# London Borough of Hackney Equality Impact Assessment Form

# **Title of this Equality Impact Assessment:**

Smoke Control Order 2024

# **Purpose of this Equality Impact Assessment:**

To assess whether the consolidation of existing multiple Smoke Control Orders into a single boroughwide Order and the inclusion of moored vessels within its scope would have an impact on any protected groups in Hackney.

Officer Responsible: (to be completed by the report author)

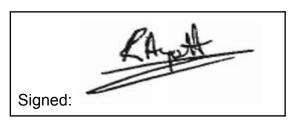
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<b>Directorate:</b> Climate, Homes & Economy	Department/Division:
	Land Water Air Team / Climate, Sustainability
	and Environmental Services

Strategic Director: Rickardo Hyatt Date: 12 February 2024

**Comment:** I approve this EIA.

Section 149 of the 2010 Equality Act sets out the three equality needs. The equality need that is most relevant to the proposal is the need to eliminate discrimination. This proposal does not amount to direct discrimination, as no individual is being treated less favourably by a reason of a protected characteristic.

The EIA sets out the actions that will be undertaken to ensure that the risks are managed effectively and that the benefits are maximised.



#### **STEP 1: DEFINING THE ISSUE**

#### 1.1. Summarise why you are having to make a new decision

The burning of solid fuel is a significant contributor to levels of particulate matter, especially the finer particles ( $PM_{2.5}$ ). According to the 2019 Clean Air Strategy, it is estimated that 38% of primary  $PM_{2.5}$  emissions in the UK arise from wood / coal burning associated with residential heating. Various scientific studies have provided evidence of the potential harm to health from exposure to emissions from solid fuel burning, especially the fine particulates which are capable of reaching further into the airways.

The prevalence of solid fuel burning within the borough is not known. However, a door-knocking survey commissioned by the Zero Emission Network which was carried out in 2020 revealed that 20% of those who responded had an appliance for burning solid fuel. Of these, 47% burned solid fuel in an open fireplace and 25% in a stove / burner. While the properties visited were mainly houses, the data indicates that around 10% of these properties have an open fireplace and 5% have a stove or burner.

Anecdotally, the popularity of wood burning stoves has been increasing in recent years. At the time that the survey was carried out, 58% of those who burn solid fuel felt that they could reduce the amount of usage time by up to half. However, since this time, the price of gas and electricity supplied by utility companies has increased significantly. These increased costs may make heating a single room with a solid fuel burner more financially attractive than using the central heating.

In order to address the impacts on health and air quality, Smoke Control Orders were put in place during the late 1950s and early 1960s which, together, cover the whole area now occupied by the London Borough of Hackney. At this time, the area which now forms the London Borough of Hackney consisted of several smaller Metropolitan boroughs, namely Hackney, Shoreditch and Stoke Newington. These 3 boroughs were merged to form the London Borough of Hackney in 1965. The first Smoke Control Order was declared by Stoke Newington in March 1958 and covered an area around Green Lanes and Lordship Park. Over the subsequent years, further Smoke Control Areas were declared across all 3 of the Metropolitan boroughs and some were put in place after the creation of the London Borough of Hackney.

The Smoke Control Orders continue to be valid. However, as these Orders were put in place in a piecemeal fashion by different administrative bodies and there have been boundary changes since this time, relying on the information contained within the Schedules to the Orders becomes more difficult. Details of an exemption has also been found which applied to a small area that is believed to have been occupied by commercial premises at the time the Order was made.

Therefore, consolidating the multiple historic Smoke Control Orders into a single boroughwide Order will clarify the area that is covered, and allow for more effective enforcement.

In addition, changes to the legislation brought in by the Environment Act 2021 allows the Smoke Control restrictions to be applied to moored vessels in addition to the fixed chimneys and flues that were previously covered. The process that must be followed by local authorities who want to change a Smoke Control Order to include moored vessels is set out in the legislation and requires a notice to be published followed by a period during which anyone who may be affected can raise objections.

