



Appendix 6

Form to be used for the Full Equalities Impact Assessment

Service Area:	Regen and Economy	Section: Regen	Date of Initial assessment: 27 th July 2023	Key Person responsible for assessment: Tom Bridgman	Date assessment commenced: 27 th July 2023
Name of Policy to be assessed:		Land appropriation in Blackbird Leys & Northfield Brooke Ward Specifically, one in District Centre and one in Knights Road.			
1. In what area are there concerns that the policy could have a differential impact	Race		Disability		Age
	Gender reassignment		Religion or Belief		Sexual Orientation
	Sex		Pregnancy and Maternity		Marriage & Civil Partnership
Other strategic/ equalities considerations	Safeguarding/ Welfare of Children and vulnerable adults		Mental Wellbeing/ Community Resilience		Socio-Economic Status
2. Background: Give the background information to the policy and the	Project Overview: This EqIA relates to the appropriation of land for planning purposes located at two sites in Blackbird Leys, one at the District Centre and one at Knights Road, these are shown in appendices 1-3 of the Cabinet report.				

perceived problems with the policy which are the reason for the Impact Assessment.

Changes being considered in this EqIA

The effect of the appropriation is twofold:

First it will allow land forming part of the Knights Road open space and other land that may be public open space land in the District Centre to be developed for housing when it is currently held for public recreational purposes.

Second, private rights of access to this land will cease to be capable of being enforced.

The loss of public recreational space has the potential to impact all parts of the local community, but more so for those using the space for exercise and younger residents using the space for informal play and gathering spaces. However, mitigations have been put in place to address this.

Given the potential impact on residents due to loss of private access rights from their properties and the known value that is placed on access to open space in terms of providing mental wellbeing benefits this EqIA is necessary to consider the potential impact based on the information available and in the socio-economic context of Blackbird Leys.

The existing public open space at Knights Road is approximately 22,216m² and the proposed public open space would be 5,586m² - a reduction of 75%. Also, there is a 13% reduction in public open space at the District Centre site from 5,048m² to 4381m². The area of the Knights Road site which would be lost currently comprises open grassland with the wooded area along the southern edges of the site being retained as an ecological buffer to Northfield Brook. (15th August [Planning Committee report](#))

Blackbird Leys development details

The appropriation is to enable Phase 1 of the Blackbird Leys redevelopment to be completed, which will see:

- 84 of 294 new affordable homes built
- a new community centre,
- retail units, and
- a public square.

The appropriation is required to deliver the wider Blackbird Leys development, the overall benefits of which are listed in Appendix 5, which accompanies the Cabinet report. Whilst the plans fulfil the land use requirements set out in the Local Plan

the land being appropriated at Knights Road and the District Centre is currently public open space and as such is it necessary to consider whether there are any access and usage impacts because of the appropriation, and whether there is likely to be a disproportionate negative impact on the community because of this change.

When will we work start?

The appropriation is part of the wider redevelopment scheme for Blackbird Leys. If planning permission is granted for this scheme this summer then the construction of Phase of the development 1 will start at the end of 2023.

What is driving the change?

The sites in question have been allocated for development in the Local Plan. The Local Plan was subjected to a full range of assessments, including an Equalities Impact Assessment. The loss of the sites in question is justified to provide much needed affordable housing, contributing to the delivery of the [Council's Corporate Strategy 2020-2024](#) and the [Housing, homelessness and rough sleeping strategy 2023-2028](#), and creating a new district centre in Blackbird Leys as part of the Blackbird Leys redevelopment.

The planning application contains detailed plans for 294 new social rent and shared ownership homes across two sites, the district centre and Knights Road. This is split with 210 (174 social rent and 36 shared ownership) at the new District Centre and 84 (all shared ownership) at Knights Road. Using the space, the site will also provide the community with:

- green open spaces including community gardens
- new and improved shops
- a new community centre
- improved road infrastructure and a safe, segregated cycle route

What will happen if the change is not implemented?

Not implementing the change will mean the council and Peabody will be unable to deliver the 294 new affordable homes, and the other new amenities such as the green open space and community centre, across the site and fulfil the Local Plan policy.

