



**WATFORD  
BOROUGH  
COUNCIL**

# Equality Impact Analysis

<b>Title of policy, function or service</b>	Statement of Community Involvement (2019)
<b>Lead officer</b>	Vicky Hughes
<b>Person completing the EIA</b>	Vicky Hughes
<b>Type of policy, function or service:</b>	Existing (reviewed) <input type="checkbox"/> New/Proposed <input checked="" type="checkbox"/>
<b>Version &amp; Date</b>	21 October 2019  V2

## 1. Background

Every local planning authority is required to prepare and a Statement of Community Involvement (SCI) under Section 18 of the [Planning and Compulsory Purchase Act 2004](#)<sup>1</sup>, as amended.

The Statement of Community Involvement for Watford sets out out how the council will involve its residents, communities, local businesses and other stakeholders in the planning process. It will guide our approach to stakeholder engagement on the Local Plan and other planning policy documents, neighbourhood plans and Development Management decisions.

Watford's first Statement of Community Involvement was adopted in 2006 and has, subsequently, been revised. This document is the fourth revision of the SCI and has been updated to reflect changes in the ways we consult with our communities, including greater use of online technology and social media. It also takes into account changes to national legislation.

### **Public Sector Equality Duty**

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Statement of Community Involvement:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

## 2. Focus of the Equality Impact Analysis

This EIA, therefore, considers the potential equality related impacts, both positive and negative of the Statement of Community Involvement (2019) on the people in the groups or with the characteristics protected in the Equalities Act 2010.

These are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation

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<sup>1</sup> <https://www.legislation.gov.uk/ukpga/2004/5/contents>

## 9. Marriage and Civil Partnership.

### 3. Engagement and consultation

Public consultation on the Draft Statement of Community Involvement took place from Friday 19 July to Friday 13 September 2019. The consultation ran for eight weeks instead of six to account for the summer holidays and to ensure that everybody had sufficient opportunity to participate in the consultation.

A copy of the draft document was placed in the Town Hall reception for viewing and a press notice was published in the Watford Observer on 19 July 2019. Details about the consultation were uploaded onto the council's main website and also the dedicated Local Plan website. Emails were also sent to those on the council's Planning Policy consultation database. This includes statutory consultation bodies and wider members of the public and community. Three organisations (Hertfordshire County Council, Natural England and Transport for London) responded to the consultation on the SCI. Natural England and Transport for London gave positive feedback, while Hertfordshire County Council had no specific feedback to make.

A Consultation Statement has been prepared which addresses the feedback and the methods used during consultation on the document.

No relevant equalities data was collected during this consultation to inform this EIA.

### 4. What we know about the Watford population

Overall, Watford has a diverse, relatively young population who live in a variety of household types across the borough but with a noticeably large number living in rented accommodation. Whilst it is a prosperous town, it does, like most areas, have pockets of relative deprivation.

The demographics and profile of the borough have an impact on how the council engages and involves its community. Recent engagement work has highlighted a high preference for social media as a channel for communication and feedback – which reflects the younger, diverse nature of our population. It is a good indication that the council needs to explore both traditional and emerging methods of involving our communities in decision-making.

#### **Population**

The current population of Watford is 96,800 (mid 2018 estimate). Government population growth estimates expect Watford to reach 100,000 by the end of 2025. From this date, it is expected to grow by about 500 people per year.

The population density for Watford is circa 4,500 people per square kilometre. This makes it the most densely populated district area in England and Wales. However, in comparison with some metropolitan boroughs, particularly those in and around the outskirts of London, the density is relatively low.

### Ward level populations

Mid 2017 year population estimates show Central has the highest population of any ward in Watford and Tudor the lowest at 6,059 (mid 2018 estimates are due for publication in October 2019 but were not ready in time for this analysis).

Ward	2017
Callowland	8,075
Central	9,201
Holywell	8,542
Leggatts	7,864
Meriden	7,944
Nascot	8,779
Oxhey	6,734
Park	8,731
Stanborough	7,488
Tudor	6,894
Vicarage	8,777
Woodside	7,646

*This is ONS experimental data (Ward Level Mid-Year Population Estimates (experimental), Mid-2017)*

### Population projections

The 2016-based subnational population projections for local authorities are an indication of the future trends in population to 2041 – looking forward by 25 years.

