

# HARINGEY COUNCIL

## EQUALITY IMPACT ASSESSMENT FORM



Service:.....Planning & Regeneration

Directorate:.....Urban Environment

Title of Proposal: .....South Tottenham House Extensions -  
Supplementary Planning Document

Lead Officer (author of the proposal):....Richard Truscott

Names of other Officers involved: .....Marc Dorfman  
Ismail Mohammed  
Paul Smith  
Mortimer MacSweeney

### Step 1 - Identify the aims of the policy, service or function

*State what effects the proposal is intended to achieve and who will benefit from it.*

Haringey Council wants to recognise the need to relieve over crowding, and to provide for additional habitable accommodation for large families in part of South Tottenham. The housing stock and urban form of this area is characterised by relatively small two story houses, originally with two or three bedrooms, in short or long terraces, typically with shallow pitched roofs, lining a network of roads laid out to a grid pattern, with back to back rear gardens. These would provide good homes for small families, but it is apparent that there is a greater need for larger family houses; revealed by housing need surveys and representations from community groups, particularly the established Charedi Jewish Community in South Tottenham. Many, possibly most of the occupants are owner occupiers and are keen to carry out piecemeal improvements to their own homes to address these shortcomings, but planning policy restricts what they can do. Also the area's relatively central location means land values are greater than the existing building stock; recent developments nearby are all of higher density.

The Council's former UDP(1998) included a policy, DES 5.7, on Dormer Windows, Roof Extensions and Loft Conversions, which gave special consideration to the circumstances of the Charedi Jewish Community, which has a particular need for accommodation for large families. This policy was not carried forward into the 2006 UDP, at which time the Council applied a policy approach which considered extension proposals in South Tottenham exactly the same basis as extension proposals elsewhere in Haringey, consistent with Policy UD3 and SPG1a. The Council drafted informal planning guidance in 2007, setting out where extensions may be acceptable; this did not undergo a consultation procedure and was not adopted, but has been used for development control purposes and many roof extensions in the area have been permitted on this basis. The council now does not find this guidance good or acceptable.

There is a pressing case for new adopted Planning Guidance to regularise roof extensions in the area, and ensure both adequate growing space and good design. The Design Guidance sets out design principles for house extension that will respect the character of the residential neighbourhood in the South Tottenham area of the Borough where there is urgent need to address issues of house extension. Three model types of extension are considered good and well designed models for future roof extensions in the area, allowing a transition from two storey to three storey streets, with consistent scale and character, to a good standard of design, accommodating appropriate growth.

By restricting roof extensions to just three permissible types, the proposed policy will protect the visual coherence, elegance and residential character of the area whilst allowing for some domestic extensions. This protects the amenity of neighbouring residents particularly, but also of visitors to the area, so the proposed policy provides some small benefit to a wide part of the population, and more significant benefits to all the residents of the area. This may well encourage greater respect for street tidiness generally. However, the most significant benefits will accrue to homeowners with large families, who will be able to get planning permission for significant extensions to their homes, sufficient to accommodate larger families to decent housing standards.

Reduction of overcrowding, especially in family housing, is widely recognised to produce significant secondary social benefits. Children perform significantly better at school if they have space of their own sufficient to do homework undisturbed, are healthier and have better development if they do not have to share their bedrooms and will potentially allow greater independence for older children in large families. Families can often more easily support elderly or disabled relatives if they have space to provide living accommodation together; house extensions could be used to allow conversion of ground floor living rooms to accommodation for the mobility impaired with replacement living accommodation at an upper story, to better accommodate cared for dependants and carers.

The two models of permitted extensions that provide the most additional accommodation would also require some or significant structural and building alterations, sufficient to require Building Control approval. This is an inevitable side-effect but also provides opportunities for improvements to existing building fabric, by encouraging safe and sustainable buildings through modern construction techniques. All new construction and parts of the existing buildings will need to be to a significantly higher standard of insulation and general construction, as required by the Building Regulations, benefiting the environment. Permitting roof extensions where otherwise householders are tempted to extend into their gardens protects amenity space, the natural environment and potential for domestic food production, by reducing pressure for loss of gardens. Also permissions for proposals in accordance with the guidance would potentially be granted more swiftly with less use of staff resources.