3. Methodology and Sources of Data:

1. Qualitative Data: Notice in Oxford Mail, Planning application responses, redevelopment consultation (formal and informal) Oxford City Council Staff.

<p>The methods used to collect data and what sources of data</p>	<p>2. Quantitative Data: Census Data 2021, Joint Strategic Needs Assessment, Blackbird Leys and Northfield Brook Ward Profile 2021; English Index of Multiple Deprivation 2019; Leys Community Profile on the Oxfordshire Insight, Local Plan 2040 and associated documents</p>
<p>4. Consultation</p> <p>This section should outline all the consultation that has taken place on the EIA. It should include the following.</p> <ul style="list-style-type: none"> • Why you carried out the consultation. • Details about how you went about it. • A summary of the replies you received from people you consulted. • An assessment of your proposed policy (or policy options) in the light of the responses you received. • A statement of what you plan to do next 	<p>1st-15th July 2023- A notice of the intention to appropriate land was published in the Oxford Mail for 14 consecutive days. Comments were invited for 28 days. No comments on the appropriation itself have been received.</p> <p>Since March 2019 - Consultation on the wider development scheme has been undertaken. This engagement consisted of four main stages: (i) informing the community about the planning process for the site and activities to gather comments and ideas to help inform proposals; (ii) developing the vision and masterplan for the regeneration through Community Planning Days in May 2019; (iii) further engagement events in March 2020 (mostly online due to the pandemic) to develop the detailed proposals, and; (iv) pre-submission engagement from March 2021 which continued throughout the year to finalise the proposals for submission. Events, door knocks, leaflet drops, phone calls and meetings also took place. Almost 500 people attended events and over 1500 comments were received from community members.</p> <p>Members of the public and statutory organisations have been invited to comment on the planning application for the site, currently being considered by the Local Planning Authority, (planning application number 23/00405/OUTFUL). Comments most relevant to subject of this EqlA are as follows:</p> <ul style="list-style-type: none"> • <i>Loss of green space at Knights Road will mean children have even fewer places to play.</i> • <i>The local area will be much poorer for the loss of green open space.</i> • <i>The proposal will result in the loss of one of the few green spaces in Blackbird Leys.</i> • <i>Objections to destroying woods to make an entrance to the Nature Park coming off Knights Road when a road entrance already exists from Spindleberry onto the Nature Park.</i> <p>These comments are in line with the comments in the September 2022 Public Health commissioned Leys Profile, which gathered responses from approximately 230 participants in the Leys area. This research noted the value the local community give to their ability to access green space. When considering the challenges of living in the area younger people mentioned the cost of living and the lack of affordable housing, as well as access to services.</p>

5. Assessment of Impact:

Provide details of the assessment of the policy on the six primary equality strands. There may have been other groups or individuals that you considered. Please also consider whether the policy, strategy or spending decisions could have an impact on safeguarding and / or the welfare of children and vulnerable adults

The land subject to appropriation and subsequent proposed development for housing at Knights Road is of poor-quality, informal, mown, public open space ([Local Plan Policy SP4 9 and SP15](#)). It is used for informal recreation; there are two football goals in the space, thought to have been in situ for circa 20 years. There are also two pieces of exercise equipment on the site which are thought to have moderate public usage. It is not a formal playing pitch and does not feature in the Council's **Oxford Playing Pitch Strategy 2022-2036**. There have been no registered bookings or requests on the Council's Parks Team system for use of this space. The major clubs in the area, Greater Leys FC and Oxford Blackbirds, have used the facilities at Blackbird Leys Park, Oxford Academy and Frys Hill.

Whilst there might have been some ad-hoc informal usage as is typical in green spaces, the site is not currently used for formal sports provision, nor has it been for at least the last 10 years. Current and emerging need can be accommodated within the nearby facilities and at the new Orion Academy which will have a community use agreement in place. There are 8 existing football pitches in Blackbird Leys Park which is located approximately 600 meters away. Sandy Lane sports field has 4 pitches and is located approximately 800 meters from the site. Fry's Hill Park (200 meters) and Gillan's Park (700 meters) provide alternative spaces for walking and exercise near the site. These parks are much larger and are located within a 10 minute walk of the site. The land at Knights Road is also used by dog walkers, people exercising and those accessing the Kassam football stadium, particularly on match days.

