

Equality Impact Assessment (EqIA) November 2018



You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	HSDP Business Plans	Date EqIA created 10/01/24
Name and job title of completing/lead Officer	Emma Talbot, Director of Regeneration and Sustainable Development	
Directorate/ Service responsible	Housing Regeneration, Housing Services, Place Directorate	
Organisational approval		
EqIA approved by EDI Team	Name Jennifer Rock Assistant Policy Officer	Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval 12.1.24

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)

a) What is your proposal?

Following a competitive procurement process under the Public Contracts Regulations 2015, Cabinet approved at its meeting of 15 July 2021 that the Harrow Strategic Development Partnership should be established with the Council's preferred development partner Wates Residential. This was the agreed delivery vehicle for Poets Corner, Peel Road and Byron Quarter Phase 1 (the Core Sites) in the Regeneration Programme. As part of the HSDP Governance that was established in 2021, annual updates to business plans are to be provided to the Council for approval. The current proposal is to approve the update to the initial business plan "the Overarching Business Plan" and two phased business plans; one for Byron Quarter Phase 1 and one for Poets Corner.

Once the partnership with Wates Construction Limited was incorporated in August 2021 as an LLP, the Council had the opportunity to add further sites into the partnership for development and on the 18 November 2021 the Cabinet authorised the HSDP to be commissioned to carry out the demolition and redevelopment of the site at Milton Road.

The Council added the Milton Road development site on 25 March 2022. This is 100% affordable scheme, and the project is on site and will complete in December 2024. The scheme is being delivered through a community works agreement, with the Council entering a building contract with Wates Construction to build the new homes, which will be owned and managed within the Council's Housing Revenue Account. An update on this scheme is provided to Cabinet.

In November 2022, an update report on the HSDP was taken to Cabinet. The Cabinet approved the initial business plan for Grange Farm (Phase 2); approved the development of a planning application for phases 2 and 3; and gave authority to incorporate the Grange Farm Scheme into the HSDP. Due to viability constraints the documents required to incorporate the Grange Farm Scheme into the HSDP have not been completed. The report recommends restarting work on this scheme.

The business plans set out the present position on:

- Proposals for the redevelopment focussing on two of the core sites
- The pausing of Peel Road due to viability challenges and rephasing of the programme to prioritise Poets Corner along with Byron Quarter

- The opportunity for the development of 1,265 units
- Split of affordable housing
- Approaches to ways of working including a partnership charter, board arrangements and HSDP resourcing
- Social value approach and targets
- Financial models demonstrating viability, funding strategy and projected returns
- Planning strategy and design principles
- Programme
- Community Engagement
- Approach to equalities and Inclusion

b) Summarise the impact of your proposal on groups with protected characteristics

The proposed approval of the Business Plans and restarting of the Grange Farm scheme for phases 2 and 3 will enable the work to take place to develop detailed scheme proposals to progress through the planning over the next 12 months.

For Grange Farm, the original sub-standard properties, that were beyond economic repair and difficult to heat, are being replaced with brand new homes built to modern standards and high levels of energy efficiency and accessibility. This will benefit all residents on the estate, particularly in the context of cost of living concerns but may have a particularly positive impact on older people and people with disabilities. The specific impacts on protected characteristics remain as set out in the EqIA dated November 2022 for Grange Farm which has been reviewed to ensure that it remains relevant and is appended to this EqIA.

The approval of the HSDP Business Plans will mean that detailed proposals will be developed for Byron Quarter and Poets Corner. These will include a mix of private homes and flats available for sale and/or rent alongside affordable housing which will be delivered across tenures to give opportunities for low cost housing to those who cannot afford to buy or rent in the private market.