The number of complaints that the Council receives about solid fuel burning is relatively low. However, complaints about emissions from moored vessels have increased over recent years. The reasons for the increase may be a result of increased awareness of the health impacts of air pollution leading to increased reporting. Introducing a new Smoke Control Order which includes moored vessels will provide the Council with extra powers to deal with

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<sup>&</sup>lt;sup>1</sup> Fuel Burning Engagement Project - Final Report, 2021

smoke emissions from these vessels, and thereby ensure that a more effective response is provided where incidences occur.

The Council approved its Air Quality Action Plan in July 2021. The Action Plan includes 47 measures to be delivered between 2021 and 2025 that aim to improve air quality across the borough. Action 15 is to 'Promote and Enforce the Borough's Smoke Control Area'. The proposals to consolidate the historic Smoke Control Orders, and to consult on including moored vessels within the scope, would contribute to delivering this action.

#### 1.2. Who are the main people that will be affected?

Hackney is home to an estimated 259,200 people<sup>2</sup> and c23,000 businesses, with the population likely to grow to 291,555 people by 2030<sup>3</sup>. As the proposal has the potential to improve air quality, it will affect all people spending time in Hackney who will benefit from breathing cleaner air.

The consolidation of the historic Smoke Control Orders is unlikely to impact on many people as the same controls which are already in place with very few exceptions would be put in place by the new boroughwide Order. However, including moored vessels within the scope of the Order would have an effect on those people who moor their boats at pitches within Hackney, as the waterways were not covered by the historic Orders.

The Regulations require the local authority to reimburse 70% of the total costs of upgrading a solid fuel appliance to one which is compliant with the new controls, provided that certain criteria are met. The funding would not be available to the occupant of any residence previously covered by a Smoke Control Order. DEFRA has confirmed that, in England, the reimbursement of costs would only be for those using vessels on the waterways which are covered by a new Order. People with permanent moorings within a Smoke Control Area (SCA) may be entitled to apply for reimbursement from the Council towards the cost of upgrading their solid fuel appliance, subject to certain conditions. These conditions include having the right to moor the vessel at a single mooring place on the day the Smoke Control Order is made which brings vessels into scope, and not having access to a mains electricity or gas supply at the mooring place. Therefore, some of the financial impacts on those affected may be mitigated through funding provided by the Council. However, not all those affected will be eligible to receive the reimbursement costs as many boaters are continuous cruisers and, therefore, do not have a home mooring.

A Census Survey<sup>4</sup> of boaters was conducted by the Canal & River Trust (CRT) in 2022. This provides data on boaters across England and Wales, although data is broken down by region. Hackney does not have data specifically on the people using its waterways but boaters, particularly the continuous cruisers, will move across borough boundaries and, therefore, boaters from outside of Hackney need to be considered.

<sup>&</sup>lt;sup>2</sup> The 2021 Census estimates that Hackney has 106,081 households compared with 101,690 in 2011 which is an increase of 4.02%. This estimate is lower than expected as an estimate of Hackney's households by the ONS in 2020 put the number of households at 114,395 (Ref: <u>Hackney Census 2021 - Briefing 2</u>). See also <u>Hackney Census 2021 - Briefing 1</u>

<sup>&</sup>lt;sup>3</sup> Greater London Authority, 2020

<sup>&</sup>lt;sup>4</sup> Boater Census Survey 2022 Results

A survey of people living on, and using, boats on London's waterways was carried out by the CRT in 2016<sup>5</sup>. The Survey was sent to 3675 boaters who had been identified using the waterways in a 12-month period before the survey and 1323 responses were received. The majority of respondents use the boat as their primary home and most own their home outright. However, 50% of those who responded said that affordability / financial reasons was a motivation for living on a boat.