The current use of the space is not known though it is likely that residents living in properties Knights Road and Spindleberry Close would access the open space given their proximity to it. There are several bungalows in on this close, some have additional handles and railings to access the properties which suggests there are people with mobility issues, elderly, living here. Residents need to be made clear what alternative routes are available.

Value of green infrastructure (green spaces, parks, woodlands etc.)

The Local Plan is informed by the [Oxford City Council Green Infrastructure Study \(July 2022\)](#). This study states that the top 10 quality parks and accessible natural green spaces generally fall within areas of lower deprivation, although this is not always the case. Exceptions, where higher quality sites are in more deprived areas, include Blackbird Leys Park, Gillians Park, Sunnymead Park, Fry's Hill Park, Lye Valley Nature Reserve and Land adjacent to Eastern Bypass (Science Park). This points to the quality alternative provision available for sport and leisure in the area, suggesting that the area is well served green infrastructure regardless of the loss of the space in question.

The Green Infrastructure Study notes that there is increasing evidence to show that access to high quality open space and Green Infrastructure plays an important part in people's health and wellbeing. The report notes that whilst this is true for the whole population, disadvantaged communities appear to accrue an even greater health benefit from living in a greener environment. Blackbird Leys Centre is noted as having no access to large/destination parks but good access to local/neighbourhood parks.

The value of green infrastructure has also been keenly recognised during the COVID 19 pandemic where access to green space has played a key role in people's well-being: alongside a wider appreciation of nature.

Public Health England's report Improving Access to Greenspace (2020), outlines 3 main barriers to accessing green space. These are:

- Physical barriers: proximity, physical obstacles, transport, and lack of facilities.
- Social and cultural barriers: social experiences, cultural experiences, and different values.
- Perceptions, awareness, self-efficacy, and interest: perception of safety, lack of awareness, low confidence, time constraints, and lack of interest.

Creating a new district centre with accessible green space and more safe areas to play and socialise will address some of these issues and help create a more inclusive space for all users.

Improvements to green infrastructure/replacement open space

There will be a period of disruption when the construction takes place, however, the new development will offer the following benefits:

- A better-quality area of open space
- Knights Road would retain the existing woodland buffer and would include a central green
- New and enhanced spaces for social activities for the local community – both for businesses and residents
- new retail units
- A new community centre, the design and delivery of which will include meaningful community engagement to ensure the community's needs are met.
- Pocket parks, additional planting and soft landscaping and seating, creating of a more welcoming and inclusive space for the whole community to enjoy

The Knights Road site is adjacent to the Spindleberry Nature Reserve and the Northfield Brook. As part of the development improvements will be made to both access to, and habitat quality of the Northfield Brook – bringing benefits to both the residents and local wildlife. Existing planting/trees around Northfield Brook will be maintained. A biodiversity survey and report were issued evaluating the effects of the development on the surrounding nature park and associated woodland which shows that ecologists were satisfied. Preserving this is an important part of how people enjoy the area and the local biodiversity.

The masterplan provides crucial infrastructure for walking, cycling, and using public transport which not only frees-up road space but also improves air quality. Reducing reliance on motor vehicles also enhancing the public realm, making a safer and more accessible space. The existing sites suffer from poor passive surveillance, underused leftover spaces and subsequently are vulnerable to crime.

Demographics

A comprehensive Public Health **Leys Community Profile** was published in September 2022 in the Blackbird Leys and Northfield Brook wards, known as the Leys (or Greater Leys). This study includes a population profile, including the level of deprivation in the area, local services and the community insight. This points to several challenges relating to health and wellbeing in the Leys. Access to green spaces is valued by the local community, as is the need for affordable housing and greater access to services. The following summarises key points raised by the community about what they like about living in the Leys and the challenges.

