

Appendix 2 - Climate Change Supplementary Planning Document Full Equality Impact Analysis

(Note: the Equality Impact Analysis contained herein is referred to as EQIA, and not EIA for the purposes of this report. This is to avoid confusion with Environmental Impact Assessments, which are known as EIA in planning terms.)

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2023 Q3
Name and details of policy, strategy, function, project, activity, or programme	<p>The purpose of this Supplementary Planning Document is to provide supplementary guidance for the planning policies contained in the council’s Local Plan that relate to climate change and to help implement the actions contained in the council’s climate change strategy.</p> <p>The SPD establishes more detailed guidance for developers, landowners, homeowners, planning officers, and other interested parties when preparing and assessing planning applications. The guidance applies to new build homes, extensions and retrofitting of homes, non-domestic and mixed-use developments.</p> <p>The main areas covered in the SPD include sustainable design and construction, flooding, water efficiency, air quality, energy, ecology, waste, and transport and travel.</p> <p>The SPD as all supplementary planning documents, does not propose new policy but strengthens the ability to achieve the Local Plan’s objectives guiding planning applications that will come forward. As the SPD draws upon policies in the Local Plan and principles in the Planning Guidance SPD, it should be read in conjunction with these policy documents.</p>
Lead Officer	<p>Name: Eleonora Tafuro Position: Planning officer, Policy & Spatial Planning Team, Economic Department Email: localplan@lbhf.gov.uk</p>
Date of completion of final EQIA	August 2023

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing: This Equality Impact Analysis (EQIA) supports the Supplementary Planning Document</p> <p>Resources: Officer time</p> <p>Lead Officer: David Gawthorpe, Team Leader Development Planning Team</p>
What is the policy, strategy, function, project, activity, or programme looking to achieve?	<p>The key aim of this Supplementary Planning Document is to implement the Council's vision to meet net zero greenhouse gas emissions by 2030 at borough level. This will be achieved by:</p> <ul style="list-style-type: none"> • Making H&F a net zero-carbon organisation. • Promoting reduction and re-use as well as recycling to achieve Borough's targets on household waste and recycling; • taking action on air quality issues; • Working with partners to ensure the environmental quality of open spaces is of the highest quality including the promotion of biodiversity; • promoting pedestrian-friendly and cycle -friendly network; . <p>As a result, this SPD will address sustainability and climate change issues and will guide development towards a more sustainable future in which human activity works to the benefit of all people and the environment as well as a thriving local green economy.</p>

Section 03	Analysis of relevant data and/or undertake research
Documents and data reviewed	<p>The following documents and data have been used to help inform this Equality Impact Analysis:</p> <p>Equalities Plan 2021-25 The Council's Equality Plan 2021-2025 sets out the Council's vision for tackling inequality and responding to the public sector equality duty. The document draws on five objectives:</p> <ol style="list-style-type: none"> 1. Everyone in our borough must feel valued when the Covid-19 pandemic ends. 2. Removing barriers to inclusion. 3. Ensuring that our services tackle the disproportionate impact on young people of the risks of street crime and exploitation by gangs. 4. Improving opportunities for all.

5. Becoming an employer of choice and fostering greater inclusion

Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-2021

Hammersmith & Fulham Joint Health and Wellbeing Strategy 2016-2021 sets out an ambitious vision for improving the health and wellbeing of people in the borough and securing a sustainable system for the future. The strategy is for a people-centred health and social care system that supports communities to stay well, consistently providing the high quality care and support the most vulnerable people in the community. This includes tackling health inequalities within our communities, overcoming high levels of child poverty and child obesity and severe mental illness in the country. the strategy is therefore considered to be compliant with the statutory codes in relation to equalities characteristics.

Census 2021

The 2021 Census describes the resident population of the UK and its constituent countries, by age and sex, and provides information on how the population has changed over time.

Data source: [[Hammersmith and Fulham population change, Census 2021 – ONS. Hammersmith and Fulham census population profile - 1981 to 2021 \(bothness.github.io\)](#)]

Office for National Statistics (ONS)

The office for National Statistics provides statistics on population as the most up to date data collected from the Census 2021.

Greater London Authority (GLA) projections 2018 and 2020

The trend-based projections 2020 is the most recent set of projections released in September 2021 by the Greater London Authority (GLA).

Demographics of Equality Target Groups

A summary of the demographic situation in relation to each of the equality groups is given below. This provides a starting point for the analysis of likely impacts of Article 4 Direction on these groups.

Population

Most local authorities experienced population increases between 2011 and 2021, although in some areas the population decreased. In Hammersmith and Fulham the population size has increased slightly from around 182,500 in 2011 to 183,295 in 2021. This was an increase of 0.4% since 2011. The increase is lower than the increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800 and lower than the increase for London (7.7%) - Census 2021.