People who own or reside on vessels, such as narrow boats, are often referred to as bargees and a National Bargee Travellers Association exists to 'represent the interests of all itinerant live aboard boat dwellers'. The CRT survey was carried out among those who used any of London's waterways. However, of those who paid council tax, Hackney had the second highest number of respondents after Hillingdon. The highest number of respondents listed Hackney as the borough where they are registered for voting (11%) and where they are registered with a GP (11.5%).

The following table shows the relevance of the positive or negative impacts of the Smoke Control Order proposal on the following equality strands or protected characteristics groups:

	Age	Disability	Gender reassignme nt	Pregnanc y & Maternity	Marriag e & CP	Rac e	Religi on or belief	Sex	Sexual Orientation
Relevance	High	Low	Low	Low	Low	High	Low	Low	Low

Table 1: Relevance of the impacts on each of the protected groups

#### a) Age (Relevance: High)

Age is defined by reference to a person's age group. An age group can mean people of the same age or people of a range of ages. The Council is committed to promoting equality among people of all ages and valuing the contribution made by all citizens.

Hackney's median age is 32<sup>6</sup>. The median age for England was 40 and for London 35. The largest number of usual residents in Hackney (nearly 50% of the population) are aged from 22 - 45. This is younger than the average for England. Only 8% of the population are aged 65 and over, compared to a national average of 19%.

Evidence on the health impacts of exposure to air pollution has shown that all ages are affected but that older and younger people are more vulnerable. Exposure to air pollution has impacts on the respiratory and cardiovascular systems so the health effects will be more pronounced in those whose lung and heart capacity has been weakened with age or which has not yet fully developed. Air pollution is also associated with degeneration in cognitive ability so has been linked to the onset of dementia.

Air pollution impacts on the young as their organs are still in the development phase. Evidence shows that lung development in children suffering long-term exposure to air pollution is reduced and this, therefore, reduces lung capacity throughout their life. Air pollution can also impact on the foetus resulting in lower birth weights in babies compared to those whose mothers were not exposed to long-term air pollution.

<sup>&</sup>lt;sup>5</sup> Who's on London's Boats Survey, 2016

<sup>&</sup>lt;sup>6</sup>Hackney Census 2021 - Briefing 2

Introducing measures that can help to reduce concentrations of air pollution is likely to benefit everyone but is likely to have a more positive impact on the young and the elderly.

Apart from the positive health benefits, the proposals are expected to have financial impacts on those who have not previously been subject to smoke control regulations and this will be almost entirely those who moor vessels on the waterways within Hackney. Data from the survey carried out by CRT showed that 34% of those living on boats are under the age of 35 with the most popular age group being those between 25 and 34. This age breakdown is largely consistent with the age breakdown for Hackney as a whole but differs from the national average.

Most boaters who responded to the survey live on their own or as part of a cohabiting couple. Although children and elderly are among those using boats on London's waterways, these are a small minority. Only 9 respondents listed Hackney as the borough where their children attended school.

# **b)** Disability (Relevance: Low)

According to the 2021 Census<sup>7</sup> 9.6% of the population of Hackney reported that they were disabled or limited a lot, noting that this figure is age standardised. In the Canal and River Trust 2022 Census Survey, the percentage of boaters reporting that their day-to-day activities are limited by a long-term health problem or disability which has lasted, or is expected to last, at least 12 months was significantly higher. However, in the 2016 CRT survey of boaters using London's waterways, the figure was 10% which is a similar figure to that among the wider population within Hackney.

The figures on disability and health conditions among the itinerant boat dwellers can be difficult to obtain as the people are moving around and will often, therefore, be moored at a distance from the GP where they are registered. This can also create obstacles in terms of their access to health services.

The health impacts from exposure to air pollution may impact more on people with certain disabilities. Therefore, the benefits of cleaner air are more likely to have a positive impact on those living with a disability. It is unlikely that the proposal to include moored vessels within the scope of the Smoke Control Order will impact disproportionately on those with disabilities.