## Step 2 - Consideration of available data, research and information

You should gather all relevant quantitative and qualitative data that will help you assess whether at presently, there are differential outcomes for the different equalities target groups – diverse ethnic groups, women, men, older people, young people, disabled people, gay men, lesbians and transgender people and faith groups. Identify where there are gaps in data and say how you plug these gaps.

In order to establish whether a group is experiencing disproportionate effects, you should relate the data for each group to its population size. The 2001 Haringey Census data has an equalities profile of the borough and will help you to make comparisons against population sizes.

[http://harinet.haringey.gov.uk/index/news\\_and\\_events/fact\\_file/statistics/census\\_statistics.htm](http://harinet.haringey.gov.uk/index/news_and_events/fact_file/statistics/census_statistics.htm)

*2 a) Using data from equalities monitoring, recent surveys, research, consultation etc. are there group(s) in the community who:*

- *are significantly under/over represented in the use of the service, when compared to their population size?*
- *have raised concerns about access to services or quality of services?*
- *appear to be receiving differential outcomes in comparison to other groups?*

*2 b) What factors (barriers) might account for this under/over representation?*

Consultation with the local community and with groups representing the Charedi Jewish and other communities has revealed a frustration that homeowners in the area feel at the increased difficulty experienced in obtaining planning permission for significant house extensions compared to the situation under the previous 1998 UDP. However, this merely arises from a consistent application of the same planning policies across the borough.

Demographic data reveals very little of significance, because it is only available at the ward level (in the Seven Sisters Ward Profile). “South Tottenham” comprises only approximately the eastern most third of Seven Sisters ward. There is good reason to believe that the particular South Tottenham area has significant differences in demographics to western parts of the ward, which are hidden in the data. However the census data does reveal Seven Sisters ward has:

- 4.1% more overcrowding than average,
- marginally the largest average household size (2.6 compared to 2.3 across the borough),
- the third highest proportion (26.3%) of households with more household members than rooms (a useful measure of overcrowding),
- the most significant concentration of members of the Jewish faith in the borough (7.6% above average), and
- the third most households with dependant children (after Muswell Hill and Alexandra wards at the opposite geographical location).

The need for more housing for larger families across Haringey is recognised by our Housing SPD (adopted October 2008), which notes in clause 7.3 that for private market housing, “there is evidence of an increasing poor match between the need for larger dwellings and the development of smaller units”, and for affordable housing (clause 7.4) “the housing needs survey . . . identifies that the requirement is most acute for three and four bedroom properties.”

The policies of the Housing SPD were supported by the 2004 London Housing Capacity Study. A new Strategic Housing Land Availability Assessment and Housing Capacity Study 2009 has just been released. However these do not contribute to assessment of *housing need*. The Housing SPD was also supported by a separate Housing Needs Assessment carried out in 2006 and published in 2007. At 195 pages it contains a lot of data which may be of use.

Pending a more thorough study of the evidence, we feel the anecdotal and indistinct statistical evidence supports the assertion that the “South Tottenham” area contains a particular concentration of overcrowding in the form of large families in sub-standard but owner occupied freestanding (albeit terraced) houses. It is likely that quite a lot of the overcrowding in other areas of the borough is of single people and small families in shared accommodation, rented flats and bedsits. Although this is also a serious concern, there also exists in South Tottenham an opportunity to address some of the problem of overcrowding of large families by implementing the policies contained in this Guidance.

The nature of the identified need can not really be described as an over or under representation in the use of the service (i.e. Planning), so much as in the policies used and how they impact on underlying socio-economic inequalities, namely overcrowding. It is therefore not possible to talk about this in terms of barriers that might account for any over or under representation. The under representation identified is of housing supply and particularly of family sized housing. But the council’s Housing Service is not identified as playing any part in contributing to the problem or the solutions. The problem is one of the housing market supply, as impacted by, amongst other factors outside the Council’s control, Planning Policies and Planning Development Management decisions in the light of those policies.

### Step 3 - Assessment of Impact

Using the information you have gathered and analysed in step 2, you should assess whether and how the proposal you are putting forward will affect existing barriers and what actions you will take to address any potential negative effects.