In response to the question, **what do you like about living in the Leys:**

- Overall the most popular answers were ‘Access to green spaces’ (39% chose this option) and ‘near to friends/family’ (38% chose this option).
- There were differences for different groups of respondents
 - o Access to green spaces was particularly important for those aged 35- 54 (47%) and males (44%)
 - o Being ‘near to friends/family’ was more popular for those aged 18-34 (59%), those from Blackbird Leys (51%) and females (42%)
- There were some interesting differences in the responses from each locality
 - o 26% of those in Blackbird Leys chose ‘sense of community’ compared to only 16% of those from Greater Leys
 - o ‘Access to services’ was chosen by 37% of those in Blackbird Leys compared to 21% in Greater Leys
 - o ‘Affordable housing’ was chosen most often by those from Greater Leys (34%) compared to 19% from Blackbird Leys

Challenges (extracted from the community insight report)

Oxford Hub asked residents about what they dislike about living in the Leys.

- One third of respondents chose 'lack of services,' 'poor quality services' and 'cost of living' as things they disliked most about living in the Leys
- For those aged 18-34 'Cost of living' 50% and 'Lack of affordable housing' (44%) were chosen most often
- 'lack of services' and 'poor quality services' were highlighted most often by female respondents and those from Blackbird Leys
- Those from Greater Leys were more concerned by the 'cost of living' (37%) and 'lack of affordable housing' (26%) than those from Blackbird Leys.

There is a balance to be reached in all developments, based on the needs of the current and future populations, the available infrastructure, environmental sustainability, and the need for housing, amongst many others. From the feedback that has been received and the evidence available through the research that has taken place, on balance the proposed change, and resulting redevelopment in the area, whilst resulting in a loss of open space, and more direct access to green open space for some residents, will provide the community with much needed affordable housing and improved services and facilities that will help to make it a more inclusive space for all user groups.

This report uses 2011 Census data, which has been superseded by the 2021 Census. Ward profiles are available to show the latest population data from the 2021 Census.

These sources have been used to complete the tables below.

Data is used from multiple sources including 2021 census and ward profiles. Where possible most recent data has been used and date cited. In some case the data is limited, it is highly recommended that monitoring processes are put in place where that is the case. The assessment is based on quantitative data that has been published for the public to see.

According to the latest Census data (2021) there 7075 people living in Northfield Brook (NB) ward and 6,392 In Blackbird Leys ward.

Summary stats:

- 23% of people have no qualifications in NB compared to 18% across England (socio-economic status)

- 26% of children aged 0-19 are in relative low-income families in NB compared with 20% across England (age, socio-economic status)
- 42% of people aged 16-74 are in full time employment in NB compared to 34% across England (socio-economic status)
- 28% of households have no car in NB compared to 24% across England (socio-economic status)
- The overall crime rate is higher than average across England (socio-economic status)
- The % of people satisfied with their neighbourhood is 83%, higher than the England average of 79.3% (health and wellbeing, socio-economic status)
- 18% of people have a limiting long-term illness in NB compared with 17% across England (health and wellbeing, disability)

Table 1: Key stats on protected characteristics where the impact is likely to be neutral

Protected Group	Data Analysis (Northfield Brook Ward)
Ethnicity	<p>White British: 58%, Oxford Av: 70.7%) Non-White: 29.5% (England Av 19.0%) Non-White British: 12.3% England Av: 7.5%) Mixed: 6.3%, England Av: 3%) Asian: 9.1%, England Av: 9.6%) Black: 11.6%, England Av: 4.2%) Other ethnic Group: 2.6%, England Av: 2.2%) Households with multiple ethnicities: 19.5%, England Av: 10.4%)</p> <p>Born outside the UK: 26.8%, England Av: 17.4%</p> <p>All people in household have English as main language: 81.1%, England av: 89.3%</p> <p>No adults but some children have English as main language: 3.2%, England av: 1.4%</p> <p>No household members have English as main language: 8.4%, England av: 5%</p>

Gender reassignment	No specific data is available for Blackbird Leys. Data for Oxford shows, 16 and over): -Gender identity the same as sex registered at birth (88.8%) (Lower than Oxfordshire and England) - Gender identity different from sex registered at birth but no specific identity given (0.6%)
Religion/Belief	Christian- 47%, England average 46.3% Buddhist- 0.5% (same as England average) Hindu- 1.3%, England average 1.8% Jewish – 0.2%, compared to 0.5% England average Muslim- 6.1%, compared to 6.7% England average Sikh- 0.6%, compared to 0.9% in England Other- 1.1%, compared to 0.6% in England No religion- 36.1% compared to 36.7% in England
Sexual Orientation	No specific data is available for Blackbird Leys. Data for Oxford shows, (for 16 and over): 80.4% = Straight or Heterosexual (Oxfordshire = 88.4%) Bisexual= 3.6% (higher than Oxfordshire and England)
Pregnancy and Maternity	No data available locally for this. Birth rate data available at Oxfordshire level. We know there are lots of families in BBL.
Marriage and Civil Partnership	Married or civil partnership couple family 27.0%, England average is 30.4%