- Watford's population is projected to be 99,400 by 2024 (the next five years) with the population reaching 100,000 in 2025 and 107,400 by 2041. This is lower than previous government projections (2014) but still a significant challenge for a borough of the size of Watford
- The bulk of the estimated % increase for Watford until 2041 is expected to stem from natural change - more births than deaths - with a small increase due to net migration within the UK and net international migration. The level of natural change can be attributed to the relatively young age structure of the current population, with a high proportion of residents within the child bearing age ranges.

### Households

The average household size in Watford is currently 2.45. This is average for the Eastern region.

### **Number of households**

The ONS data, based on the census, says that there were 36,681 households in Watford at the time of the Census; as of 31 January 2019 the figure was 39,052, reflecting the growth in housing in the borough over this time period.

### **Household size**

The 2016 projections estimate that, between 2016 and 2041:

- Watford's average household size will decrease from 2.45 to 2.33
- England's average household size will decrease from 2.37 to 2.26

### **Household Composition**

From the 2014 household projections, one person households see the biggest increase in household growth in Watford, representing 44% of the total household growth.

However, households with dependent children see the next biggest rise, with 35% of household growth; couples with other adults make up 9%; other (multi-person adult) households make up 7% and couple households (without children or other adults) make up the remaining 6% of all estimated growth.

### **Sex / gender of population**

In terms of gender breakdown, there are estimated to be fractionally more female than male residents but the difference is not significant. Research tends to show males cycle more than females.

### **Ethnicity**

Watford has a very diverse population, more so than the rest of Hertfordshire. For Watford, the Census 2011 shows the following breakdown in terms of ethnicity: White British (61.9%), White other (7.7%), Pakistani (6.7%), British Indian (5.5%) and British other Asian 4.4%).

Census information is now nearly 10 years old and it is likely that the ethnic profile of the borough has changed during this time. For example, it would not have captured the more recent EU arrivals to the borough (EU2 countries – Romania and Bulgaria, who were given residency rights in 2014).

**National insurance registration:** Census information is now nearly 10 years old and it is likely that the ethnic profile of the borough has changed during this time. For example, it would not have captured the more recent EU arrivals to the borough (EU2 countries – Romania and Bulgaria, who were given residency rights in 2014). We know from other data such as National Insurance Registration that Watford has experienced a relatively high increase in nationals from the EU2 countries applying for National Insurance registrations as Watford residents. This follows a period of a high number from EU8 countries (including Poland, Latvia, Lithuania) who were given freedom of movement to the UK from 2004. Throughout the period the arrival of new residents from south Asia (e.g. Pakistan / India) has remained relatively constant.

The statistics for 2019 – up to June 2019 – showed 2,141 registrations (the second highest in Hertfordshire). Of these: 661 of the registrations were from EU2 countries (Bulgaria and Romania) and 489 from South Asia. By comparison, EU8 countries had 192 registrations.

**Language spoken at home:** Other data sources, including school language survey on the languages spoken by Watford school children at home, endorse the National Insurance findings with English still the predominant language (at around 60%) followed by (in order of selection): Urdu, Polish, Tamil, Romanian, Gujarati, Pahari, Gujarati and Hindi.

**Births and origin of parents:** In 2018, nearly 60% (59.6%) of children born to Watford based parents, had one or both parents born outside of the UK, with 41.7% having both parents born outside of the UK. 52.3% of new mothers in Watford were born outside of the UK (1397 births in total, with 667 to mothers born in the UK and 73 born outside of the UK. Of these 252 mothers had been born in the Middle East and Asia and 257 in the ‘new’ EU countries – those that had joined since 2004, including Poland, Rumania and Bulgaria).