*3 a) How will your proposal affect existing barriers? (Please tick below as appropriate)*

Increase barriers?	Reduce barriers? ✓	No change?
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#### Comment

The proposal will provide ways for demand for larger house sizes to be met without contravening planning regulations. It will not remove the requirements of Planning from properties in the area, but will provide guidance towards design solutions for residential extensions. Provided all other planning guidance is satisfactorily complied with, it should be possible for householders to obtain planning permission for residential extensions in the affected area, extensions that would not normally be approved (except in exceptional circumstances) in other areas.

There is therefore a partial reduction in the barriers represented by the requirements of planning, in the defined areas. No additional planning requirements are imposed. Those unable to take advantage of the policy, whether for not having the same sort of property or not being in the defined area, do not face any additional barriers. It is not considered that the problem identified, that of overcrowding of large families, is particularly serious in other parts of the borough. It is also considered that other areas of the borough do not necessarily have the same sorts of property that could automatically have the same policy applied to them.

*3 b) What specific actions are you proposing in order to respond to the existing barriers and imbalances you have identified in Step 2?*

The proposals have been brought forward specifically to respond to the barrier identified in Step 2, the overcrowding experienced by larger families in the South Tottenham area.

*3 c) If there are barriers that cannot be removed, what groups will be most affected and what Positive Actions are you proposing in order to reduce the adverse impact on those groups?*

Not applicable.

## Step 4 - Consult on the proposal

Consultation is an essential part of impact assessment. If there has been recent consultation which has highlighted the issues you have identified in Steps 2 and 3, use it to inform your assessment. If there has been no consultation relating to the issues, then you may have to carry out consultation to assist your assessment.

Make sure you reach all those who are likely to be affected by the proposal, ensuring that you cover all the equalities strands. Do not forget to give feedback to the people you have consulted, stating how you have responded to the issues and concerns they have raised.

### *4 a) Who have you consulted on your proposal and what were the main issues and concerns from the consultation?*

These matters were discussed with local residents and local Ward Councillors at a public meeting in May 2009, followed by a meeting with designated leaders of some local communities in June to agree the design principles for house extension. Draft illustrations of various forms of roof extensions were tabled for discussion purposes and the three types were approved.

These proposals will be issued as a draft for consultation to all local residents and to relevant councillors, community groups, other Haringey services and bordering local authorities. These will be posted out on 16<sup>th</sup> November (next Monday), formally as 2 weeks consultation, but with responses able to be returned up to 14<sup>th</sup> December (4 weeks later). A reply form has been designed with drawings showing the 3 types and space for comments. A translation page will give explanation and how to obtain a translated version in the six most common community languages. A website version will also be available with web based consultation reply procedure.

Following assessment of the responses to this consultation, and incorporating the conclusions of this Equalities Impact Assessment, the guidance will be revised into the format of a Supplementary Planning Document, before issuing for formal, statutory, six weeks consultation in the early New Year.

### *4 b) How, in your proposal have you responded to the issues and concerns from consultation?*

To be decided.

### *4 c) How have you informed the public and the people you consulted about the results of the consultation and what actions you are proposing in order to address the concerns raised?*

The results of the responses to this consultation will be incorporated into the revised guidance when it is put into the format of a Supplementary Planning Document, before issuing for formal, statutory, six weeks consultation. All those residents who respond to the initial consultation, plus all the representatives and groups included in the initial consultation and all other statutory consultees will be included in the formal statutory consultation.

## Step 5 - Addressing Training

The issues you have identified during the assessment and consultation may be new to you or your staff, which means you will need to raise awareness of them among your staff, which may even training. You should identify those issues and plan how and when you will raise them with your staff.

*Do you envisage the need to train staff or raise awareness of the issues arising from any aspects of your proposal and as a result of the impact assessment, and if so, what plans have you made?*

Relevant Development Management and Planning Enforcement Officers will need to be appraised of the new policy when adopted. Under the current timetable, formal adoption is not anticipated until the second or third quarter of next year so no firm plans have been made yet. However it is not anticipated that it will need to be very complicated or intense; it should be possible to incorporate it into a short section of the usual regular timetabled team meetings. Only one of the two current area based Development Management teams will be affected by this policy.