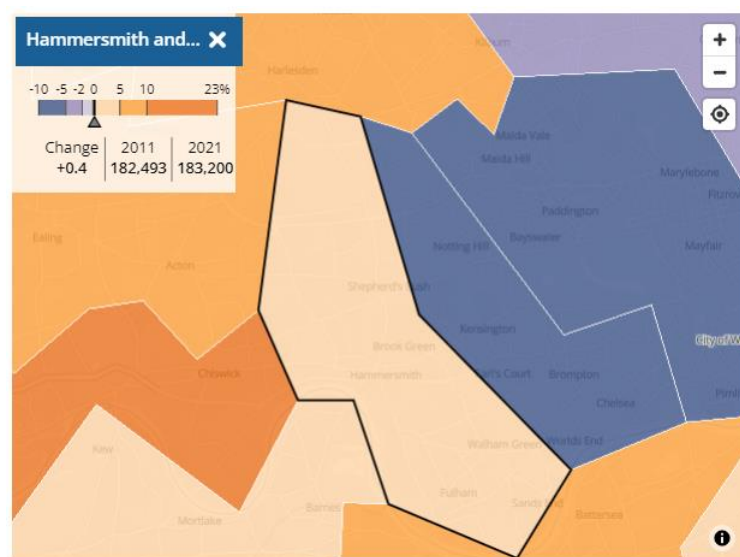
The largest decrease was recorded in the 0-4 age group 23.7%, while the elderly population has increased by 15.7% (London +15.3% and England +20.1%).

H&F is also more diverse than 10 years ago, with 46% of the population born outside of the UK (London 41%), an increase from 43% in 2011 with most residents coming from Italy, France, the US, and Spain.

In 2021, Hammersmith and Fulham ranked 107th for total population out of 309 local authority areas in England, which is a fall of eight places in a decade.

Hammersmith and Fulham covers an area of 16 square kilometres (6 square miles) and has a population density of 11,178 people per square kilometre (km²), based on the latest population estimates taken in mid-2021 (ONS). As of 2021, Hammersmith and Fulham is the sixth most densely populated of London's 33 local authority areas.

Figure 1: Population change between 2011 and 2021 in Hammersmith and Fulham



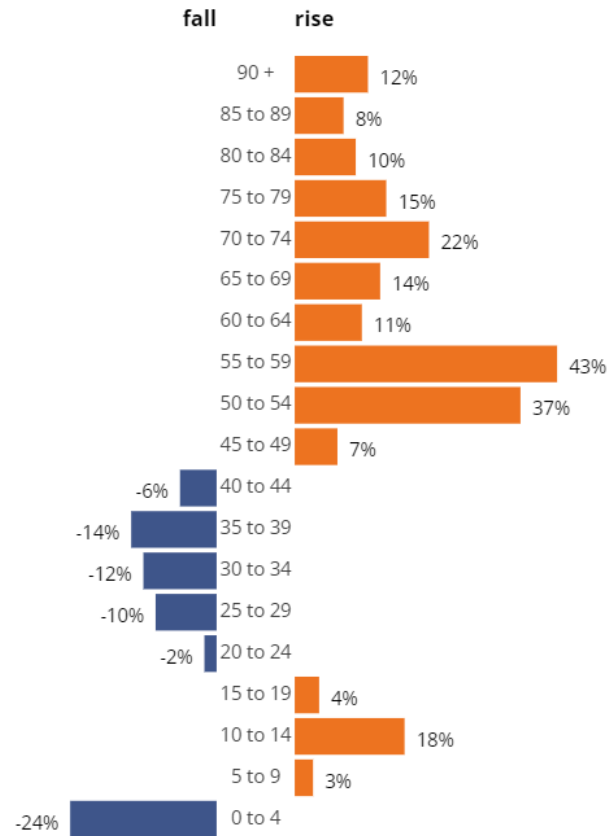
Source: Official National Statistics – Census 2021

Age

In the Census 2011, the largest age group in London was those aged 25 to 29 years. More recently, in 2021, the largest age group in London was those aged 30 to 34 years. Overall, in England, there has been an increase of 20.1% in people aged 65 years and over, an increase of 3.6% in people aged 15 to 64 years, and an increase of

5.0% in children aged under 15 years (Census 2021). In Hammersmith and Fulham there has been an increase of 15.2% in people aged 65 years and over, a decrease of 0.5% in people aged 15 to 64 years, and a decrease of 4.2% in children aged under 15 years.

Figure 2: Population change (%) by age group in Hammersmith and Fulham, 2011 to 2021



Source: ONS Census 2021

It has been estimated that while there will be growth in the borough's population in all age groups, the main growth will occur for people aged 84 and over. The population in that age group is expected to increase by 1,273 by 2031, equivalent to 42.8%. The population aged 64-83 is expected to grow by 33.9% during the same period and population aged 50 to 63 to grow by 13.3%. This trend is reflected similarly in London with 37.7% and 33% of increase respectively for people aged 64-83 and over.

