse Lane Area of the borough.
- 2.3. The borough is relatively small in comparison with other Outer London boroughs at 3,880 ha in area, where approximately 27% is Green Belt or Metropolitan Open Land

¹ Protected characteristics include age, sex, religion/belief, race, ethnicity, gender reassignment, sexual orientation, pregnancy and maternity, disability, lower income communities and marriage/civil partnership.

- (MOL), concentrated primarily on the western aspect. Although, the borough has a typically urban density in the south with much street life and entertainment, the north of the borough has a quieter, low-density residential character with generous green spaces.
- 2.4. Figure 2 shows how the Local Plan divides the borough into sub-areas of South, Central and North to focus new regeneration and investment activity. Within each subarea it identifies a number of neighbourhood development centres, referred to as strategic locations.

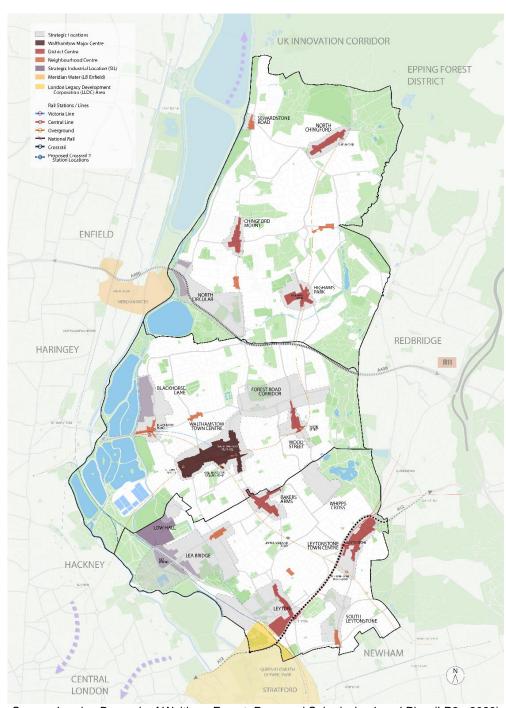


Figure 2 Local Plan, Waltham Forest sub-areas (2020)

Source: London Borough of Waltham Forest, Proposed Submission Local Plan (LP2 - 2020)

Profile of protected characteristic groups

Population

- 2.5. As Waltham Forest is a London borough, this assessment uses the <u>GLA's population projections</u> over the <u>ONS's subnational population projections</u>. The population of Waltham Forest in 2019 was estimated to be 275,909 an average-size for London.
- 2.6. Between 2019 and 2035, Waltham Forest's population is projected to increase by 52,000 (19%) and to reach over 328,000 by 2035².

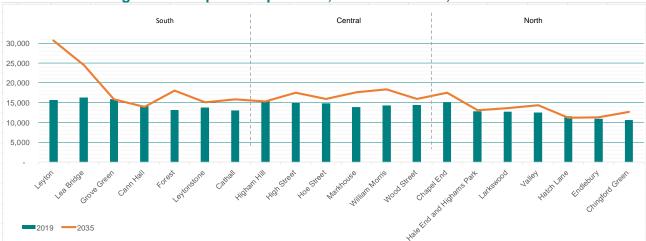


Figure 2.1: Population per ward, Waltham Forest, 2019 and 2035

Source: GLA, 2018-based ward population projection, Borough Preferred Option (BPO), 2020

2.7. Figure 2.1 provides a better understanding of the population per ward in the borough according to the GLA projections (2020). As it shows, the south of the borough had more than 101,000 residents in 2018, representing the 37% of Waltham Forest's population, whist Central and North have the 32% and 31% respectively.

Age

2.8. The research presented in this EqIA considers a range of groups including children, younger people (aged 16-24 years old) and older people (65-84 and 85+ plus years old). Figure 2.2 provides a breakdown of ages for Waltham Forest, according to the GLA (2020)³, where it shows that the 66% of the population are aged between 18 to 64 years; whilst people aged between 0 to 17 and over 65 years represent the 24% and 11% of the population respectively.

 ² Greater London Authority (GLA) 2017-based housing led population projections, Borough Preferred Option (BPO). Available at https://data.london.gov.uk/dataset/gla-population-projections-custom-age-tables
 ³ GLA 2017-based housing led population projections, Borough Preferred Option (BPO) at https://data.london.gov.uk/dataset/gla-population-projections-custom-age-tables

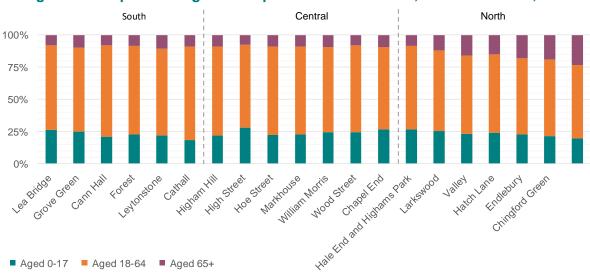


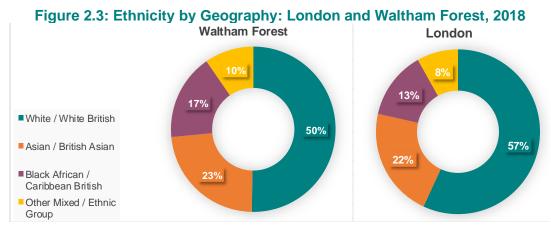
Figure 2.2: Population Age Profile per ward and location, Waltham Forest, 2019

Source: GLA, 2018-based ward population projection (BPO), 2020

2.9. Figure 2.2 also shows the North of the borough has a higher proportion of residents aged over 65 with an average of 16% compared to wards in the Central and South areas with 9%.

Ethnicity and Race

- 2.10. Waltham Forest is one of the most ethnically diverse areas in London. Figure 2.3 shows the breakdown of ethnicity⁴ by geography; the proportion of the population of Black, Asian and Minority Ethnic (BAME) origin is significantly higher in Waltham Forest (50%) than in London as a whole (43%).
- 2.11. The second biggest ethnic group in the borough is Asian/Asian British (23%), followed by Black African / Caribbean and Black British groups (17%). Again, these proportions are higher than for London as a whole. Residents with Mixed/Multiple ethnicities and those categorised in any other ethnic group each account for 10% of the borough's population, similar to the London average.



Source: GLA, based housing led population projections (BPO), 2017

⁴ The Ethnicity groups are: **White / White British** (White English/Welsh/Scottish/Northern, White Irish and Other White); **Mixed / Other Ethnic Group** (White and Black Caribbean, African, Asian, Arab, Other Mixed); **Asian / British Asia** (Indian, Pakistani, Bangladeshi, Chinese, Other Asian); **Black African / Caribbean British** (Black, African, Caribbean, Black British, Other Black)

2.12. Figure 2.4 shows the proportion of the population in each area of the borough that is from a Black, Asian and Minority Ethnic (BAME) origin. This is significantly higher in the South (58%) and Central (51%) areas, compared to the North (31%).

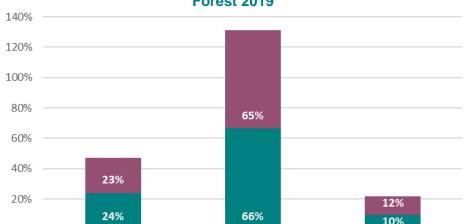
North Central South 0% 60% 10% 20% 30% 40% 50% 70% 80% 90% 100% ■ White / White British Asian / British Asian ■ Black African / Caribbean British ■ Other Mixed / Ethnic Group

Figure 2.4: Ethnicity in Waltham Forest by area, 2011

Source: ONS, 2011 Census, 2011.