### c) Gender reassignment (Relevance: Low)

Out of the 209,467 usual residents in Hackney aged 16 or over, 187,007 (89.3%)<sup>8</sup> said their gender was the same as the sex registered at birth, 2,241 (1.1%) said their gender was different to their sex registered at birth. Hackney has the highest number and the highest proportion of usual residents who described a nonbinary+ gender identity out of any of the 32 London boroughs.

We do not have data on the numbers of people living on moored vessels within Hackney who have a gender which is different to the sex registered at birth. There are no known differences in the effects of air pollution on different genders so we do not consider that the

<sup>&</sup>lt;sup>7</sup> ONS 2021

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<sup>8</sup> Hackney Census 2021 - Briefing 7

proposal will have any equality impacts on those who have undergone gender reassignment.

### d) Pregnancy and maternity (Relevance: Low)

There were 4,377<sup>9</sup> live births to women in Hackney in 2014. The fertility rate for Hackney is 60.1 live births per 1,000 women of child-bearing age compared to 63.3 in London and 62.2 in England.

Air pollution can impact the foetus, reducing its growth and development. For the pregnant mothers, changes which occur during pregnancy can place additional stress on the cardiovascular and respiratory systems which can make them more susceptible to the effects of exposure to air pollution.

While there are children and pregnant women among those who live on boats and use the waterways in Hackney, the CRT survey data indicates that the numbers are relatively low. As we do not have data on pregnancy rates among the boating community, the assumption is that these will be similar to those of the wider population.

It is considered that the impacts of the proposal are more likely to have a positive impact on pregnancy and maternity by reducing air pollution in the borough.

# e) Marriage and Civil Partnership (Relevance: Low)

In 2021, the percentages for various legal partnership statuses were as follows:  $60\%^{10}$  single (never married or never registered a same-sex civil partnership), 26% married (opposite sex), 0.5% married (same sex), 0.2% in a registered civil partnership (opposite sex), 0.2% in a registered civil partnership (same sex), 3% separated (but still legally married or still legally in a civil partnership), 1.6% divorced or formerly in a civil partnership now legally dissolved, and 3% widowed or surviving partner from a civil partnership.

Only 43% of respondents to the 2016 survey among boaters using London's waterways stated that they were single, while 42% of those who responded said they were part of a cohabiting couple. This latter figure did not differentiate between those who were married, in a civil partnership or living together as a couple. These figures are considerably different to those from the 2022 Census Survey which indicated that, among the boating community across England and Wales, more than 90% were in a marriage or civil partnership.

The proposals may have financial implications for boaters, particularly the continuous cruisers. Having more than one person who is bringing in an income may help with responding to the financial pressures. Although the proposal is not considered to have a significant impact on people based on marital status, as the figures on relationship status differ between the two surveys, further work will be required to engage those using Hackney's waterways who may be financially affected and direct them to appropriate support mechanisms.

#### f) Race (refers to ethnicity) (Relevance: High)

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<sup>9</sup> Hackney Council, 2023

<sup>10</sup> Hackney Census 2021 - Briefing 2

Race refers to the equality group of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

53.1%<sup>11</sup> of Hackney residents identified their ethnicity within the 'White' category. The proportion of the population who identify as 'White' is far below the average for England as a whole (81%). The second most common high-level ethnic group in Hackney is 'Black', with 21.1% of Hackney residents identifying in this category. Hackney has a significantly higher proportion of residents who identify as 'Black' than the average for both London and England where the figures are 13.5% and 4.2% respectively.

The second most common ethnic identity in London and England is 'Asian'. Hackney's Asian population is 10.37% which is significantly less than the average for London (20.7%) but is more in line with the average for England (9.6%).

