

## Appendix E: Integrated Impact Assessment Form (IIA)

The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement

***‘Enabling Luton to be proud, vibrant, ambitious and innovative’.***

### **Why do I need to do an IIA?**

The aim of this impact assessment process is to:

- Ensure adherence to the legal duties contained within the Equality Act 2010 and associated Public Sector Duty to analyse the impact of decisions to be undertaken by Council.
- Ensure the Council has **due regard** to equality taking a proportionate and timely approach to analysing the impact on citizens.
- Minimise duplication of initial impact assessments with regards to Environment and Health and maximise consideration of other key Council priorities of Inclusion and Community Cohesion.
- Ensure that the Council has been able to consider the social, health, environmental and economic impacts in its decision making in a single document and, where necessary enable the production of a comprehensive action plan to mitigate any potential negative impacts identified.

### **When do I need to do an IIA?**

- An IIA must be started at the beginning of any project, policy or strategy, and cannot be finalised until such time as all consultations, as required, are undertaken.
- The Impact Table will help you to make early consideration of the potential impacts of your proposal and should be used from the point at which preliminary report is taken to Corporate Leadership and Management Team (CLMT) where appropriate. By using this table at your earliest point in the project, potential impacts can be highlighted and it will also be clear whether you need to carry out a full IIA.
- If you complete this table and all impacts identified are neutral, i.e. there is no noticeable impact on characteristics and priorities listed and you are fully confident of this, please contact the SJU by email setting out how you have reached this judgement as it is unlikely you will need to carry out a full IIA.
- An IIA must at all times identify those who will be affected by the decision, policy or strategy.
- At a time of economic austerity IIA authors are minded to consider the whole range of decisions, both locally and nationally when analysing the impact on citizens.
- Your first early draft is to be sent to the Social Justice Unit for comments and guidance
- Once consultation has ended, the IIA must be updated with results of the consultation and returned to Executive, where required, for further consideration and approval – at this stage it will be signed off as completed by the Social Justice Unit.

**If you need further guidance please contact the Social Justice Unit (SJU). Please see links at the end of this document to key Corporate and Partnership documents that may help you complete this IIA.**

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<b>Proposal Title:</b>	Update on activities in Plaiter's Lea: <ul style="list-style-type: none"> <li>- Proposed name change</li> <li>- Extension of boundary</li> <li>- Sign off of Management Plan</li> <li>- Sign off of Area Appraisal</li> </ul>
<b>Lead Officer Name:</b>	Sarah Barker
<b>Date of IIA:</b>	16 July 2020

<b>Date updated after consultation:</b>	30 July 2020
<b>Early draft Seen by:</b> <i>(Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time)</i>	Maureen Drummond, 21 July 2020 Sue Frost

<b>Finalised IIA Signed and seen by SJU :</b>	
<b>Name:</b>	Maureen Drummond, Interim Equalities Manager
<b>Date</b>	21 July 2020

<b>Names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and agreed this assessment:</b> <i>(Please note the IIA must not be carried out by one person)</i>	Lucy Hubber Keith Dove Sarah Barker
<b>If there is any potential impact on staffing please include the name/s of the trade union representative/s involved in the preparation of this assessment or any supporting evidence of request to participate:</b>	No impact on staffing.

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### Proposal Outline

Information supporting the proposal (**who, what, where, how, why**). Breakdown of present users by ethnicity, age, sex, disability, religion/belief, sexual orientation (if recorded). Show areas in the town with the biggest and lowest needs. Greater emphasis is required at the start of the IIA on the service, how it is delivered now and how the new service will be delivered.

The Plaiters' Lea conservation area was established in 1991. We are required by law to consider the conservation area on occasion. A review was currently undertaken and the following have been proposed:

- Changing the name of the conservation area. Executive are asked to consider whether to retain the existing name, change it to 'The Hat District conservation area'; or to change it to 'Plaiters' Lea: the Hat District'.
- Extending the boundary east and west along Guildford Street to give the boundary on the west end a more natural boundary at the junction with Church Street, and to bring further listed buildings or those with historical links to the hat industry within the conservation area.
- The area has had an appraisal and a management plan has been drafted. Executive will be asked to agree these documents.

The name change will have no impact on residents or businesses within the conservation area, and is proposed to make the area more accessible to potential users as it reflects the 'Hatters' nickname used across the town.