Additionally, the development of these vacant sites will benefit residents and business with access to new facilities, shops, open space and parks which will particularly benefit young people. A proportion of homes will also be accessible which will positively impact on groups with disabilities.

c) Summarise any potential negative impact(s) identified and mitigating actions

While redevelopment can be disruptive, it is not anticipated that any particular group would be negatively impacted by the approval of Business Plans to enable the progression of these sites to planning. As the schemes are developed in to detailed proposals, impacts will be kept under review and considered through that process as they become known.

2. Assessing impact													
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact											
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact								
			Minor	Major									
Age	<p>There has been an increase of 19.4% in people aged 65 years and over, an increase of 7.8% in people aged 15 to 64 years, and an increase of 7.5% in children aged under 15 years.</p> <table border="1"> <thead> <tr> <th colspan="2">Age Groups (C 2021)</th> </tr> </thead> <tbody> <tr> <td>0-17 years</td> <td>58,366</td> </tr> <tr> <td>18-64 years</td> <td>162,658</td> </tr> <tr> <td>65+ years</td> <td>40,177</td> </tr> </tbody> </table> <p>Between the last two censuses, the average (median) age of Harrow increased by two years, from 36 to 38 years of age.</p> <p>This area had a higher average (median) age than London as a whole in 2021 (35 years) but a lower average (median) age than England (40 years). The median age is the age of the person in the middle of the group, meaning that one half of the group is younger than that person and the other half is older.</p> <p>The number of people aged 35 to 49 years rose by just under 8,000 (an increase of 15.9%), while the number of residents between 20 and 24 years fell by just under</p>	Age Groups (C 2021)		0-17 years	58,366	18-64 years	162,658	65+ years	40,177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Age Groups (C 2021)													
0-17 years	58,366												
18-64 years	162,658												
65+ years	40,177												

	<p>950 (5.8% decrease).</p> <p><u>Impact</u></p> <p>It is anticipated that all ages groups will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from new amenities, open space and parks.</p>				
<p>Disability</p>	<p>In 2021, 5.9% of Harrow residents were identified as being disabled and limited a lot. This figure decreased from 8.2% in 2011. These are age-standardised proportions.</p> <p>In 2021, 7.3% of Harrow residents were identified as being disabled and limited a little. This makes for 13.2% of Harrow residents being disabled, a decrease from 17.5% in 2011.</p> <p>Census 2021 was undertaken during the coronavirus (COVID-19) pandemic. This may have influenced how people perceived their health status and activity limitations, and therefore may have affected how people chose to respond.</p> <p><u>Impact</u></p> <p>It is anticipated that those with disabilities will benefit from new modern homes, built to good accessibility standards, as well as from the new amenities on the estate which would be accessible to all.</p> <p>A proportion of the homes will be delivered to a wheelchair accessible standard in accordance with current planning policy.</p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>