Sex / Gender

2.13. Table 2.5 shows the distribution of men and women in the borough across different ages-groups. Waltham Forest has a similar distribution by age for men and women, with a slightly higher proportion of women in the over 65 group (12% against 10%).



Aged 18-64

■ Male ■ Female

Aged 65+

Figure 2.5: Population breakdown by Sex and Geography: London and Waltham Forest 2019

Source: GLA, 2018-based ward population projection (BPO), 2020

Aged 0-17

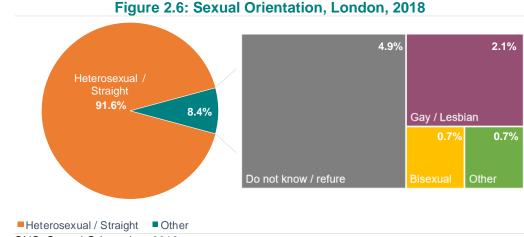
Sexual Orientation

0%

2.14. Figure 2.6 shows the UK statistical bulletin by the ONS in 2018⁵ on Sexual Orientation; where the 91.6% as heterosexual or straight while the 2.1% of London residents identified as gay or lesbian; 0.7% as bisexual; 0.7% as an 'other' sexual

⁵ Office for National Statistics (ONS); Sexual Orientation, 2018: UK statistical bulletin at https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2017

identity; and 4.9% declined to say or do not know.



Source: ONS, Sexual Orientation, 2018

2.15. London had the largest proportion of adults identifying as LGBT+ in 2018⁶ - 2.8% of the population. In 2016⁶, around 5.1% of economically active Londoners identified as a member of the LGBT+⁷ community.

Gender reassignment

2.16. There are no official statistics relating to gender reassignment and the UK Census currently only collects data relating to sex (gender assigned at birth). The Office for National Statistics (ONS) has identified a need for information about gender identity for policy development and service planning. Work is currently being undertaken to identify the ways of capturing this information within the 2021 Census.

Pregnancy and maternity

- 2.17. There were 4,470 live births in Waltham Forest in 2018, a decrease of 5% since 2016⁸. The borough in 2018 had one of the highest general fertility rates (GFR) in London with 72 live births per 1,000 women aged 15 to 44 years; higher than London with 60 births. This is an indicator of future population growth in that area.
- 2.18. The were 1,600 deliveries from Black and Minority Ethnic (BME) group mothers ⁹ by 2018/19.

Religion or belief

2.19. Waltham Forest is a multi-faith community, reflecting the diverse population of the

⁶ Transport for London (TfL) (2019), Annual Diversity and Inclusion impact report 2018/19. Available at: http://content.tfl.gov.uk/tfl-annual-diversity-and-inclusion-impact-report-2018-19.pdf

⁷ LGBTQ+ is an inclusive way of referring to all those who do not identify as heterosexual and/or cisgender. This includes, but is not limited to, anyone who identifies as lesbian, gay, bisexual, trans, queer, questioning, intersex, asexual and/or pansexual.

⁸ ONS (2018). Births, TFR and GFR. Available at: http://www.ons.gov.uk/ons/rel/vsob1/birth-summary-tables--england-and-wales/index.html

⁹ Public Health England. Child and Maternal Health. Available at: <a href="https://fingertips.phe.org.uk/profile/child-health-profiles/data#page/3/gid/1938133222/pat/6/par/E12000007/ati/202/are/E09000031/iid/92266/age/179/sex/2/cid/4/page-options/car-do-0

borough. Figure 2.7 presents religion/belief by geography. Christianity is the main religion in the borough in 2011 London and England and Wales had 48% of residents identifying as Christian. The second most common religion in the borough is Islam (22%); this also related to the largest Muslim community. 5% of residents said they followed other religions and 18% said they don't have a religion.

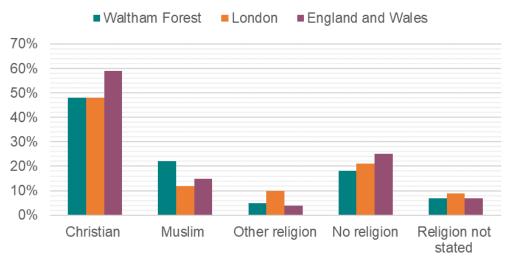


Figure 2.7: Religion/belief by geography, 2011

Source: ONS, 2011 Census, 2011.

Marriage and civil partnership

2.20. There were over 24,000,000 marriages and civil partnerships formed in England and Wales in 2018¹⁰, where 120,400, approximately 1%, were between same sex. Marriages formed between men double those between women.

Disability

- 2.21. The TfL Annual Diversity and Inclusion impact report 2018/19 states that 19% of the Capital's population have identified as being disabled, and 11% of economically active Londoners have a disability. Londoners over 16 years old with a disability will, by 2020, represent slightly more than 20% of people who are economically active.
- 2.22. Borough-specific data is available through the 2011 census. As many as 37,600 residents 15% of the borough population indicated in the census that their day-to-day activities are limited because of their health. 17,900 (7% of the borough population) said their activities were limited a lot, while 19,700 said they were limited a little (8%).¹¹

¹⁰ Office for National Statistics (ONS): Population estimates by marital status and living arrangements, England and Wales. Available at:

https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesbymaritalstatusandlivingarrangements

¹¹ Office for National Statistics (ONS): Disability and well-being. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability

Social-economic status Deprivation

2.23. The extent of deprivation is measured by the 2019 English Indices of Deprivation¹². People belonging to Protected Characteristic Groups (PCGs) are more likely to experience deprivation. They may suffer from poor health, have lower levels of income, or experience barriers to accessible housing, and access to services. This can lead to poor health and wellbeing outcomes, and detrimentally affect the equality of opportunity a person experience. Women, disabled people, individuals of BAME origin and older people are more likely to live-in low-income households than others.

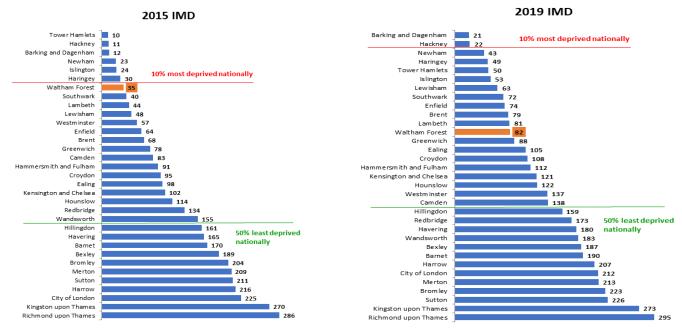


Figure 2.7: Waltham Forest - Indices of Deprivation 2019

Source: MHCLG, Indices of Deprivation 2019, Rank of Average Score

- 2.24. According to the English Indices of Deprivation and the Index of Multiple Deprivation (IMD) 2019, Waltham Forest has become less deprived from 35th to 82nd most deprived local authority in England (of a total of 326 districts, where 1 is the most deprived), and from 7th to 12th most deprived of the 33 London boroughs (figure 2.7).
- 2.25. Additionally, according to estimates from the Campaign to End Child Poverty (2013), 23% (before housing costs are factored in) and 35% (after) of children in Waltham Forest were living in poverty as of late 2013. This is higher than the UK average of 16% (before housing costs) and 25% (after). These figures are based on HMRC's definition of child poverty, where it is measured as the proportion of children living in families in receipt of out of work benefits or in receipt of tax credits where their reported income is less than 60% of median income.