The boundary change affects a few properties from 40 to 60 Guildford Street, and a vacant lot at the boundary with Church Street. Residents and businesses have been made aware of the proposal by letter, through an online consultation and through the opportunity to attend a virtual meeting. An email contact was also given.

The properties have mixed tenures including owner/occupier and rented business and domestic accommodation. From signage on the terraced housing from 50-60 Guildford Street, it is likely some of this is student accommodation. The exact social mix of occupiers is not known.

A conservation area is implemented to preserve features which add special interest to the area. Adding these properties to the conservation area will mean some permitted development rights are removed and planning permission will need to be sought (for example in putting up satellite dishes or adding extensions), which may bring additional cost and may mean some development is not permitted. New developments will have to be sympathetic to the existing environment and make a positive contribution to the character of the area. A leaflet explaining the implications was provided with the letter and on the consultation pages. The management plan gives further details on how the area is proposed to be managed and improved.

It is expected that there will be a neutral impact to the residents of properties brought within the conservation area boundary. Whilst there may be some additional maintenance costs, the improved environment will be beneficial.

It is expected that a change of name will encourage people to visit the conservation area, which will be beneficial to local businesses.

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## Impact Table

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 'protected characteristics' and the Council's Social, Environmental and Economic priorities.

Once you have completed this process you should have a clearer picture of any potential significant impacts<sup>1</sup>, **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race			X			
Sex			X			
Disability			X			
Sexual Orientation			X			
Age			X			
Religion/Belief			X			
Gender Reassignment			X			
Pregnancy/Maternity			X			
Marriage/Civil Partnership (HR issues only)			X			
Care Responsibilities <sup>2</sup> (HR issues only)			X			
Social & Health <sup>3</sup>						
Impact on community cohesion			X			
Impact on tackling poverty			X			
Impact on health and wellbeing			X			
Environment						
Impact on the quality of the natural and built environment	X					
Impact on the low carbon agenda			X			
Impact on the waste hierarchy			X			
Economic/Business						
Impact on Luton’s economy and/or businesses	X					
Impact on jobs			X			
Impact on skills			X			

<sup>1</sup> "Significant impact" means that the proposal is likely to have a noticeable effect on specific section(s) of the community greater than on the general community at large.

<sup>2</sup> This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

<sup>3</sup> Full definitions can be found in section 3

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Please answer the following questions:

<b>1. Research and Consultation</b>
1.1. Have you made use of existing recent research, evidence and/or consultation to inform your proposal? Please insert links to documents as appropriate.
<a href="#">Click here for local demographics and information</a>
The proposal is supported by English Heritage's Historical Area Assessment (2011); and a more recent area Appraisal.  All owners/occupiers/residents/leaseholders of properties affected by the extended boundary have been consulted by letter. An online consultation was open for 28 days and a virtual meeting held for any questions to be asked. Local councillors were also involved in proposals from an early stage.
1.2. Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate).
<b>Guidance Notes:</b> <i>If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.</i>
<a href="#">Click here for the LBC Consultation Portal</a>
See 1.1.
1.3. Have you carried out any specific consultation with citizens likely to be affected by the proposal? If yes, please insert details, links to documents, as appropriate above. Please show clearly who you consulted with, when you consulted and the outcomes from the consultation. Mitigations from consultation should be clearly shown in Action Plan at end of document.
<a href="#">For advice and support from Consultation Team click here</a>
See 1.1.

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<b>2. Impacts Identified</b>
2.1. Where you have identified a <b>positive</b> impact, for <b>communities or staff</b> , please outline how these can be enhanced and maintained <b>against each group identified</b> . Specific actions to be detailed in action plan below.
<b>Guidance Notes:</b> <i>By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?</i>
The change of name will enable people without a detailed knowledge of the hatting industry understand the historical significance of the conservation area. This could provide marketing and investment opportunities. Properties brought within the boundary should be maintained to a higher standard so historic features are not lost, which will provide a more positive environment for the occupants.
2.2. Where you have identified a <b>negative</b> impact please explain the nature of this impact and why you feel the proposal may be negative. Outline what the consequences will be <b>against each group identified</b> . You will need to identify whether mitigation is available, what it is and how it could be implemented. Specific actions to be detailed in action plan below.
<b>Guidance Notes:</b> <i>By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?</i>
2.3. Where you have identified a <b>neutral</b> * impact for any group, please explain why you have made this judgement. You need to be confident that you have provided a sufficient explanation to justify this judgement.
<b>Guidance Notes:</b> <i>By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic</i>
Most owners and occupiers should not experience any changes to their circumstances. Where there may be additional maintenance costs, or costs to acquire planning permission by being brought in to the conservation area, they will benefit from the improved environment.