<p>Gender reassignment</p>	<p>- 90.12% of Harrow residents described themselves as having the same gender identity as sex registered at birth (<i>188,901 respondents</i>)</p> <p>- 0.53% of Harrow residents described themselves as having a gender identity which differs to the sex registered at birth, but gave no specific identity (<i>1,108 respondents</i>)</p> <p>- 0.15% of Harrow residents described themselves as a Trans woman (<i>318 respondents</i>)</p> <p>- 0.16 of Harrow residents described themselves as a trans man (<i>342 respondents</i>)</p> <p>- 0.03% of Harrow residents described themselves as non binary (<i>57 respondents</i>)</p> <p>- 0.03% of Harrow residents described themselves as 'All other gender identities' (<i>59 respondents</i>)</p> <p>-8.98% of Harrow residents did not respond (<i>18,832 respondents</i>)</p> <p><u>Impact</u></p> <p>It is not anticipated that there will be a negative impact related to this specific protected characteristic. It is anticipated that this group will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities, open space and parks.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Marriage and Civil Partnership</p>	<p>The increase in the percentage of people aged 16 years and over who had never been married or in a civil partnership was greater across England (3.3 percentage points) than in Harrow (1.0 percentage points).</p> <p>In Harrow, the percentage of adults who had never been married or in a civil partnership increased from 32.3% in 2011 to 33.2% in 2021. During the same period, the percentage across England increased from 34.6% to 37.9%.</p> <p>The percentage of adults who were married or in a civil partnership in Harrow increased from 53.8% to 53.9%, while the percentage of adults who had divorced or dissolved a civil partnership increased from 5.4% to 5.7%.</p> <p>These figures include same-sex marriages and opposite-sex civil partnerships in 2021, neither of which were legally recognised in England and Wales in 2011. Same-sex</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>marriages have been legally recognised in England and Wales since 2014 and opposite-sex civil partnerships have been recognised since 2019.</p> <p>The percentage of adults who had never married or registered a civil partnership in Harrow increased by 1.0 percentage points.</p> <p><u>Impact</u></p> <p>It is not anticipated that there will be a negative impact related to this specific protected characteristic. It is anticipated that this group will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities, open space and parks.</p>				
<p>Pregnancy and Maternity</p>	<p>ONS births figures show Harrow as having 3,312 live births in 2021. 14 live births per 1000 population is higher than the England & Wales average of 10.8</p> <p>The borough has a higher-than-average infant mortality rate in London, at a rate of 3.9 deaths per 1000 live births, which is an indicator of poverty and inequality in the borough.</p> <p><u>Impact</u></p> <p>It is not anticipated that there will be any negative impact related to this specific protected characteristic. It is anticipated that this group will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities, open space and parks.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Race/ Ethnicity</p>	<p>In 2021, 7.2% of Harrow residents identified their ethnic group within the "Other" category ("Arab" or "Any other ethnic group"), up from 2.9% in 2011. The 4.3 percentage-point change was the largest increase among high-level ethnic groups in this area.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Across London, the percentage of people from the "Other ethnic groups" ("Arab" or "Any other ethnic group") increased from 3.4% to 6.3%, while across England the percentage increased from 1.0% to 2.2%.

In 2021, 45.2% of people in Harrow identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 42.6% in 2011), while 36.5% identified their ethnic group within the "White" category (compared with 42.2% the previous decade).

The percentage of people who identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category decreased from 8.2% in 2011 to 7.3% in 2021.

There are many factors that may be contributing to the changing ethnic composition of England and Wales, such as differing patterns of ageing, fertility, mortality, and migration. Changes may also be caused by differences in the way individuals chose to self-identify between censuses.

The race/ethnicity statistics from the 2021 Census for Harrow for those who responded to the question was as follows:

Asian, Asian British or Asian Welsh	118,152 (45.2%)
Black, Black British, Black Welsh, Caribbean or African	19,151 (7.3%)
Mixed or multiple ethnic groups	9,833 (3.8%)
White	95,233 (36.5%)
Other ethnic groups	18,836 (7.2%)

Impact

It is not anticipated that there will be a negative impact related to this specific protected characteristic. It is anticipated that this group will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities, open space and parks.