Ethnic Group	Hackney		Lond	on	England	
	2021	2011	2021	2011	2021	2011
Asian / Asian British	10.4%	10.5%	20.7%	18.5%	9.6%	7.8%
Black / Black British / African / Caribbean	21.1%	23.1%	13.5%	13.3%	4.2%	3.5%
Mixed or multiple ethnic groups	6.7%	6.4%	5.8%	5.0%	3.0%	2.3%
White	53.1%	54.7%	53.8%	59.8%	81.0%	85.4%
Other Ethnic Group	8.7%	5.3%	6.3%	3.4%	2.2%	1.0%

Table 2: Ethnic Groups across Hackney, London, England

People from Black and Global Majority communities may be disproportionately impacted by air quality for a variety of reasons. Pre-existing health inequalities mean that some Black and Global Majority residents have health conditions linked to respiratory and cardiovascular disease which means that they are more likely to be impacted negatively by exposure to air pollution.

Communities that have higher levels of deprivation, or a higher proportion of people from a non-white ethnic background, are more likely to be exposed to higher levels of air pollution. <sup>12</sup> Based on the survey of the boating community, 77% of respondents said that they are white (English, Welsh, Scottish, Northern Irish or British). This figure rises to 89% when 'White Other' is included. This is higher than the percentage of white people within England as a whole. Therefore, based on the data from the 2016 CRT Survey, the proposal to extend the scope of the Smoke Control Order to include moored vessels is more likely to impact those who are white. Once a Notice of the Order is made, there is a period during which objections can be raised. During this time, officers will raise awareness and seek to engage those on vessels in Hackney to provide information that can help to mitigate the impacts.

# g) Religion or belief (Relevance: Low)

<sup>&</sup>lt;sup>11</sup> Hackney Census 2021 - Briefing 5

<sup>&</sup>lt;sup>12</sup> Air Pollution and Inequalities in London: 2019 Update, Oct 2021

Hackney has a considerably higher proportion of Muslims (13.3%) than England as a whole (6.7%) but slightly lower than the London average (15%). Hackney has considerably more people of the Jewish faith (6.7%)<sup>13</sup>, which equates to an estimated 17,426 people, compared with London (1.7%) and England, (0.5%). This community is largely made up of Orthodox, or Charedi Jewish people who mainly live in the North East of the borough.

The survey of people using boats on London's waterways carried out by the Canal and River Trust did not include a question on religion or belief and we do not have data for boaters using Hackney's waterways. However, the proposals have not been identified as having a disproportionate impact on any faith groups.

#### h) Sex (Relevance:Low)

There are proportionally more women living in Hackney than men, 52.2%<sup>14</sup> of the population is female and 47.8% male. The proportion of males under 20 is slightly higher than females, but there are higher proportions of females than males in all age groups over 55 years.

No data has been found to suggest that these proportions differ among the boating community and these statistics were not included in the survey by CRT.

#### i) Sexual orientation (Relevance: Low)

Sexual orientation is defined as whether a person's sexual attraction is towards the opposite sex, their own sex or to both sexes. Out of a total of 209,467 usual residents in Hackney aged 16 or over, 166,695 people (79.6%)<sup>15</sup> identified as straight or heterosexual and 16,388 people (7.8%) identified as Lesbian, Gay, Bisexual or as another orientation (LGB+). 13% chose not to answer the question. (Hackney Census Briefing 7, 2021)

No data has been found to suggest that these proportions differ among those living on boats and these statistics for boat users were not included in the survey by CRT.

#### **STEP 2: ANALYSING THE ISSUES**

## 2. Information and consultation used to inform decision making.

#### 2.1. DEFRA Guidance

The Environment Act 2021, which received Royal Assent in November 2021, brought in changes which affect the way in which local authorities can control emissions of smoke from solid fuel burning. One of the changes was to allow local authorities to include moored vessels within the scope of a Smoke Control Order for the first time.

As this was a change to existing regulations, DEFRA have since issued guidance for local authorities on the Application of Smoke Control Areas to Moored Vessels<sup>16</sup> and on Creating, Changing, or Cancelling a Smoke Control Order<sup>17</sup>. The guidance also sets out recommendations for consulting with groups and details of the eligibility criteria for receiving

<sup>&</sup>lt;sup>13</sup> Hackney Census 2021 - Briefing 5

<sup>14</sup> Hackney Census 2021 - Briefing 1

<sup>15</sup> Hackney Census 2021 - Briefing 7

<sup>&</sup>lt;sup>16</sup> Guidance on the Application of Smoke Control Areas to Moored Vessels

<sup>&</sup>lt;sup>17</sup> Guidance on Creating, Changing, or Cancelling a Smoke Control Order

financial assistance. Reference to this guidance has been made to inform the approach that Hackney is proposing.