<b>3. Social &amp; Health Impacts</b>
<p>3.1. If you have identified an impact on community cohesion<sup>4</sup>, tackling poverty<sup>5</sup> or health and wellbeing<sup>6</sup>, please describe here what this may be and who or where you believe could be affected, <b>Please also ensure that you consider any possible impacts on Looked After Children.</b></p>
<p><b>Guidance Notes:</b> Please use this section to describe the social and health impacts and detail any specific actions or mitigations in the action plan below.</p> <p><a href="#">For advice &amp; support from the Social Justice Unit click here</a></p> <p><a href="#">For advice and support from the Public Health team click here</a></p>
<p>The opportunities for investment, increased footfall for businesses and marketability of the area, along with environmental improvements will benefit residents wellbeing.</p>

<sup>4</sup> is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

<sup>5</sup> is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, e.g. due to poverty, low income and/or in areas of high deprivation

<sup>6</sup> Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?



## 4. Environment Impacts

4.1. If you have identified any impacts related to the built and natural environment<sup>7</sup>, low carbon<sup>8</sup> and waste minimisation please describe here what this may be and who or where you believe could be affected

**Guidance Notes:** Is the proposal likely to impact on the waste hierarchy which includes issues shown in the table below:

### Waste Hierarchy



[For advice and support from the Strategy & Sustainability Team click here](#)

The extension of the boundary should improve the environment of properties coming within the conservation area boundary.

<sup>7</sup> Is the proposal likely to Impact on the built and natural environment covers issues such as heritage, parks and open space, cleanliness, design, biodiversity and pollution?

<sup>8</sup> Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

<p><b>5. Economic Impacts</b></p>
<p>5.1. If you have identified any impacts related to Luton's economy and businesses <sup>9</sup>, creating jobs<sup>10</sup> or improving skill levels <sup>11</sup>, please describe here what this may be and who or where you believe could be affected</p>
<p><b>Guidance Notes:</b> Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below. Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below.</p>
<p><a href="#">For advice and support on Economic Development click here</a></p>
<p>The change of name to include the term 'hat district' will bring added attention to the area, as it will reinforce the town's links to the hatting industry. This will open up opportunities to promote the 'brand', encourage visitors, and bring investment and income to the area.</p>

<sup>9</sup> Is the proposal likely to impact on Luton's economy and businesses for example by creating an opportunity to trade with the Council, support new business opportunities?

<sup>10</sup> Is the proposal likely to impact on the creation of new jobs in the local economy? This will also link to health and well-being and the reduction of poverty in the social box.

<sup>11</sup> There are significant skills gaps in Luton's economy. Is the proposal likely to create opportunities for up skilling the workforce or to create apprenticeships?

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### Impact Enhancement and Mitigation

Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below:

Action	Deadline	Responsible Officer	Intended Outcome	Date Completed / Ongoing
Implementation of Management Plan	Ongoing	Council-wide	To improve the environment of the conservation area. To bring additional investment and income to the conservation area.	Ongoing

A review of the action plan will be prompted 6 months after the date of completion of this IIA.

### Key Contacts

Name	Position
Sarah Barker	Team Manager Planning Policy & Environment
Maureen Drummond	Equalities and Inclusion Manager
Lucy Hubber	Service Director, Healthy Lives & Children
Keith Dove	Transportation Strategy Manager

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### Next Steps

- All Executive Reports, where relevant, must have an IIA attached
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, economic, business and environment)
- All reports are to be forwarded to the Social Justice Unit, Legal Department, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- On the rare occasion that the Social Justice Unit are unable to sign off the report, e.g. recommendations are in breach of legislation, a statement will be submitted by Social Justice Unit Manager or Equality and Diversity Policy Manager

Completed and signed IIA's will be published on the internet once the democratic process is complete

### Useful Documents

#### Corporate Plan

<http://intranet/SupportServices/Document%20library/LBC-corporate-plan.pdf>

#### Equality Charter

[https://www.luton.gov.uk/Community\\_and\\_living/Lists/LutonDocuments/PDF/Social%20Justice/Equality%20Charter.pdf](https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Social%20Justice/Equality%20Charter.pdf)

#### Social Justice Framework

#### Joint Strategic Needs Assessment (JSNA)