Table 2: Key stats on protected characteristics where the impact is likely to be negative

Protected Group	Data Analysis (Northfield Brook Ward)	Analysis/ insights/ impact considerations	Mitigation
Disability	Attendance Allowance claimants (paid to people over the aged of 65 who are severely disabled. Physically or mentally and need a great deal of help) - claimants is 12.8%, compared to 11.7% in England	Impact: negative (immediate) Higher than average number of residents with disabilities and or long term/terminal ill-health.	In the longer term the redevelopment is likely to have a positive impact re age and disability – creating a more inclusive and accessible place: Wide, high-quality footpaths are proposed throughout the development, with a minimum width of two metres, facilitating pedestrian movement. Street

	<p>Personal Independence Payment (PIP) (helps with some of the extra costs caused by long-term disability, ill-health, terminal ill-health)- 11.3%, compared to 7.9% in England</p>		<p>lighting will be provided, along with dropped kerbs and designated pedestrian crossing points. This will ensure that the elderly, those travelling with buggies and those who may struggle to walk can travel around and through the development. A sloped access from the Knights Road homes, towards the Northfield brook has been incorporated into the design to ensure disabled access is provided to this area, despite the change in levels.</p>
<p>Age</p>	<p>21.9% are aged 0-15; higher than the England average of 18.6%</p> <p>68.7% are aged 16-64, compared to the England average of 63%</p> <p>9.4% aged 65+, compared to 18.4% England average.</p> <p>79.6% of pensioner households have a pension living alone, compared to 58.3% in England.</p> <p>Lone parent families with dependent children: 31.3%, compared to England average of 24.2%</p>	<p>Impact: negative (immediate)</p> <p>Younger than average population, suggesting lots of families live in the area. Higher than English average of LP households with over a 1/3 of households lone parent households.</p> <p>Impact on children who may use the space to play and have a kickabout and adults and elderly who may use the space for walking, dog walking etc.</p>	<p>Alternative routes will be communicated and to ensure residents are able to access the facilities at the Kassam and alternative open space.</p> <p>Replace/relocated goal posts and relocate exercise equipment to alternative park in proximity</p> <p>In the long term, the new district centre will provide space for play, have trees/planting and provide space for multipurpose gathering and seating. Landscaping will enhance the brook to make it more accessible. The design includes a new central green space for natural informal play and a nature trail as well as a residential roof terrace to help promote intergenerational living.</p>

		Child development/Life chances/opportunities are severely reduced by families in difficult circumstances Isolation - due to lack of income, reduced mobility links increases limited access to information/resources, less social interaction with neighbours, single older people living alone.	
Sex (M/F) Census 2021	48.2% male, 51.9% female	Gender is balanced. Impact: Neutral	In the long-term the new district centre will be more inclusive for all. Girls and young women want natural surveillance achieved when green spaces are surrounded by improved lightings and buildings. These make the spaces safer.
Health and wellbeing	6.3% Incapacity benefits claimants, compared to 3.9% in England The rate of emergency hospital admissions for all causes is high; far worse than England and Oxfordshire averages with score of 167.1, the lowest score being 31.5. Obesity in year 6 (%) in Blackbird Leys is 25%, this is like England and worse	Impact: Negative Data from the latest JSNA points and the Leys Profile points to the level of health disparity in the area and the concerns the community have in terms of access to these services.	Replace/relocated goal posts and relocate exercise equipment to alternative park in proximity Improving access to health services is important to the local community, as the recent Leys Profile shows. Work is underway to create a health hub offer from the leisure centre in Blackbird Leys to help address some of these concerns.