Health inequalities

2.26. There is a tendency for people belonging to PCGs - particularly young, older, disabled, and BAME people - to experience poorer health and require more frequent

¹² Office for National Statistics (ONS): English Indices of Deprivation 2019. Available at: https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019

access to healthcare than others. 13

- 2.27. According to the 2014-2015 Waltham Forest Joint Strategic Needs Assessment Report (JSNA), a number of health issues also disproportionately affect LGBT+ populations:
 - 1 in 10 men who have sex with men are living with HIV, and 1 in 3 HIV positive men in major UK cities, including London, have undiagnosed HIV infection;
 - Illicit drug use among lesbian, gay and bisexual people is at least eight times higher than in the general population;
 - Approximately 25% of lesbian, gay and bisexual people indicate a level of alcohol dependency;
 - Nearly half of LGBT+ individuals smoke, compared to a quarter of their heterosexual peers;
 - Lesbian, gay and bisexual people are at higher risk of mental disorder, suicidal ideation, substance abuse and deliberate self-harm;
 - 41% of trans people report attempting suicide compared to 1.6% of the general population.
- 2.28. The borough's 2014-2015 JSNA also reports that people living on low incomes are significantly more likely to be obese for instance, 14% of women in social class 1 are obese, compared to 28% in social class 5. Obesity is also disproportionately prevalent among the Black Caribbean and Irish communities, at 24%
- 2.29. Further, 20% of the UK's South Asian community, and 17% of the Black African and Caribbean community, have Type-2 diabetes, compared to just 3% of the general population. Accordingly, rates of other health complications are higher among these groups such as heart disease (2-3 times higher among South Asians compared to the general population), renal failure (4 times higher among Asians) and stroke (3 times higher among African-Caribbeans).

Employment

- 2.30. According to the 2019-2020 ONS Annual Population Survey¹⁴, 80.5% of the population aged 16-64 in Waltham Forest are economically active (approximately 156,200 people), this is slightly higher than London (78.9%) and UK (79.1%); while 5.5% are unemployed, this is higher than both the London (4.7%) and UK figure (3.9%). Economically active men in the borough are disproportionately represented among the unemployed with 8.7% of economically active men being unemployed compared to 7.7% of women.
- 2.31. Additionally, according to the 2019 ONS Annual Survey of Hours and Earnings, full-time workers in Waltham Forest make an average of £680.2 a week. Although this is significantly higher than the UK-wide figure (£587/week), it is lower than the London

¹³ Public Health England (2018) Local Action on Health Inequalities: Understanding and Reducing Ethnic Inequalities in Health. Available at: https://www.ucl.ac.uk/epidemiology-health-care/news/2018/sep/local-action-health-inequalities-understanding-and-reducing-ethnic-inequalities-health

¹⁴ Office for National Statistics (ONS) – 2019 Labour Market Profile - Waltham Forest. Available at: https://www.nomisweb.co.uk/reports/lmp/la/1946157278/report.aspx#tabeinact

- average (£699.2/week). Women in the borough also, on average, earn significantly less than men at £641.5/week, in comparison to £719.4/week for men.
- 2.32. Men in the borough are more likely to be claiming Universal Credit compared to women with 10.7% of men in Waltham Forest being claimants compared to 8.1% of women. Overall, 9.5% of people in the borough are on Universal Credit as of July 2020, which is somewhat higher than the London-wide (7.8%) and UK-wide figure (6.5%).
- 2.33. Further, according to the 2018 ONS Business Register and Employment Survey, adults in the borough are more likely, compared to adults in the rest of London, to work in industries associated with lower wages and greater insecurity. This includes sectors such as retail (16.7% of local adults compared to 12% across London); manufacturing (4.2% compared to 2.2% across London); and construction (5.6% compared to 3.6%). Correspondingly, adults in Waltham Forest are far less likely to work in higher-paying sectors such as information and communication (2.8% compared to 7.9% across London); financial and insurance services (1% compared to 7% across London); and professional, scientific and technical services (5.6% compared to 13.7% across London).
- 2.34. The impact of the COVID-19 pandemic on different PGCs has been significant. As previous crisis and recessions, those are hit harder are recovering more slowly. Specifically, for women, alongside the lower income, elderly, disabled and BAME. Women were about one third more likely to be working in a sector that shut down, such as catering and hospitality¹⁵. These trends are likely to set back progress in gender and Ethnicity equality.
- 2.35. Waltham Forest has commissioned a COVID-19 impact study in September 2020¹⁶ which has identified the following:
 - Nearly 50,000 people have been furloughed, which is 4% higher than London.
 - 35% of non-full-time student 18-24-year-old employees are earning less than they did prior to the outbreak and an additional 640,000 18-24 year olds projected to find themselves unemployed this year.
 - Women tend to work in 'at risk' sectors, such as domestic work, retail, tourism, travel and entertainment. This means that economic downturns are likely to disproportionally affect women.
 - BAME employment is reduced by 6% in 2020/21. There are higher proportions
 of BAME workers in health and social care sector and this community also
 experiences higher rates of death due to Covid-19.
 - BAME London residents being significantly less likely to be able to work from home. In June 2020, around one third of BAME workers were working from home (34%) compared to 45% of workers who were white.
 - A smaller proportion of workers over 55s are currently working from home than any other age group: 55% of 55–59s and 56% of 60–64s. The over 50s also

¹⁵ Institute for Fiscal Studies (IFS) - 2020. Sector shutdowns during the coronavirus crisis: which workers are most exposed? Available at: https://www.ifs.org.uk/publications/14791

¹⁶ Rocket Science – 2020. Covid-19 and Waltham Forest Labour Market.

have the lowest expectations of working from home after the outbreak.

- According to Citizen's Advice, one in four disabled people are facing redundancy in comparison to one in six of the working population. Waltham Forest (18.5%) has a higher rate of working age people who are EA core or work limiting disabled than London as a whole (16.7%) and Outer London (17.3%)
- Disabled people employed before the COVID-19 pandemic have been 4
 percentage points more likely to have experienced a negative labour market
 outcome (been furloughed, had reduced hours or wages, or lost their job) than
 people without a disability.

Education

- 2.36. Based on the ONS 2011 Census¹⁷, Waltham Forest's Joint Strategic Needs Assessment (JSNA¹⁸ has identified ¹⁹that one in four (26%) Waltham Forest residents over the age of three do not speak English as their main language. This compares to 22% in London as a whole and 8% nationally. The majority, however, can speak English well or very well only about 6% of the borough's residents said that they do not speak English well or at all.
- 2.37. The ONS 2011 Census also identified the top five languages in the borough other than English as being Urdu, Polish, Romanian, Turkish and Lithuanian.
- 2.38. Further, the OFCOM Connected Nations report (2015)²⁰ says that it should be everyone's right to have a access to high speed broadband of at least 10 megabits (Mbps). Only two per cent of households in Waltham Forest with internet access do not receive broadband speeds of at least 10Mbps per second, and all households with internet access receive at least 2Mbps.