## Step 6 - Monitoring Arrangements

If the proposal is adopted there is a legal duty to monitor and publish its actual effects on people. Monitoring should cover all the six equality strands. The purpose of equalities monitoring is to see how the policy is working in practice and to identify if and where it is producing disproportionate adverse effects and to take steps to address the effects. You should use the Council's equal opportunities monitoring form which can be downloaded from Harinet. Generally, equalities monitoring data should be gathered, analysed and report quarterly, in the first instance to your DMT and then to the Equalities Team.

*What arrangements do you have or will put in place to monitor, report, publish and disseminate information on how your proposal is working and whether or not it is producing the intended equalities outcomes?*

Following adoption, the proposed Supplementary Planning Document will be included with other planning policies in the monitoring exercise carried out leading to the Annual Monitoring Report (AMR). This is prepared and submitted towards the end of every year, approved by the Government Office for London and published on our website and on paper for those who require.

- *Who will be responsible for monitoring?*

The Planning Policy Team include officers responsible for the Annual Monitoring Report.

- *What indicators and targets will be used to monitor and evaluate the effectiveness of the policy/service/function and its equalities impact?*

It is yet to be decided what performance indicators will be used, but they are likely to include:

- number of planning applications received, approved, refused and appealed on incorporating proposals designed in accordance with the guidance,
- number of planning applications contrary to the guidance received, approved, refused and appealed on where the guidance could have been followed,
- any evidence of influence of the guidelines on proposals and planning decisions elsewhere in the borough.

- *Are there monitoring procedures already in place which will generate this information?*

We will follow the established procedures used for the Annual Monitoring Report.

- *Where will this information be reported and how often?*

the Annual Monitoring Report is published on our website and available on paper for those who require.



## Step 7 - Summarise impacts identified

In the table below, summarise for each diversity strand the impacts you have identified in your assessment

Age	Disability	Ethnicity	Gender	Religion or Belief	Sexual Orientation
<ul style="list-style-type: none"> <li>opportunities for elderly relatives to move in with their families or remain within their existing family home with new more suitable accommodation as part of domestic extensions.</li> </ul>	<ul style="list-style-type: none"> <li>opportunities for disabled relatives to move in with their families or remain within their existing family home with new more suitable accommodation as part of domestic extensions.</li> </ul>	<ul style="list-style-type: none"> <li>none identified as yet; but if evidence of ethnic bias in large family overcrowding emerges in detailed studies, then will be a positive contribution.</li> </ul>	<ul style="list-style-type: none"> <li>none.</li> </ul>	<ul style="list-style-type: none"> <li>none firmly identified as yet; but if evidence of possible Charedi Jewish over representation in large family overcrowding definitively emerges in detailed studies, then will be a positive contribution.</li> </ul>	<ul style="list-style-type: none"> <li>none.</li> </ul>

## Step 8 - Summarise the actions to be implemented

Please list below any recommendations for action that you plan to take as a result of this impact assessment.

Issue	Action required	Lead person	Timescale	Resource implications

**Step 9 - Publication and sign off**

*There is a legal duty to publish the results of impact assessments. The reason is not simply to comply with the law but also to make the whole process and its outcome transparent and have a wider community ownership. You should summarise the results of the assessment and intended actions and publish them. You should consider in what formats you will publish in order to ensure that you reach all sections of the community.*

*When and where do you intend to publish the results of your assessment, and in what formats?*

A website is being prepared to hold all the documents forming part of this application. The completed Equalities Impact Assessment will be included amongst the documents available to download there. It will also be cited as a reminder to people that it is available to consult when we send out the version of the Guidance for the second, formal, statutory consultation.

**Assessed by (Author of the proposal):**

Name: .....Richard Truscott

Designation:.....Urban Design Officer

Signature: .....*Richard Truscott* .....

Date:.....Monday, 07 December 2009

**Quality checked by (Equality Team):**

Name: Christine A Joseph

Designation: Equalities and diversity officer

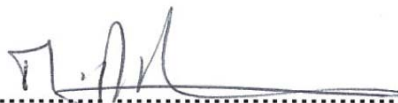
Signature: .....*Christine A Joseph*.....

Date:.....23 November 2009.

**Sign off by Directorate Management Team:**

Name: .....Marc Dorfman

Designation:.....Assistant Director, Planning and Regeneration

Signature: ..... .....

Date:.....Thursday, 03 December 2009