# 2.2. Solid Fuel Burning Working Group

Hackney is one of the London boroughs which is represented on the Solid Fuel Burning Working Group. This is a forum for discussion of the issues, legislation and guidance relating to solid fuel burning and the means for controlling emissions from this source. The Group has also been involved in developing and running campaigns to raise awareness and drive behaviour change on the issue.

The changes to the legislation introduced by the Environment Act 2021 and the subsequent guidance issued by DEFRA have been discussed by members of the group to share knowledge and ideas on its implementation.

#### 2.3. Engagement

As set out in the DEFRA guidance, the changes to the Smoke Control Order require a notice to be advertised and a subsequent period of time then provided during which people can raise an objection. Therefore should approval be granted to proceed with the proposals, a draft Order will be advertised and a process of engagement will be carried out to raise awareness of its contents.

Guidance has been issued by DEFRA which recommends steps to be taken to raise awareness of the changes and the implications for those who may be affected. Where the change is to include moored vessels within the scope of the Smoke Control Order, as is being proposed, particular efforts should be made to reach out to the boating community.

Hackney's Team Manager for Travellers has been consulted as there are ad hoc opportunities for her to engage with people using boats on Hackney's waterways. A joint visit with officers from the Land, Water, Air Team has already been undertaken to help understand the number of vessels using the waterway and to engage in face-to-face conversation with boaters. As many vessels were unoccupied during the daytime, this highlighted the need to carry out visits at various days and times to increase the potential reach.

Officers from the Land Water Air Team have been working with the neighbouring boroughs of Tower Hamlets and Newham as well as the CRT on a campaign to raise awareness of the impacts of solid fuel burning among the boating community. A <u>leaflet</u> providing advice to boaters on reducing emissions from solid fuel burning has already been developed and is available on the Hackney website. The Land Water Air Team has also established contact with Canals in Hackney Users Group (CHUG) which is a community charity whose members are those who use Hackney's canals.

#### 2.4. Other sources of information

The proposals will have the greatest impact on those who use or live on vessels on Hackney's waterways. In order to assess the equality impacts, research was carried out to gather information on the demographics of the boating community. There is limited data available which relates specifically to this group of people. However, a Census Survey was carried out across England and Wales by CRT in 2022. More specifically for Hackney, a

survey was conducted by CRT in 2016 among people using London's waterways and which contains useful data on age, relationship status, disability and ethnicity.

# 2.5. Equality Impacts - Identifying the impacts

The equality groups that are included in this evidence base are the 'protected characteristics' as set out under the Equality Act:

- Age;
- Disability;
- Gender reassignment;
- Pregnancy and maternity;
- Marriage and Civil Partnership;
- Race (this evidence base refers to ethnicity);
- Religion or belief;
- Sex;
- Sexual orientation.

# 2.5.1 What positive impact could there be overall, on different equality groups, and on cohesion and good relations?

The proposals are aimed at controlling emissions to air from solid fuel burning which will have benefits for air quality and, therefore, public health. Therefore, the positive impact will be on all people who live, work and visit the London Borough of Hackney. As solid fuel burning also contributes to poor indoor air quality, those who burn solid fuel and are required to make changes to comply, will, themselves, benefit from a healthier indoor environment.

The proposals aim to ensure that the same controls on solid fuel burning apply across the borough and to people who live in both fixed premises and on the waterways.

# 2.5.2 What negative impact could there be overall, on different equality groups, and on cohesion and good relations?

As the London Borough of Hackney has been a Smoke Control Area for over fifty years, the smoke control regulations have applied to most residences for a long time and people should be familiar with the requirements. The proposals will, however, extend the controls to vessels using the borough's waterways for the first time.