3. Consultation

Consultation process

- 3.1. The Proposed Submission Local Plan (Reg 19) will be published in October 2020 for a period of six weeks under regulation
- 3.2. As part of the consultation period, introductory leaflets will be delivered to all households and businesses across the Borough. Three separate leaflets will be produced for the three geographic areas of the borough - North, Central and South. To gain further public awareness, the Council also will publish this information in the Waltham Forest Magazine (WFM), distributed to all homes in the borough, along with printing a formal public notice.

https://www.ons.gov.uk/census/2011census/2011censusdata

¹⁷ Office for National Statistics (ONS) - 2011 Census. Available at: https://www.ons.gov.uk/census/2011census/2011censusdata

¹⁸ The Joint Strategic Needs Assessment (JSNA) is a statutory requirement for local areas and contributes to improving the health and wellbeing of local people. Available at: https://lbwf.maps.arcgis.com/apps/MapSeries/index.html?appid=9204d47eb24d4f288a7fc4c442c9f24d#

¹⁹ Office for National Statistics (ONS) - 2011 Census. Available at:

²⁰ Available at:

https://www.ofcom.org.uk/__data/assets/pdf_file/0028/69634/connected_nations2015.pdf

3.3. Local consultation workshops events across the Borough will take place, following COVID regulations, with residents, residents' associations, focus groups and Waltham Forest Youth Forum.

Consultation Responses

- 3.4. This will be published with the responses, petitions and comments received by the end of the consultation period.
- 3.5. For the new version of the plan, the Council will try to gather background information from the protected groups who will participate in this consultation. However, consultation methods will be in accordance with the Council's Statement of Community Involvement (SCI). This sought to capture the involvement of all groups regardless of gender, faith, race, disability, sexuality, age and social deprivation. Consultation methods included the following:
 - Publication of news articles and public notices in the Council's newspaper Waltham Forest News;
 - Email notifications to all registered contacts on the Council's Local Plan consultation database;
 - Copies of consultation documents made available on the Council's website and hard copies available at this Council's main office (Sycamore House) and libraries;
 - Public consultation events held throughout the borough, including exhibitions at festivals held during the consultation period and also focus group workshops targeting particular groups such as the youth forum.

4. Assessment of impacts

Approach

- 4.1. A high-level Assessment of Equality Impact has been undertaken based on current evidence, data or other information held on the identified equality groups.
- 4.2. In this assessment, a judgment has to be made as to how each of the plan policies/proposals would impact positively or negatively on the identified equality groups. Protected characteristics include age, sex, religion/belief, race, gender reassignment, sexual orientation, pregnancy and maternity and disability. This assessment also considers marriage/civil partnership and lower income communities as separate groups. As background the Equality Act 2010 identified the following:
 - A. **Age:** this refers to persons defined by either a particular age or a range of ages;
 - B. **Sex/Gender:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
 - C. **Ethnicity/Race**: Refers to protected characteristics of race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
 - D. **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
 - E. **Disability:** a disabled person is defined as someone who 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;
 - F. **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
 - G. **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth:
 - H. **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
 - Marriage and civil partnership: marriage can be between a man and a woman
 or between two people of the same sex. Same-sex couples can also have a civil
 partnership. Civil partners must not be treated less favorably than married
 couples.
 - J. Lower income communities: Communities with individuals living in a household with a) an income below 60% of the median household income in the year, b) high crime and violence rates, and c) an inadequate school system.
- 4.3. The assessment considers both (positive and negative) disproportionate and differential impacts. A disproportionate effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location. For the purposes of this EqIA, disproportionality can arise in two main ways, either:

- an impact is predicted for the area where protected characteristic groups are known to make up a greater proportion of the affected resident population than their overall representation in the Borough/ Greater London or national level; or
- Where an impact is predicted in an area predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for very elderly people).
- 4.4. A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population due to a specific need, or a recognized sensitivity or vulnerability associated with their protected characteristic, regardless of the number of people affected.
- 4.5. In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects. The EqIA will consider impacts on groups of people rather than on individuals. Justifications for each assessment will be provided as well as further recommendations where appropriate.
- 4.6. This assessment will be concerned primarily with the intended effects of policies, acknowledging that the mechanisms for achieving these outcomes may have their own Equalities impacts. Where relevant these will be noted but attention will be primarily given to the intended outcome.
- 4.7. To clarify, the assessment will only identify a positive or negative impact where:
 - The impact is expected to be greater for the assessed group than for the population of Waltham Forest as a whole; or
 - Where it affects an equality group differently from the rest of the borough's population because of specific needs or a recognised vulnerability.

Assessment

4.8. Table 4.1 outlines the scoring used for the screening assessment and Table 4.2 contains the outcomes of the equalities assessment for each of the Local Plan (Reg 19) 2020 – 2035 chapters and policies.

Table 4.1 Scoring assessment for EqIA

Potential impacts on PCGs	Scoring
Positive	
Neutral (i.e. impacts are no greater than those experienced by the population as a whole)	
Negative	

Table 4.2: Assessment of equality impacts – Proposed Submission Local Plan 2020 - 2035 (October 2020)

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Chapter	4: Spatial Strategy												
Policy 1	Presumption in Favour of Sustainable Development											No adverse impact on any characteristic group. This policy is expected to affect all of Waltham Forest's new as well as existing communities with no greater impact on any group than on those experienced by the population as a whole.	No change to this policy. The policy approach reflects national policy.
Policy 2	Scale of Growth sets out the scale of new housing and employment growth to occur within the borough.											As population continues to increase so does the demand for housing, employment and infrastructure facilities. There is also a potential shortfall in the provision of family accommodation and there is overcrowding, primarily in the private rental sector. The proposed scale of growth will address existing need. The provision of employment opportunities will have a significant beneficial impact on all groups.	reflects national/London Plan policy requirements.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 3	Infrastructure of Growth seeks to accommodate additional demands for infrastructure arising from growth and sets out the policy approach to secure such provision – involving working proactively with infrastructure delivery bodies and agencies, landowners and developers.											Securing the provision of infrastructure will be beneficial to all equality groups. Issues about access to infrastructure as a result of disability is noted. The plan contains policies to ensure that new development proposals (including the alterations, refurbishment of existing buildings, extensions and change of use of buildings) are inclusively designed and usable by all to promote equality of access and opportunity. In particular see Policies 6 and 56.	No change to this policy

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 4	Location of Growth sets out where development will take place within the borough – in identified strategic locations in South, Central and North Waltham Forest.											should particularly benefit those with disabilities, older and younger people without access to the car. It	provision of affordable housing and workspace units. See Policies

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 5	Management of Growth sets as the overarching development management principles to manage growth and change - directing and consolidating any new retail and other town centres, protecting designated areas and sites including Green Belt/MOL, conservation areas, etc and setting out implementation actions.											Achieving an appropriate balance between physical, social and economic development and environmental protection will have no differential impact - no positive or negative on the target equality groups.	No change to this policy.
Policy 6	Ensuring Good Growth sets out the overarching policy principles/conditions to deliver sustainable economic growth.											These overarching principles are expected to have a positive impact on all groups. Detailed policies on these are captured under the thematic policies of the plan, which have been separately tested for EqIA impacts.	No change to this policy.

Policies	s Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	me	Justifications Recommendations
Policy	Encouraging Mixed Use Development and Intensification seeks to increase building density (where appropriate) to make the most effective use of the land.											Developing a mix of uses will be generally beneficial to all groups by reducing the need to travel between homes, jobs and services, providing a range of activities through the day, and so increasing community safety and security and creating areas that have diverse uses and activities for all groups.
Policy	Character-Led Intensification sets out the principles (reinforcement, transition and transformation) that will be used guide change so that right forms of intensification occur at the right locations.											These principles apply on all sites and locations throughout the borough. The policy focuses on the character of local areas. The existence of pockets of deprivation in local areas is acknowledged. There is also an ethnic dimension to the distribution of 'deprived' communities but this issue is primarily related to income inequalities rather the built character of local areas.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Chapter	5: South Waltham Forest												
Policy 9	South Waltham Forest set out key priorities including growth targets, also identifying the key policies and proposals for the area and strategic locations												No recommendations or change to policy.
Chapter	6: Central Waltham Forest												
Policy 10	Central Waltham Forest set out key priorities including growth targets and priorities for the area and strategic locations												No recommendations or change to policy.