### Age

The largest populations by age band in Watford in 2018 were:

- 35-39 (8,681)
- 30-34 (8,169)

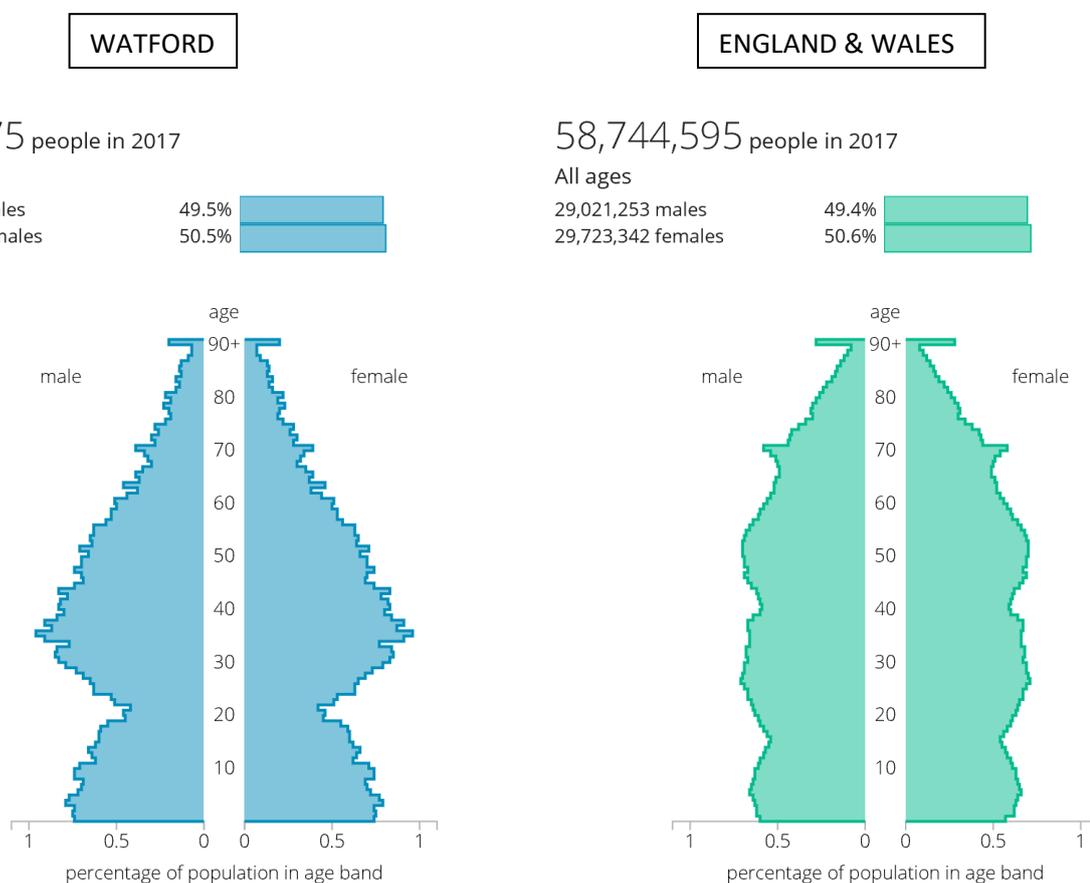
Age	Total
Age 0 - 4	7,108
Aged 5-9	7,082
Aged 10-14	6,247
Aged 15-19	5,194
Aged 20-24	4,820
Aged 30-34	8,169
Aged 35-39	8,681
Aged 40-44	7,445
Aged 45-49	6,756
Aged 50-54	6,315
Aged 55-59	5,325
Aged 60-64	4,296
Aged 65-69	3,467
Aged 70-74	3,132
Aged 75-79	2,285
Aged 80-84	1,861
Aged 85+	1,906

The numbers in each successive age-band fall progressively until there are estimated to be circa 7,000 who are 75+.

The average age in Watford in mid-2018 (ONS estimates) was 36.7. This is the second lowest in Hertfordshire after Welwyn Hatfield (35.9 years) but this would be expected given their student

population. This compares to 39.9 years for England and 41.6 years for the East of England.

The graphic below shows Watford’s population far more skewed toward 40 years and younger than England and Wales overall. Whilst single person households are increasing faster than households with families, there are a larger proportion of Watford residents in the ages where people are likely to be having families than in England and Wales overall.