People using the borough's waterways will do so for a variety of reasons and not all will live on the boats. Of those who do live on boats, there is a further distinction between those who have permanent or 'home' moorings and those who do not. Those without a home mooring are continuous cruisers who are only able to moor in the same place for a limited time before continuing their journey. Bargees are not an underrepresented ethnic group and are not defined as a protected characteristic under the Equality Act. However, many bargees are required to keep moving and this nomadic lifestyle means that they can face similar challenges to those faced by Travellers who move around on land. These challenges can include reduced access to healthcare facilities so that data on the health needs of itinerant boat dwellers is more difficult to ascertain. Health conditions and hidden disabilities can, therefore, be overlooked among this group.

Bargees are expected to be those most impacted by the proposals. Those who have a permanent mooring in Hackney will receive financial support but the legislation does not require the local authority to provide financial support to continuous cruisers. The proposals may be perceived to be unfairly targeting those who have chosen to live on the water and, particularly, those who are required to keep moving. While the regulations do not require it, efforts to provide support to this group of boaters should be made.

The data shows that many of the people using vessels on the waterways are under the age of 35. This may be connected to lower incomes and a lack of affordable housing being available. However, the age profile of the boaters is not significantly different from that for the whole of the London Borough of Hackney.

#### **STEP 3: REACHING YOUR DECISION**

### 3.1. Describe the recommended decision

Having due regard to the need to advance equality of opportunity involves considering the need to:

- Remove or minimise disadvantages suffered by people due to their protected characteristics:
- Meet the needs of people with protected characteristics; and
- Encourage people with protected characteristics to participate in public life or in other activities where their participation is low.

The implementation of the changes to the borough's Smoke Control Orders should pay due regard to the equality considerations highlighted in this assessment, to ensure that the Council is compliant with its statutory obligations under the Equality Act 2010.

The impact on all protected characteristics to continue to be considered during the period of consultation following the advertising of the Notice. Additional steps will need to be taken to liaise with the boating community, to make them aware of the implications of the regulatory changes and to listen to their feedback.

The availability of financial support for achieving compliance to be promoted to ensure that anyone who is eligible has access to the funding to which they are entitled. Hackney will look to support campaigns to ensure that itinerant boat dwellers with continuous cruiser licences can access support schemes so that we are championing their needs and ensuring that they are not disproportionately affected.

# STEP 4 DELIVERY: MAXIMISING BENEFITS AND MANAGING RISKS

# 4.1. Equality and Cohesion Action Planning

No	Objective	Actions	Outcomes highlighting how these will be monitored	Timescales / Milestones	Lead Officer
1	Prioritise protected groups likely to be affected	Follow guidance for consultation taking the additional steps recommended for wider engagement.	Range of deliberative engagement methods	Subject to approval, the Notice will be advertised in March 2024. Views and feedback will be gathered for following the final appearance of the Notice in the press. The time period for objections has been extended to 3 months to take account of it coinciding with an election period.	Land, Water, Air Manager
2	Ensure the needs of protected groups are considered	Take steps to actively engage with the boating community. Seek feedback and respond to points raised.	Responses to engagement and take-up rate of reimbursement offered	Engagement and awareness-raising for 13 weeks following the final appearance of the Notice in the press. The Order will come into force 6 months after confirmation by the Secretary of State which is estimated to be at the end of February 2025. Funding will be sought from DEFRA (May 2024) to help the Council with costs. Funding for a project to engage boaters has been submitted to the Mayor of London.	Land, Water, Air Manager
		Take steps to identify additional support and/or funding opportunities for itinerant boat dwellers not eligible to receive the 70% financial contribution	Funding opportunities identified; Take-up rate of financial support and other support mechanisms	Seek funding opportunities and provide these to run alongside the DEFRA funding.	Land, Water, Air Manager