Policies		Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Chapter	7: North Waltham Forest				1								
Policy 11	North Waltham Forest, the main purpose is to set out key priorities including growth targets and priorities for the area and strategic locations											'	No recommendations or change to policy.
Chapter	8: Decent homes for everyone												
Policy 12	Increasing housing supply sets out housing targets and measures to increase housing supply											The 50% affordable housing target will be of benefit to women, BAME and lower income groups. Evidence indicates these groups need this tenure of housing more.	No recommendations or change to policy.
Policy 13	Delivering genuinely affordable housing sets out affordable housing target and delivery											iana lower income arollos — wolco	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 14	Affordable housing tenure provides details of how the affordable housing tenure is split											The 50% affordable housing target will be of benefit – women, BAME and lower income groups – which evidence indicates, tend to need this tenure of housing more.	No recommendations or change to policy.
15	Housing size and mix sets out details of a diverse range of housing											The policy does not specifically affect or benefit one protected characteristic over another.	No recommendations or change to policy.
Policy 16	Accessible and adaptable housing sets out details of quality and accessibility expectations for new housing											The proposed approach will support those with disabilities and older age groups who are more likely to require and benefit from accessible housing.	No recommendations or change to policy.
	Redevelopment and intensification of existing housing and housing estates sets out the approach to infill development and estate regeneration											No change specifically affects one protected characteristic over another.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 18	Other forms of housing provides a detailed approach to Build to Rent, Student and Purpose Built Shared Housing											The policy does not specifically affect or benefit one protected characteristic over another.	No recommendations or change to policy.
	Small sites, sets out the approach of small housing sites											The policy does not specifically affect or benefit one protected characteristic over another.	No recommendations or change to policy.
Policy	Housing in multiple occupation (HMO) and conversions sets out the approach to conversions of homes											HMOs are generally occupied by those on lower incomes. This policy seeks to ensure that this housing is of higher quality and ensure that people are housed properly.	No recommendations or change to policy.
Policy 21	Downsizing sets out approach to housing for people aged over 55 years											The policy benefits older people as it seeks to provide suitable housing for them.	No recommendations or change to policy.
Policy 22	Supported and specialist accommodation sets out the approach to specialist and supported housing											The proposed approach will support those with disabilities, or who are older, and require specialist and supported housing.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 23	Gypsies and travellers policy sets out the needs of these groups and their pitches											INVINCIAS ANA TRAVAITINA	No recommendations or change to policy.
Policy 24	Community-led housing, self- build and custom build housing supports the above schemes and projects											INMACIAN CHARACIANGIIC NVAL	No recommendations or change to policy.
Chapter	9: Building a Resilient and Creat	ive	Ec	onc	omy								
Policy 25	Supporting and boosting economic growth and jobs creation sets out the overall objectively assessed need and employment types											•	No recommendations or change to policy.
Policy 26	Safeguarding and Managing Strategic Industrial Locations (SIL) seeks to manage change in industrial areas meet the future needs of the economy and accommodate future jobs growth											INNSHIVE EHERT ON THOSE ON INWEL	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 27	Safeguarding and Managing Local Significant Industrial Sites (LSIS) seeks to manage change in industrial areas meet the future needs of the economy and accommodate future jobs growth											INNSITIVA ATTACT ON THOSA ON INWAT	No recommendations or change to policy.
Policy 28	Safeguarding and Managing Borough Employment Areas seeks to manage change in industrial areas meet the future needs of the economy and accommodate future jobs growth											innsitive effect on those on lower	No recommendations or change to policy.
Policy 29	Approach to non-Designated Employment Land seeks to manage change in non-designated industrial areas to meet the future needs of the economy and accommodate future jobs growth											inasitive ellect on thase on lawer	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	 Justifications	Recommendations
Policy 30	Industrial Masterplan Approach seeks to manage change in industrial areas											o recommendations or change policy.
Policy 31	Co-location Design Principles										In mitigation between trial and non-industrial uses e important to ensure that coon can be delivered ively. No expected effects on rotected characteristic.	o recommendations or change policy.
Policy 32	Workspaces protects and promotes small and medium size enterprises										shace which may help those I	o recommendations or change policy.
_	Affordable Workspace seeks to provides low-cost affordable workspace to keep, seed and grow local businesses										iein innse on inwei incomes i	o recommendations or change policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 34	Local jobs, skills and procurement sets out a policy for S106 contributions related to skills and training											• •	No recommendations or change to policy.
Policy 35	Railway arches supports the redevelopment of these spaces											INO EXPECTED EFFECTS OF ANY PULL	No recommendations or change to policy.
Chapter	10: Promoting Culture and Creat	ivit	у										
Policy 36	Promoting culture and creativity: Protecting and enhancing cultural venues, spaces, facilities and uses as well as activities and initiatives												Collecting data on equalities and accessibility of those culture venues and activities.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 37	Protecting Public Houses (Pubs) protects the assets that promote community cohesion and leisure and that offer a mix of uses and activities											The preservation of pubs will have a positive impact across groups. Pubs can provide important accessible and affordable cultural spaces and activities for social interaction for people from different backgrounds, especially in areas of deprivation. The policy encourages communities and groups to take an active role in decision making and future management of pubs through the ACV process. In practice not all groups are able to use such venues for cultural and other reasons as they may not be welcoming, accessible and safe.	No recommendations or change to policy.
Policy 38	Blackhorse Lane Creative Enterprise Zone sets out the support for emerging clusters of creative, digital and cultural industries in identified area.											This policy seeks to promote creative and affordable workspaces, as well as live-work spaces and business support to creative people and small business.	No recommendations or change to policy.