Religion or belief	Christian	88,602 (33.9%)				
	Buddhist	2,812 (1.1%)				
	Hindu	67,392 (25.8%)				
	Jewish	7,304 (2.8%)				
	Muslim	41,503 (15.9%)				
	Sikh	2,743 (1.1%)				
	Other religion	7,695 (2.9%)				
	No religion	27,748 (10.6%)				
	Not answered	15,404 (5.9%)				
	<p>In 2021, 15.9% of Harrow residents described themselves as Muslim, up from 12.5% in 2011. The rise of 3.4 percentage points was the largest increase of all broad religious groups in Harrow. Because the census question about religious affiliation is voluntary and has varying response rates, caution is needed when comparing figures between different areas or between censuses.</p> <p>Across London, the percentage of residents who described themselves as Muslim increased from 12.6% to 15.0%, while across England the percentage increased from 5.0% to 6.7%.</p> <p>In 2021, 33.9% of people in Harrow described themselves as Christian (down from 37.3%), while 25.8% described themselves as Hindu (up from 25.3% the decade before).</p> <p>There are many factors that can cause changes to the religious profile of an area, such as a changing age structure or residents relocating for work or education. Changes may also be caused by differences in the way individuals chose to self-identify between censuses. Religious affiliation is the religion with which someone connects or identifies, rather than their beliefs or religious practice.</p> <p>In 2021, 15.9% of usual residents in Harrow described themselves as Muslim</p>			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p><u>Impact</u></p> <p>It is not anticipated that there will be any negative impact related to this specific protected characteristic. It is anticipated that this group will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities, open space and parks.</p>												
Sex	<p>According to the 2021 Census 50.7% of Harrow's population was female and 49.3% were male.</p> <p><u>Impact</u></p> <p>It is not anticipated that there will be any negative impact related to this specific protected characteristic. It is anticipated that all groups within this protected characteristic will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities, open space and parks.</p>	☒	☐	☐	☐								
Sexual Orientation	<p>The 2021 Census shows that 4.27 % of Londoners identify as LGBTQIA+, the highest of any UK region¹. 1.65% of Harrow residents identify as LGBTQIA+, this is approx. 4k people².</p> <p>This is reflected in more detail in the table below</p> <table border="1" data-bbox="443 1114 1585 1281"> <tr> <td>Straight or Heterosexual</td> <td>182,702 (87.2%)</td> </tr> <tr> <td>Gay or Lesbian</td> <td>1,361 (0.6%)</td> </tr> <tr> <td>Bisexual</td> <td>1,873 (0.9%)</td> </tr> <tr> <td>Pansexual</td> <td>787 (0.4%)</td> </tr> </table>	Straight or Heterosexual	182,702 (87.2%)	Gay or Lesbian	1,361 (0.6%)	Bisexual	1,873 (0.9%)	Pansexual	787 (0.4%)	☒	☐	☐	☐
Straight or Heterosexual	182,702 (87.2%)												
Gay or Lesbian	1,361 (0.6%)												
Bisexual	1,873 (0.9%)												
Pansexual	787 (0.4%)												

¹ Source: 2021 Census

² Source: 2021 Census

Asexual	59 (0.0%)
Queer	22 (0.0%)
All other sexual orientations	137 (0.1%)
Not answered	22,680 (10.8%)

Impact

It is not anticipated that there will be any negative impact related to this specific protected characteristic. It is anticipated that all groups within this protected characteristic will benefit from the new modern homes, built to good accessibility and energy efficiency standards, as well as from the new amenities, open space and parks.

2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?

Yes No

This approval will facilitate the provision of new housing that will include affordable and accessible homes as well as access to open space and new parks which has a positive impact on life chances, health and wellbeing. This is a positive outcome in the context of pressures on adult social care and the health service.

2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc.), could your proposals have an impact on individuals/service users, or other groups?

Yes No

In view of the current concerns about the cost of living, new homes that are built to a high energy efficiency standard will have a positive impact on all groups.

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer

4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

The Harrow Strategic Development Partnership has been formed to deliver the Council's regeneration ambitions. These objectives, particularly in terms of the acceleration of the pace of housing delivery are specifically targeted at creating benefit for all of Harrow's diverse communities and maximise benefits to Harrow residents. Modern housing, new open space, parks and amenities will support equality of opportunity and better outcomes for future residents as well as the wider community. The approval of Business Plans will enable detailed proposals to be developed to deliver positive outcomes for the community. As these develop, specific impacts and mitigations can and will be identified. In addition, restarting the work to progress Grange Farm Phases 2 and 3 will enable good quality housing to to serve the existing diverse resident community and deliver their vision for the new community which continues to be open and inclusive to all.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

No change required: the EqlA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed

Outcome 2

Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4

Outcome 3

This EqlA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.

Include details here