### Disability / Health

Around 85% of the population of Watford state that they have ‘good health’ and just under 14% record a disability. We do not have details as to what these disabilities are but they will include a wide range of physical and mental health disabilities or impairment.

The 2018 NHS Health Profile’s summary conclusion is that the health of people in Watford is ‘varied’ compared with the England average. About 12% (2,300) of children live in low income families – this is an improvement on 2016 (14% / 2,700). Life expectancy for both men and women is similar to the England average, although life expectancy is 6.6 years lower for men and 3.4 years lower for women in the most deprived areas of Watford than in the least deprived areas.

The profile also shows that physically active adults (19 years +) is 68% for Watford compared to the England average of 66%. There has been a decrease from the 2017 profile in the percentage of adults classified as overweight / having excess weight from 60% to 55%, which is better than the England average of 61%. The percentage of obese children in Year 6 (aged 10-11) at 21% is significantly worse than in the 2017 Health Profile; the England average is 20%.

## **Religion / belief**

The religious breakdown in the Census 2011 of the main religions in Watford was: Christian (54.1%), Muslim (9.8%), Hindu (4.8%), with no religion stated at 21.4%.

## **Sexual orientation / Transgender**

- In 2014, 1.6% of adults in the UK identified their sexual identity as lesbian, gay or bisexual
- The likelihood of an adult identifying as lesbian, gay or bisexual decreased with age. Around 2.6% of adults aged 16 to 24 years identified themselves as lesbian, gay or bisexual. This decreased to 0.6% of adults aged 65 and over

Watford currently has no specific data on the LGBT community within the borough.

## **Deprivation**

The English Indices of Deprivation 2019 was published by the Government in September 2019, and updates the previous 2015 Indices, published in September 2015. The Indices of Deprivation measure relative levels of deprivation in 32,844 small areas or neighbourhoods, called Lower-layer Super Output Areas, in England

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains of deprivation which are combined and weighted to calculate the Index of Multiple Deprivation 2019.

The IoD2019 uses 39 separate indicators, grouped into seven domains (three of which contain sub-domains); the domains are Income; Employment; Health and Disability; Education, Skills and Training; Crime; Barriers to Housing and Services; and Living Environment. These are weighted to calculate the Index of Multiple Deprivations (IMD) 2019. In addition to the domains and their sub-domains there are two supplementary income deprivation Indices: Income Deprivation Affecting Children Index (IDACI) and Income Deprivation Affecting Older People Index (IDAOPI).

In the IMD 2019, Watford is ranked 195 out of 317 authorities, putting it in the 7<sup>th</sup> decile nationally. This means that, overall, Watford is less deprived than half the authorities in England.

Watford is the third most deprived authority in Hertfordshire. (Stevenage and Broxbourne are the most deprived.) However, three Hertfordshire authorities are among the 10% least deprived authorities in England (Three Rivers, East Herts and St Albans).

Overall, Watford is not an area with significant deprivation issues and the majority of the LSOAs within the town are in the bottom 50% of LSOAs nationally for deprivation; the borough's position has improved relative to that of 2015.

The combined deprivation index, which weights income and employment more heavily than the other domains, obscures the more deprived areas in Watford, which are affected by crime, living environment deprivation and education, skills and training deprivation in particular. This is, at least in part, because income and employment deprivation are less of an issue for Watford than for other areas.

The ten most deprived LSOAs in Watford, as ranked in the IMD 2019 are as follows:

Watford rank	Ward	LSOA code	Hertfordshire		England	
			Rank	Decile in Herts (1st = most deprived)	Rank	Decile (1st = most deprived)
1 (1)	<b>Central</b> (Water Lane, Gladstone Road, Grosvenor Road, part of Radlett Road, Brockleberry Close, Raphael Drive, top part of Queens Road)	E01023860 (009B)	5 (5)	1st (1st)	5055 (5005)	2nd (2nd)
2 (3)	<b>Holywell</b> (Caractacus Green, part of Charlock Way, Moor View, Jellicoe Road, Stripling Way, Rose Gardens)	E01023865 (011C)	21 (22)	1st (1st)	7239 (7800)	3rd (3rd)
3 (2)	<b>Meriden</b> (Garsmouth Way, Aldbury Close, Harvest End, part of York Way)	E01023876 (003D)	26(19)	1st (1st)	7924 (7590)	3rd (3rd)
4 (4)	<b>Holywell</b> (Ascot Road, Greenhill Crescent, Caxton Way, Croxley View)	E01023866 (011D)	27 (30)	1st (1st)	8294 (9203)	3rd (3rd)
5 (7)	<b>Woodside</b> (Haines Way, Queenswood Crescent, Sheriff Way, Nottingham Close)	E01023906 (001C)	61 (41)	1st (1st)	10719 (10062)	4th (4th)
6 (10)	<b>Oxhey</b> (Deacons Hill, Blackwell Drive, Riverside Road, Eastbury Road, Thorpe Crescent)	E01023883 (012B)	62 (49)	1st (1st)	10758 (10710)	4th (4th)
7 (13)	<b>Callowland</b> (Maude Crescent, St George's Road, Breakspere Close, Nicholas Close)	E01023857 (006C)	67 (56)	1st (1st)	10894 (10812)	4th (4th)
8 (9)	<b>Meriden</b> (Gaddesden Crescent, Bovingdon Crescent, Garston Lane)	E01023877 (003E)	73 (75)	2nd (2nd)	11225 (11837)	4th (4th)
9 (12)	<b>Leggatts</b> (The Harebreaks, Chestnut Walk, Foxhill, Brushrise, Elm Grove)	E01023870 (004C)	78 (52)	2nd (1st)	11515 (10734)	4th (4th)
10 (5)	<b>Stanborough</b> (Clarke Way, Rushton Avenue, Orbital Crescent, Harris Road)	E01023891 (002B)	92 (31)	1st (1st)	11970 (9377)	4th (3rd)

### MOSAIC profile

Our MOSAIC profiling of the borough enhances our understanding of our population and provides valuable context for our decision-making.

	Mosaic Code	Name	Description	Number of Household	2017 Watford %	2016 Watford %	Difference	Trend	Rank (last year)
1	J40	Career Builders	Singles and couples in their 20s and 30s progressing in their field of work from commutable properties	4,045	12.5%	11.9%	0.6%		1
2	I36	Cultural Comfort	Thriving families with good incomes in multi-cultural urban communities	3,321	10.3%	8.7%	1.6%		2
3	D14	Cafes and Catchments	Affluent families with growing children living in upmarket housing in city environs	2,499	7.7%	8.0%	-0.3%		3
4	D17	Thriving Independence	Well-qualified older singles with incomes from successful professional careers living in good quality housing	2,422	7.5%	5.4%	2.1%		7
5	M56	Solid Economy	Stable families with children renting better quality homes from social landlords	2,172	6.7%	6.4%	0.3%		6
6	J44	Flexible Workforce	Young renters ready to move to follow worthwhile incomes from service sector jobs	1,954	6.0%	7.0%	-1.0%		4
7	H35	Primary Ambitions	Forward-thinking younger families who sought affordable homes in good suburbs which they may now be out-growing	1,550	4.8%	6.8%	-2.0%		5
8	B08	Premium Fortunes	Influential families with substantial income established in large, distinctive homes in wealthy enclaves	1,237	3.8%	3.2%	0.6%		10
9	I37	Community Elders	Established older households owning city homes in diverse neighbourhoods	1,128	3.5%	4.1%	-0.6%		8
10	I39	Ageing Access	Older residents owning small inner suburban properties with good access to amenities	1,099	3.4%	3.4%	0.0%		9

Watford's MOSAIC profile (2018)

## 5. How will the council ensure equality is promoted through the Statement of Community Involvement

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Statement of Community Involvement:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

### A. Positive impacts

The SCI sets out how the council will involve communities, local businesses and other stakeholders in the planning process. The SCI seeks to widen community participation in the planning process, including the protected characteristics identified in the Equalities Act 2010. This is through the highlighting of all the potential ways to get involved and how engagement will be structured to ensure that nobody is excluded from participating. For example, the document sets out the key principles for consultation, which include providing translated, braille and large copy versions of all documents and holding all events in accessible venues.