Policies Chapter	Description 11: Distinctive Town Centres and	Age Hi	Sex / Gender	Lthnicity/Race	Religion/Belief	 Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	ē	Justifications	Recommendations
Policy 39	Hierarchy of centres sets out the requirements for sustainable distribution of town centre facilities and services										positive benefits for all. These locations are well	A policy setting out a hierarchy of centres is required in accordance with national and London Plan policy. No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 40	New retail, office and leisure developments seeks to direct new investment in town centres uses and other supporting services and facilities											The policy seeks to safeguard the vitality and viability of the borough's town centres and prevent the development of shopping facilities at inaccessible out-of-centre locations, which could have led to the exclusion of some groups.	No change to this policy as it reflects national/London Plan policy requirements.
Policy 41	Revitalisation, adaptation and regeneration in designated centres and parades seeks to manage retail decline by consolidating retail activities											Designated centres and parades are the most accessible locations in the borough. The focus on regeneration, enhancement, and adaptation will support the long-term sustainability of these places as central locations for the provision of a wide range of shopping and other town centre services and facilities. This will have positive benefits for all groups.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	ಶ	Lower income	Justifications	Recommendations
Policy 42	Managing Changes of Use in primary shopping areas aims to ensure that major and district centres continue to provide convenient and accessible shopping and town centre facilities													No recommendations or change to policy.
Policy 43	Managing Changes of Use outside primary shopping areas of Waltham Town Centre and the District Centres seeks to provide opportunity for a range of town centre uses (of non-retail nature) to locate outside the designated primary shopping area												These are areas where greater diversity of use is encouraged. These locations are within the designated town centre boundary and therefore still accessible by all town centre users and visitors, including the target equality groups. This policy is expected to have a positive benefit for all groups.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
	Managing Changes of Use in neighbourhood centres and local retail parades seeks to provide opportunity for a range of uses to locate within designated neighbourhood centres and local retail parades											·	No recommendations or change to policy.
Policy 45	Managing changes of use in Non-Designated Areas seeks to manage changes of use (where planning policy is required) to ensure that residents would still have access to local shops.											This policy is expected to have a positive impact on age, disability, and lower income groups. These groups often tend to have reduced mobility and reduced income, and would be adversely impacted if they need to travel far to reach local shops and community uses.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 46	Evening and night-time economy uses seeks to encourage uses at this time of day											has the potential to advance equality and promote social integration. This policy will encourage young people and families into the borough centres in the evenings, although it is unlikely to do the same with older people. There is some concern that some night-time economy activities could to lead to increases in anti-social behaviour, public disorder and crimes related.	Consideration need to be given to implementation issues. The development of such activity needs to be well managed to ensure that there are no differential impacts on some groups. Therefore, the need for careful management and coordination with other service areas such as licensing and policing is noted. The plan includes other policies dealing with the design of the public realm and measures to minimise opportunities for crime and antisocial behaviour.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 47	Shopfronts and signage seeks to improve the attractiveness and visual interest of all town centre areas											Improving the attractiveness and visual interest by encouraging high standards of design with regard the shopfronts. This is expected to have a positive impact on all groups.	No recommendations or change

Policies Chapter	Description 12: Social and Community Infras	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 48	Social and community infrastructure aims to preserve and enhance the borough's network of social and community infrastructure											This policy covers a wide range of se residents by helping meet their local contribute towards good quality of lieducation, community, play, youth, High quality and accessible social a including health and education proving residents' life chances. Social and the easily accessible by walking, cyclaccordance with TfL Healthy Street have a positive impact on all groups infrastructure as a result of age or of the plan contains policies to ensure (including alterations, refurbishment and changes of us of buildings) are by all to promote equality of access—see policies 6 and 56. Reprovision and redevelopment of infrastructure assets also offers oppupgrade existing facilities, which off meet, modern accessibility standard This policy therefore benefits all second	Il and strategic needs and fe. It includes health provision, recreation, sport and burial needs. and community infrastructure, rision, are the foundations of our Community infrastructure should cling and public transport in approach. This is expected to a lisability are noted. It is that new development proposals to fexisting buildings, extensions inclusively designed and usable and equality of opportunity for all existing time-expired community portunities to modernise and en do not meet, or find it difficult to ds. etions of the community.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 49	Education and childcare facilities supports the development of new education and childcare facilities across the borough to meet the needs of the growing population											This policy supports the delivery of training, including Early Years, Prim Education Needs (SEN), in identifie Council, in its role as Local Education responsibilities. This is expected to groups in the borough. The plan condevelopment proposals (including a existing buildings, extensions and coinclusively designed and usable by and equality of opportunity for all — so This policy therefore benefits all sections.	hary, Secondary and Special d areas of need ensuring the con Authority, can meet its statutory have a positive impact on all ntains policies to ensure that new literations, refurbishment of hanges of us of buildings) are all to promote equality of access see policies 6 and 56.
Chapter	13: Promoting Health and Well-B	ein	g										
Policy 50	Promote healthy communities promotes the creation of healthy and sustainable places												No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	me	Justifications Recommendations
Policy 51	Health Impact Assessments promotes healthier and inclusive environments for all											HIA would promote assessment of development impacts on all groups and provide framework for appropriate steps to be taken to promote inclusive development.
Policy 52	Making Safer Places Community safety and crime deterrence for all											Design which makes places safer through incorporating principles to reduce antisocial behaviour, crime and the fear of crime benefit primarily age, disability and LGBTQ groups
Policy 53	Noise, Vibration and Light Pollution sets out the planning criteria for the minimisation and control of noise, vibration and light pollution impacts which have the potential to adversely affect resident's health and wellbeing											Lower income groups may be more susceptible to benefits of policy control than any other as this group is more likely to be concentrated in areas where the most polluting uses are likely to be concentrated. No recommendation or change to policy

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications Recommendations
Policy 54	Hot Food Takeaways sets out planning criteria to control the overconcentration of unhealthy food outlets in order to support better health outcomes											Based on Public Health England, the proliferation of hot food takeaways generally affects young people, BAME and those on lower incomes more. By seeking to manage the proliferation of hot food takeaways, this policy should have a positive impact on these groups. No recommendations or change to policy
Policy 55	Betting Shops and Payday Loan Shops sets out restrictions for new proposals with these uses											Based on Public Health England, those on lower incomes use betting shops more. By seeking to manage the proliferation of betting shops, this policy should have a positive impact on lower income groups. No recommendations or change to policy.

Policies		Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Chapter	14: Creating High Quality Places												
Policy 56	Delivering high quality design aims to ensure that new developments are designed to a high quality											This policy seeks to ensure well designed, high-quality places that are inclusive, well connected and attractive for local people and visitors. As such, it should be of benefit to all people in the borough, and the impact on those with protected characteristics would be no greater than those experienced by the population as a whole. The exception to this are those protected due to disability, age, and pregnancy/maternity who	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 57	Taller and Tall buildings sets out the criteria against which development proposals for taller buildings will be assessed											This policy sets out locational and design criteria against which proposals for taller and tall buildings will be assessed. Well-designed tall buildings will have a positive impact on everyone in the borough, therefore the impacts on those with protected characteristics would be no greater than those experienced by the population as a whole. The exception to this is people on a lower income, for whom well-designed taller and tall buildings have a greater positive impact on, as they help optimise the use of land and increase the amount of affordable housing that can be delivered.	

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 58	Residential Space Standards											This policy sets out the standards expected of all new residential development, including internal space standards, requirements for external amenity space and requirements for play space. In general, this should benefit all residents, with no greater benefits for those with protected characteristics than the population as a while. The exception to this is those protected by age, who will benefit positively from the play space requirements.	No recommendations or change to policy.
Policy 59	Residential Amenity requires new development s to respect the amenity of existing and future occupiers neighbouring a site or in the surrounding area											Protecting the amenities of existing and future residents is of equal benefit to everyone in the borough. The impacts on those with protected characteristics would be no greater than those experienced by the population as a whole.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 60	Designing out crime aims to improve community safety and cohesion through the design of new development proposals												No recommendations or change to policy.
Policy 61	Advertisements, Hoardings and Signage sets out the design criteria against which proposals for advertisements will be considered											, ,	No recommendations or change to policy.

Policies	Description 15: Active Travel, Sustainable Tr	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 62	Promoting Sustainable Transport promotes the delivery of vibrant, habitable and active communities with the aim to increase physical and mental wellbeing benefits	ans	Po						ust	ide	- Col	The aim is to meet the Healthy Street indicators and enhance public realm, wayfinding, walking, cycling and public transport while reducing motor dominance to improve safety. More attractive and secure 20-min neighbourhoods could provide a positive contribution to wellbeing and equal benefits for all.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Ke-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 63	Active Travel encourages the continuous street improvements that enable people to build active travel into their everyday lives in a safer and healthier environment											, , ,	No recommendations or change to policy.