	than Oxfordshire. (JSNA)	Anecdotally, we know that whilst the space is not used often there are people who walk on the space and may use it to access neighbours etc. These individuals will be impacted by this change, and this could have a determination impact on their physical and mental health.	The new development will create a sustainable and eco-friendly neighbourhood, with a focus on boosting wildlife and healthy living. The design includes a new central green space for natural informal play and a nature trail as well as a residential roof terrace to help promote intergenerational living. Impact
Socio-economic	4.8% claiming unemployment benefit (May 23), England average is 3.8% 11%- Working age workless benefit claimants (Nov 22), compared to 7.9% England average	Impact: Neutral	In the longer term, new employment opportunities will be available to residents and the wider Leys population during the construction and operation of the building. Where possible, local companies and suppliers will be preferred, and the appointed contractor will be working with local schools, colleges, and charity organisations to provide work experience and mentorship.

[Oxfordshire Local Area Inequalities Dashboard – Blackbird Leys](#)

6. Consideration of Measures:

<p>This section should explain in detail all the consideration of alternative approaches/mitigation of adverse impact of the policy</p>	<p>The key mitigations are as follows:</p> <ul style="list-style-type: none"> • Move the existing goals and exercise equipment to an alternative site in the area- potentially Frys Park • Alternative routes and parks/open space access and facilities to be communicated throughout the construction phase and following its completion • Continue to focus on providing functions in the new development that make up for the loss of space. Creating a new district centre, including a new community centre, creating more safe space to meet and play and opportunities for community gardens, art, markets etc to be explored with the community • Provide ongoing updates on the progress of the development, addressing concerns and demonstrating tangible milestones achieve <p>The alternative would be to not develop Knights Road, which would impact the ability to delivery 300 homes across the scheme as affordable homes (the scheme viability for the entire site is interlinked) which will result in significant local benefit for new retail and community centre for residents to use.</p>
<p>6a. Monitoring Arrangements:</p> <p>Outline systems which will be put in place to monitor for adverse impact in the future and this should include all relevant timetables. In addition, it could include a summary and assessment of your monitoring, making clear whether</p>	<p>There is no baseline data available on the usage of the space currently as this is not monitored nor would it be feasible to do so.</p> <p>This EqIA will be shared with those designing the new open space as part of the wider redevelopment. A further EqIA will be completed as part of the design for the new space in the district centre.</p> <p>The new open space will be monitored in line with the usage of other parks the Council monitors on a routine basis. Any further policy reviews in relation to parks will be subject to further equalities assessments.</p>

you found any evidence of discrimination.					
7. Date reported and signed off by City Executive Board:		13 th September Cabinet			
8. Conclusions: What are your conclusions drawn from the results in terms of the policy impact		<p>The regeneration masterplan for Blackbird Leys focuses on delivering 100% affordable housing with nearly 300 new homes being built. It aims to deliver a wide range of benefits, which will present positive equalities implications.</p> <p>Whilst this change is likely to affect those who are currently using the space, the goal is to find a balance between the need for affordable housing development and the preservation or replacement of residents' access to open space. The mitigating actions and the range of alternative green spaces and parks available in the area suggest that the appropriation will not have a disproportionately negative impact on the protected characterises. It is vital that the impact is monitored through effective communication with the community throughout and after the development and that another EqIA is completed to better understand if the mitigations put forward have been sufficient in respect of the rights and well-being of the community.</p>			
9. Are there implications for the Service Plans?	To be monitored through BBL masterplan delivery	10. Date the Service Plans will be updated	To be monitored through BBL masterplan delivery	11. Date copy sent to Equalities Lead Officer	14 th August 2023
13. Date reported to Scrutiny and Cabinet:	Cabinet, 13 th September	14. Date reported to Cabinet:	Cabinet, 13 th September	12. The date the report on EqIA will be published	5 th September 2023

Signed (completing officer) Elaine Swapp

Signed (Lead Officer)

Please list the team members and service areas that were involved in this process:

Milli Kalia- Equalities Lead Officer

Amber Giles – Community Health Development Officer for the Leys

Hollie Morgan – Locality Manager, Communities

Carolyn Ploszynski – Head of Regeneration and Economy

Tom Woodhams- Legal

Karoline Soisalo de Mendonca – Regeneration Project Manager

Chris Bell- Green and Blue Spaces Development Manager