The document also establishes varying methods of engagement to be used to ensure wider participation. Typically, younger generations prefer to engage using social media and the internet, whereas the elderly may prefer more traditional consultation methods including staffed exhibitions or online surveys. The SCI sets out the varying methods to be used to communicate with the community to ensure that nobody is excluded from participation.

The document itself has been designed to be relatively succinct to retain a person's attention span. It has also been written to explain rather than present the information. This has been done to foster a better understanding of the planning system and ensure that the document can easily be followed.

The Watford Borough Council website features browsealoud, which allows for translations into a large number of languages, speech and larger text. This enables the council to offer information and engagement in a way that addresses potential barriers, which could potentially discriminate, albeit unintentionally.

Through establishing a broad and comprehensive approach to consultation and engagement, the council is actively seeking to embrace all of its communities, reducing barriers and, by listening to all the feedback it receives, shape the town in a way that builds on the strength and cohesion of its diverse communities

## **B. Negative impacts**

The analysis of the Watford population identifies the diversity of the borough. This analysis acknowledges that this diversity could mean that there are some parts of our communities who may find it harder to engage with the council on planning related issues, which would mean the outcomes / decisions might not reflect the town we are or the people we serve.

However, we do acknowledge that in order to meet our equalities duty, particularly around fostering good relations and eliminating discrimination we need to ensure our SCI not only sets out how we will ensure we achieve this but acts as a blueprint and standard for engagement that we regularly test our approach against.

Planning is a very complex issue and can be difficult for people to navigate and fully understand in terms of its impacts on individuals, communities and the borough overall. This could be because of language barriers, physical or learning disabilities or age. There are a number of practical steps that can be taken to address these issues, these could be through translation, working with groups or individuals that represent parts of our community or explaining policies and documentation face to face.

## **6. Overall conclusion**

The SCI sets out a positive vision for stakeholder engagement in the planning process. The document itself has been written in an accessible style to explain the council's role in urban and regional planning. It also sets out how members of the community can get involved in planning decisions, from plan making to planning applications. This includes making provision for engaging 'harder to reach' groups. The SCI underlines the key principles to guide consultation to make sure that they are

inclusive and that everybody is able to participate - this would include holding all events in accessible venues to ensure that those with a physical disability are able to attend.

Consideration about how to make the document more accessible to those with hidden disabilities, including learning disabilities, should be explored.

## Summary of potential positive impacts and ways in which they can be ensured

Positive Impact	Protected characteristics	Ways to ensure the positive impact
<p>Explains every aspect of the planning process and sets out how the community can get involved at each stage of preparing a Local or Neighbourhood Plan, or making a development management decision.</p>	<p>All</p>	<p>Officers to use the document as a guide to shape how communities can participate in the planning process.</p> <p>Ensure copies of the document are easily accessible and available so that any member of the community interested in participating can be informed about how to do so. This should include putting relevant information online so that the council's brousealoud service can be used to overcome some barriers to reading and understanding.</p>
<p>Identifies the importance of different avenues of engagement to ensure that all members of the community have a chance to participate in the planning process. This includes the use of social media and the internet, but also more traditional forms of consultation such as letters, staffed exhibitions, online surveys and posters in public places.</p>	<p>All</p>	<p>Officers to ensure that a diverse range of engagement techniques are used to widen participation.</p>
<p>Sets out principles for good consultation practice that is inclusive and works to widen participation to 'harder to reach' groups. This includes making sure all venues used for events are accessible (including wheelchair and pushchair access). It also encompasses the provision of alternative versions of documents, such as translations or in braille, which should be provided upon request.</p>	<p>All</p>	<p>Ensure that the document is used by officers as a guide to shape future good practice for consultation.</p>

**Summary of potential negative impacts and ways in which they can be removed or mitigated**

<b>Negative Impact</b>	<b>Protected characteristics</b>	<b>Ways to mitigate the negative impact</b>
While the document directly refers to those with a physical disability, the document does not address hidden disabilities and those with learning difficulties who may wish to access the document	Disability	Upon request, the document could be explained to somebody should they want to come in

**This EIA has been approved by:**

**Kathryn Robson**

**Date 21 October 2019**