²¹ Transport for London (TfL) Safety & security reports. Available at: https://tfl.gov.uk/corporate/publications-and-reports/safety-and-security

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriago & civil narthorebin	Marriage & civil partnersnip	Lower income	Justifications	Recommendations
Policy 64	Public transport seeks to support, enhance and complement the existing public transport network in order to unlock and mitigate future growth and improve people's life chances												Improved public transport priority and reliability is likely to have positive impacts on users who in turn are more likely to be from the Protected Characteristic Groups (PCGs). These include women, transgender, young and older people, people with disabilities and those from different ethnic groups ²² . Data collection and monitoring of the PCGs users travel behaviour and their safety and security when using the public transport network. Supporting accessibility measures at stations will assist users with mobility impairments, older people and people with pushchairs.	No recommendations or change to policy.

²² Transport for London (TfL) (2019), Annual Diversity and Inclusion impact report 2018/19. Available at: http://content.tfl.gov.uk/tfl-annual-diversity-and-inclusion-impact-report-2018-19.pdf

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 65	Development and Transport Impacts sets out transport requirements for new developments, including the submission of key documents to assess and mitigate impacts											_	No recommendations or change to policy.
Policy 66	Deliveries freight and servicing seeks to minimise the adverse impacts of movement of goods and servicing vehicles by reducing trips and waste												No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicitv/Race	Religion/Belief	Disability	Sexual Orientation	Drogon (Materials)	riegilalicy/materillity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 67	Construction Logistic Plans (CLPs) sets out the minimum requirements for Construction Logistic Plans (CLPs) for developments mitigating road network impacts													No recommendations or change to policy.
Policy 68	Managing vehicles travel traffic maximises parking standards and promotes low-car and car-free development where appropriate												inmine mai ara vilinarania in man	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 69	Electric vehicles aims to promote electric and ultra-low-emission vehicles and provision of charging infrastructure											This will reduce air pollution and road congestion; with a considerably positive impact on vulnerable and more exposed groups such as young and older people with asthma.	No recommendations or change to policy.
Policy 70	Utilities infrastructure ensures the borough has the utility capacity and capability to meet existing and future needs											This policy covers a wide range of services and facilities that support residents by helping meet their local and strategic needs and support their daily lives. This is expected to have a positive impact on all groups in the borough.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 71	Digital infrastructure ensures residents and businesses have access to high-quality digital connectivity											The main purpose of this policy is to telecommunications capabilities in a in this infrastructure will contribute t local services, including Council and access new economic opportunities employment. While improved access to digital se on all groups in the borough, the recertain services will also benefit per digital connectivity can also help mi independence. This is likely to partiwith disabilities, pregnant women as speakers and those with more limited language. No recommendations or change to	all new developments. Investments o improving access to digital and d health services, as well as s, including skills attainment and rvices will have a positive impact duced need to travel to access ople on low incomes. Improved nimise loneliness and maximise cularly benefit older people, those and people with babies, non-native ed command of the English

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Orogonal Allocations	Pregnancy/Maternity	Marriage & civil partnership	Lower income	Justifications	Recommendations
Chapter	16: Enhancing and Preserving or	ur H	leri	taç	je								
Policy 72	Designated heritage assets ensures the preservation of listed assets											This rating applies as designated heritage assets are protected by nationally overarching policies that do have no direct impact on the impact on PCG's.	Recommend that designated Heritage Assets are reviewed regularly to assess whether they do have impact on PCG's (for example the sensitive historical links)
Policy 73	Listed buildings ensures the preservation of listed buildings											Some of the listed public buildings in the borough may not have the best access for wheelchair users. Any application on a public building that requires listed building consent for refurbishment / restoration works should consider ensuring adequate access while avoiding harm or visual impact to the historic fabric of the building.	Review applications for listed building consent are received and assessed as to whether access arrangements could be improved.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	me	Justifications	Recommendations
Policy 74	Conservation Areas designates a level of protection to an area of the borough that is of historical significance to preserve and enhance its character.											buildings and general historic character. These areas have to preserve their character, but also adapt to meet the needs of	Recommendation for enhancements (including improvements to public realm for) access around conservation areas, where applicable are explored as part of a planning application.
Policy 75	Archaeological Assets and Archaeological Priority Zones protects areas of the borough where archaeological remains may be present											nesionation of the brighty zone	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 76	Non-Designated Heritage Assets offers a level of protection to non- statutorily listed buildings in the borough.											There are many historical buildings in the borough that are not part of a Conservation Area or are either locally or statutorily listed. These buildings are usually the most at risk of insensitive repairs; property owners may lack the knowledge, skills, inclination or budget to carry out this work in a sensitive manner.	No recommendations or change to policy.
Policy 77	Locally Listed Buildings offers a level of protection to Locally Listed Buildings in the borough.											Some of the locally listed public buildings in the borough may not have the best access for wheelchair users. Applications for refurbishment or restoration work should enhanced access that is designed to avoid harm to the historical fabric of the building. Although not required locally listed buildings should be afforded the same level of care as statutorily listed buildings.	Review applications for listed building consent are received and assessed as to whether access arrangements could be improved.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 78	Highams Area of Special Character protects the area from alteration to its unique characteristics.											This policy is applied uniformly to all of the buildings within the HASC boundary.	No recommendations or change to policy.
Chapter	17: Protecting and Enhancing the	e E	nvi	ron	me	nt							
Policy 79	Green Infrastructure and the Natural Environment seeks to preserve and enhance green and blue open spaces including Green Belt and Metropolitan Open Land (MOL)											Accessible open space, including Green Belt and MOL, provide greater opportunities for healthy recreation and mental well-being across all age and income ranges. It is not considered that gender, sex, ethnicity, or religious orientation are determinants in relation to the protection or use of such land.	No change or recommendations to the policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	me	Justifications	Recommendations
Policy 80	Parks, Open Spaces Sport and Recreation aims to increase access to play, sport, recreation, parks and open space											Promotion of healthy communities by providing spaces for sports and leisure facilities to promote physical and mental well-being. Accessible open space provides greater opportunities for healthy recreation across all age and income ranges. The well-being benefits are not considered to be limited by gender/sex/ethnicity/ or religious orientation. It is not considered that there are significant negative aspects inherent in the provision of such spaces.	No recommendations or change to policy.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 81	Biodiversity and geodiversity addresses preservation and potential increase in biodiversity and retention and protection of geological features of interest												No change or recommendations to the policy

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 82	Trees addresses the issues of protection, preservation and increasing the number of trees in the borough as a component of green capital.											Trees are an important component of the urban environment; providing physical and mental health and well-being benefits. In addition they an aid improvement of water, soil and air quality and mitigate the impacts of vehicle pollution. These benefits apply across all age and income ranges. The well-being benefits are not considered to be limited by gender, sex, ethnicity, or religious orientation and some religions place particular importance on horticulture.	No recommendations or changes to policy
Policy 83	The Epping Forest and the Epping Forest Special Area of Conservation promotes cooperative wokring with partners and agencies to provide a framework for the mitigation of development impacts on the Epping Forest SAC.											The purpose of this policy is to provide a framework for the mitigation for the impacts of development upon The Epping Forest	No recommendations or changes to policy

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 84	The Lee Valley Regional Park promotes co-operative working with partners and agencies to preserve and enhance the Lee Valley Park and the Special Protection Area.											The purpose of this policy is to provide a framework for the mitigation for the impacts of development upon the Lee Valley Regional Park and its Special Protection Area (SPA)	No recommendations or changes to policy.
Policy 85	Protecting and Enhancing Waterways and River Corridors Addresses preservation and enhancement of the water environment and its biodiversity											Promotion of biodiversity and water habitat results in improvement of water, soil and air quality. It can mitigate the impacts of vehicle pollution and provide climate and quality-of-life benefits. In addition, water settings have a beneficial impact on the location of development.	The policy is intended to protect the borough's water resources for their ecological and biodiversity benefits in addition to their beneficial impact on climate change and their leisure value. As such the water environment is considered to be accessible to all and capable of providing particular benefits to those who experience respiratory conditions (which in some cases may be age-related). No change proposed.

