Old Oak and Park Royal Development Corporation

Equalities Impact Assessment

Draft Revised Statement of Community Involvement (SCI)

October 2019

1. Aims and objectives of strategy

The Old Oak and Park Royal Development Corporation (OPDC) was established on 1st April 2015 as London's second Mayoral Development Corporation and the Mayor's fifth functional body. OPDC is the statutory Local Planning Authority for the area, but also has responsibilities for coordinating delivery and ensuring that the wider area benefits from regeneration.

The Statement of Community Involvement (SCI) explains how OPDC involves the community in deciding planning applications and preparing planning policy and sets out how it will effectively access the rich wealth of knowledge that the existing communities have, in and around the OPDC area. The SCI is a statutory planning document, and its production is a requirement for all local planning authorities under the Planning and Compulsory Purchase Act (2004).

Community refers to residents, businesses, community and interest groups, neighbourhood planning forums, landowners, developers, London Boroughs within and neighbouring the OPDC area, government agencies and any other individuals, groups and organisations interested in, and affected by, the development and use of land at Old Oak and Park Royal.

The SCI was first adopted by OPDC in 2015 and updated in 2017. As a change to exiting policy, it is considered that the draft revised SCI triggers the requirement for an Equalities Impact Assessment as required under the Public Sector Equality Duty. As no assessment was carried out on earlier versions of the SCI, this assessment covers the revised SCI as a whole rather than just the proposed revisions from the previous version of the document.

2. Expected outcomes

The SCI sets out a series of expected outcomes for successful implementation of the document:

- Key community priorities are appropriately reflected in OPDC's planning policy documents.
- There is strong community awareness of different planning policy documents, including neighbourhood plans, and the crucial role they play in guiding the regeneration of the OPDC area.
- Community issues are raised at early stages in the production of planning policy documents where they can be effectively addressed.
- There is transparency and clarity for all parties on how issues raised through the consultation process have been considered by OPDC.
- Community involvement in the development management process should result in successful planning applications which address community priorities and help deliver regeneration of Old Oak and Park Royal.

- The community are aware of proposals for major developments before these are formally submitted as planning applications, and are afforded opportunities to comment on proposals and suggest changes.
- Community concerns are clearly highlighted and considered in the decision making process by OPDC officers and OPDC Planning Committee.

3. Groups with protected characteristics the Strategy is intended to benefit

The SCI aims to ensure all members of community are better engaged in the planning process. It is therefore intended that all groups with protected characteristics will benefit from the implementation of the SCI.

4. Evidence used to inform the Assessment

OPDC has prepared a <u>Socio Economic Baseline Study</u> in 2015 which provides a baseline of socio-economic and demographic indicators against which to measure the impacts of the Old Oak and Park Royal regeneration project over time. The study provides evidence on the demographic make up of the OPDC area and wider OPDC region for some of the protected characteristics, including race, age and disability.

51% of wider OPDC region are from Black, Asian and Minority Ethnic (BAME) communities, which is 11% higher than the average across London.

The population of the OPDC Area is generally younger than the overall London population, with younger people comprising a noticeably bigger share of the usual residents, offset primarily by a lower share of people aged 60 years or older.

The health of the community in the OPDC region is below London average levels, with high rates of disability, long-term health problems and childhood obesity, alongside lower than average life expectancy.

5. Analysis of Impact on Groups with Protected Characteristics

Protected Characteristic	Impact	Justification
Age	Positive	Research indicates that that those aged 65 plus are less likely to be IT literate or have access to social media or email. The SCI's commitment to postal notifications, leaflet drops and newspaper adverts, helps to ensure groups who are less likely to have access to online communications are involved in the planning process.
		The SCI commits OPDC and those submitting planning applications to hold local consultation / information events in accessible premises in the local area. This will help to ensure that events are accessible to elderly people with potential mobility difficulties.
		The SCI's commitment to using social media platforms and other online formats to promote community involvement in the planning process will help to ensure better access to younger age groups, which evidence suggests are less likely to engage in planning matters.
Disability	Positive	The SCI commits OPDC to using a variety of methods to engage with the all sections of the community. This includes making use of social media or other online engagement platforms, e-bulletins and community newsletters, as well traditional approaches such as placing adverts in local newspapers and posting letters and leaflets to individual households in the local community. This approach, in particular the use of digital platforms, will provide opportunities for involvement for those with disabilities.
		The SCI commits to hosting local consultation / information events in accessible premises in the local area. This will help to ensure that events are accessible to those with physical disabilities.
Gender reassignment	No Impact	The SCI is inclusive of all gender groups, and it is not considered that the strategy will have a disproportionate impact on any particular gender group, including the transgender community.