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations	
Policy 86	Food growing and allotments seeks to preserve the existing level of allotment provision and to create the conditions for food growing individually or cooperatively in new development											Allotments and food growing promote physical health and mental well-being by providing land for growing fresh food, outdoor activity, and community gardening. Activities generally surpass language barriers, benefitting non-English-speaking groups and (depending on any allotment fees) can be a cheap way to provide food. It also has habitat and biodiversity benefits.	Food growing is considered positive for all protected characteristics for its community, ecological and health benefits. No change or recommendations to the policy	
Chapter	18: Ensuring Climate Change Re	sili	enc	е										
Policy 87	A zero carbon borough seeks to minimise greenhouse gas emissions and carbon footprint while maximising energy efficiency											Insistence on proposals having high energy efficiency in the borough will have adverse impacts on affordability to secure tenure. Although in the long-term measures can save money, developers will look to recoup costs in the short term to improve project viability.	No recommendations or change to policy.	

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	ome	Justifications	Recommendations	
Policy 88	Decentralised and renewable energy seeks to maximise the use of spaces and decentralised energy system's											ITHERE IS A STRONG NOTENTIAL FOR THE	No recommendations or change to policy.	
Policy 89	Sustainable design and construction ensures the development of sustainable delivery											IIONA TARM FIINNINA COSTS OT	No recommendations or change to policy.	
	Air pollution seeks to mitigate any adverse air pollution impacts											identified groups and offers mitigations measures to improve	No change or recommendations to the policy – applications will be reviewed on a case by-case basis.	

Policies	Description	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Lower income	Justifications	Recommendations
Policy 91	Water Quality and Water Resources seeks to mitigate any impact on the water quality or supply											This does not impact on the identified groups and offers mitigations measures to improve water quality in the borough.	No change or recommendations to the policy.
92	Contaminated land seeks to manage the development of contaminated land and contaminations											It is a requirement for all new development to address impacts of contaminated land and put mitigation measures in place.	No change or recommendations to the policy.
Policy 93	Managing flood risk sets out the criteria to minimise flood risk											This is applied across all Local Plan policies and will be implemented on applications that are in proximity to flood risk areas. It does not impact on the identified groups.	No change or recommendations to the policy.
Policy 94	Overheating seeks to avoid exacerbation of an urban heat island (UHI) effect and to improve micro-changes											This will be a consideration on all planning proposals and as such will not impact on the identified groups.	No change or recommendations to the policy.

Policies Chapter	Description 19: Promoting Sustainable Wast	Age Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/Maternity	Gender Re-assignment	Marriage & civil partnership	Justifications Recommendations
Policy 95	Waste management sets out how waste will be managed in the borough in line with the Mayor's waste hierarchy through the boroughs' participation in the North London Waste Plan (NLWP)										The policy works with adopted guidance and seeks to achieve sustainable, well-designed practices in promoting the reduction of refuse in all waste streams, and encouraging recycling and the use of sustainably sourced materials. This approach is considered positive for all protected characteristic groups.

Result of Equality Impact Assessment (EqIA) Screening

4.9. Table 4.3 shows the average result for chapter as an outcome of the Table 4.2.

Table 4.3 EqIA Chapters Summary Table

Chapters	Age	Sex / Gender	Ethnicity/Race	Religion/Belief	Disability	Sexual Orientation	Pregnancy/ Maternity	Gender Re- assignment	Marriage & civil partnership	Lower income	Average Chapters
Chapter 4: Spatial Strategy											
Chapter 5: South Waltham Forest											
Chapter 6: Central Waltham Forest											
Chapter 7: North Waltham Forest											
Chapter 8: Decent homes for everyone											
Chapter 9: Building a Resilient and Creative Economy											
Chapter 10: Promoting Culture and Creativity											
Chapter 11: Distinctive Town Centres and High Streets											
Chapter 12: Social and Community Infrastructure											
Chapter 13: Promoting Health and Well-Being											
Chapter 14: Creating High Quality Places											
Chapter 15: Sustainable Transport and Infrastructure											
Chapter 16: Enhancing and Preserving our Heritage											
Chapter 17: Protecting and Enhancing the Environment											
Chapter 18: Ensuring Climate Change Resilience											
Chapter 19: Promoting Sustainable Waste Management											
Average PCGs											

^{4.10.} The table above shows that overall the policies have a neutral or positive impact on PCGs, especially age, disability and lower-income groups, which also include members of the other groups as gender, ethnicity / race and sexual orientation.

5. Conclusions

Conclusions

- 5.1. This report has outlined the approach, evidence and findings of the EqIA for the Waltham Forest Proposed Submission Local Plan (Reg 19) (October 2020). The assessment has considered equality legislation and the Council's duty under the Equality Act 2010.
- 5.2. The assessment has been undertaken in house by reviewing the Proposed Submission Local Plan chapters and policies and identifying any potential differential or disproportionate negative or positive impacts on the groups with protected characteristics. This in order to support the delivery of new or improved social and community infrastructure to meet the needs of the borough's current population and future growth. This new version of the Plan has implemented positives changes to policies as a result of previous assessment (Reg 18).
- 5.3. The assessment has found that the Proposed Submission Local Plan does not have any disproportionate or differential negative impacts on any one group with protected characteristics (Table 4.3). Furthermore, the Plan can help to mitigate current barriers and advance equality of opportunity for specific groups using this assessment, in special attention to disable, younger and older, women, BAME, LGBTQ+ and lower income groups.
- 5.4. As the borough's population continues to increase so does the demand for housing, employment and infrastructure facilities. Particular benefits are likely to be realised through encouraging more affordable housing development and by improving transport links alongside public transport priority and reliability. Focusing mixed-use development in more accessible locations closer to facilities and services should reduce the need to travel. The Local Plan (Reg 19) will be published during COVID-19, taking into consideration current and potential impacts. The Local Plan policies encourages sustainable and active travel modes, which offers associated health benefits as well as increasing opportunities to local services and facilities, such as employment, education, healthcare and recreation.
- 5.5. This assessment has identified relevant aspects across the Local Plan policies, especially with reference to disability access, active travel, access to transport, services and affordable housing; as well as considers groups, such as LGBTQ+; and the importance of sub-prime retailing of provision of goods and services for residents on lower incomes.
- 5.6. The North of the borough presents a major concern for some PCGs as transport accessibility issues, which may lead to a sense of isolation for those less naturally mobile. Mitigations through development and work with neighbouring authorities and TfL towards improved public transport and greater connectivity will improve the impact on some PCGs and reduce exposure to road pollution.

Further EqIA activities

5.7. At the end of 5 years after the adoption of the Local Plan, the Council in conjunction with its stakeholders will undertake a comprehensive analysis of the cumulative housing, employment and infrastructure delivery to date. This will also review policies and ensure there is a positive impact on PCGs such as those with disabilities or older groups, who are more likely to require and benefit from accessible housing.