Protected Characteristic	Impact	Justification
Pregnancy and maternity	Positive	Women who are heavily pregnant may have particular difficulty in attending certain engagement events, as may single parents or parents of young children. The SCI's commitment to utilising a variety of engagement platforms will have a positive impact by providing more opportunities to gather information and provide comments on planning policy documents or development proposals. The SCI commits OPDC and those submitting planning applications to hold local consultation / information events in accessible premises in the local area. This will help to ensure that events are accessible to those that are pregnant of who have very young children and require access with a pram/buggy.
Race	Positive	OPDC's Socio Economic Baseline Study identifies that 51% of wider OPDC region are from Black, Asian and Minority Ethnic (BAME) communities, which is 11% higher than the average across London. It is recognised that there can be challenges in engaging all minority groups due to language barriers or other cultural differences. To help address this, Principle 2 of the SCI recognises that it may be necessary to undertake additional activities to cater for difficult to engage groups.
Religion or belief	Negative	The SCI is inclusive of all religions and belief groups, and it is not considered that the strategy will have a disproportionate impact on any particular religion or belief group. There is the potential for negative impacts on some groups with regards to consultation events, where these events may be held in venues affiliated to specific religious organisations, or where events may clash with religious feast days. To address this potential negative impact, the SCI should require that OPDC and applicants for planning permission, where feasible, use best endeavours to make use of venues which are not affiliated to a specific religion and thus remove any potential impediment to those from other religions of belief groups. Dates and times for consultation events should also consider dates of importance to specific religions.

Protected Characteristic	Impact	Justification
Sex	No Impact	The SCI is inclusive of all gender groups, and it is not considered that the strategy will have a disproportionate impact on particular gender group.
Sexual orientation	No Impact	The SCI is inclusive of all groups regardless of sexual orientation, and it is not considered the strategy will have a disproportionate impact on LGBTQ+ communities.
Marriage or civil partnership	No Impact	It is not considered that the SCI has a disproportionate impact on individual of any specific marital status.

6. Mitigation for negative impacts identified

Religion or beliefs: To address potential negative impact on groups with this protected characteristic, the SCI should require that OPDC and applicants for planning permission, where feasible, use best endeavours to make use of venues which are not affiliated to a specific religion. It should also require that dates and times for consultation events consider dates of importance for particular religions.

No other negative impacts have been identified.

7. Duty to eliminate discrimination

The SCI aims to improve community involvement in the planning process from all sector of the community. By enabling involvement by all sectors of the community in the planning process, this ensures they can directly influence the how their local area develops with the result that regeneration of the area removes barriers for all sectors of the community.

8. Advancing equality of opportunity

The draft revised SCI promotes a variety of communication methods and platforms in order to reach out to different groups. This approach ensures an equality of opportunity to partake in the planning process. The ability to influence the planning process enables communities to influence regeneration of the local area, and the opportunities that will be created as a result of this.

9. Fostering good relations

The SCI helps to foster good relations by ensuring that OPDC is open about how it will engage with the community in the delivery of its planning function, thus removing barriers to participation in the planning process.

In the preparation of planning policy and planning applications, the SCI requires public consultation events, drop in sessions or information sessions to be held in the local area. Events such as these further promote good relations across different groups and help to reduce barriers.

In addition to the SCI, OPDC has also produced an Engagement Strategy. While the SCI relates to OPDC's role as local planning authorithy, the Engagement Strategy relates to OPDC's broader role and responsibilities as development corporation, including a potential delivery agent. The Engagement Strategy contains more detail on how OPDC will engage different group on wider regeneration of the area, including strategies for fostering good relationship within the local community.

10. Action Planning

The assessment has identified no negative impacts resulting from the SCI. No further action is required.

11. Review and Monitoring

Section 4 of the SCI (Assessment and Monitoring) sets out how OPDC will assess the effectiveness of the SCI. This will be carried out through the analysis of feedback to consultation on policy and applications requested via feedback forms or other methods which make it easy and guick for participants to give feedback.

The SCI will be reviewed and regularly updated to reflect any changes required as identified through this monitoring as well as through any changes to national legislation. To support this, OPDC will undertake a review of the SCI every two years. Where material changes are made, the SCI will be re-consulted on an Equalities Impact Assessment will be undertaken on the revised document.