Figure 3: Age and Sex structure in Hammersmith and Fulham

183,544 people in 2020

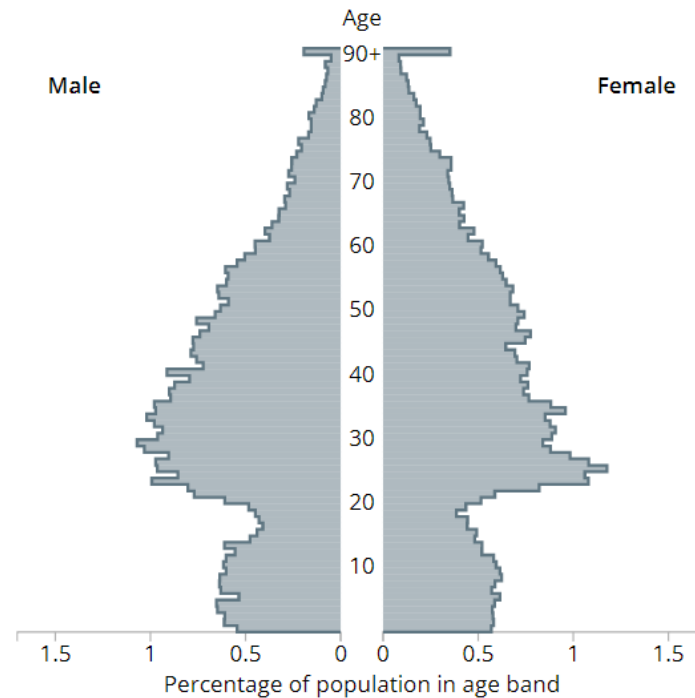
All ages

90,972 males

92,572 females

49.6%

50.4%



Source: Office for National Statistics, Population age and sex structure, 2020

Gender

The Census 2021 has reported a higher percentage of female (53%) in the borough than males (47%). This figure has slightly changed throughout the years in terms of percentage of female against males since Census 2011 where females were (51.3%) and males (48.7%). Overall, the percentage of females in the borough has been higher than males.

Hammersmith and Fulham's age structure shows the working-age population to be 137,402 which is 75.0% of the population. People under the age of 16 represent 14.6% of the population, and over 65s represent 10.4% of the population.

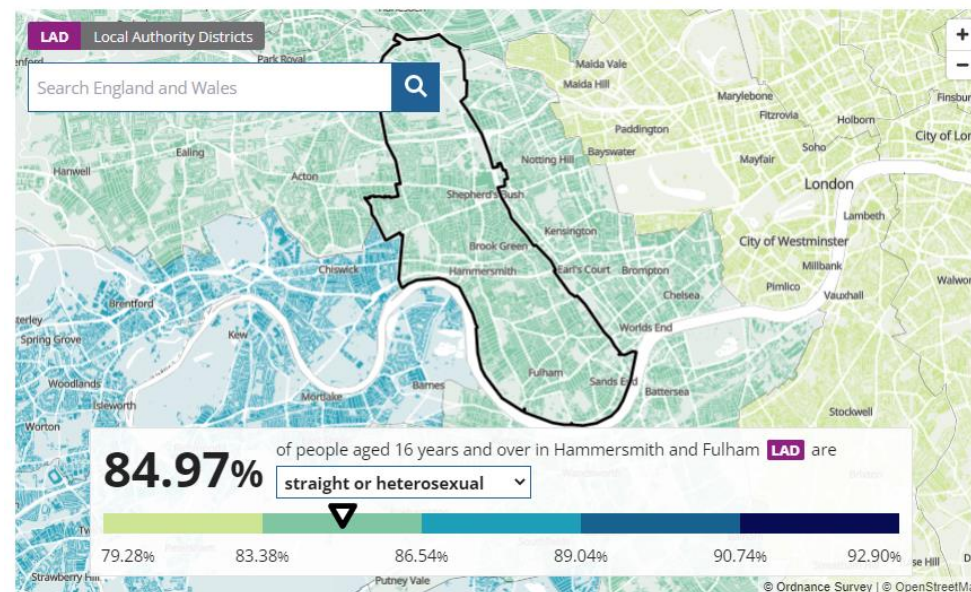
For commentary regarding transgendered or transitioning people, see 'sexual orientation (and transgender)' below. For the assessment of policies, transgendered or transitioning people are represented in the gender category (see section 05).

Sexual Orientation (and transgender)

The nature of issues facing LGB people can be similar to transgendered or transitioning people as well, hence the council often use the term LGBT (lesbian, gay, bisexual and transgender). Data published by the Office for National Statistics (ONS) revealed that in 2019 4.5% of London's population were LGBT.

The 2021 Census included the question on sexual orientation which was voluntary and only asked of people aged 16 years and over. Based on the percentage of people who provided an answer, in London, 2.2% described their sexual orientation as gay or lesbian, 1.5% described their sexual orientation as bisexual, and 0.5% wrote in a different orientation. Hammersmith and Fulham has a majority of heterosexual population (84.97%), gay or lesbian account for 3.12%, bisexual (1.76%) and other orientation (0.43%).

Figure 4: Sexual orientation, 2021, local authorities in England

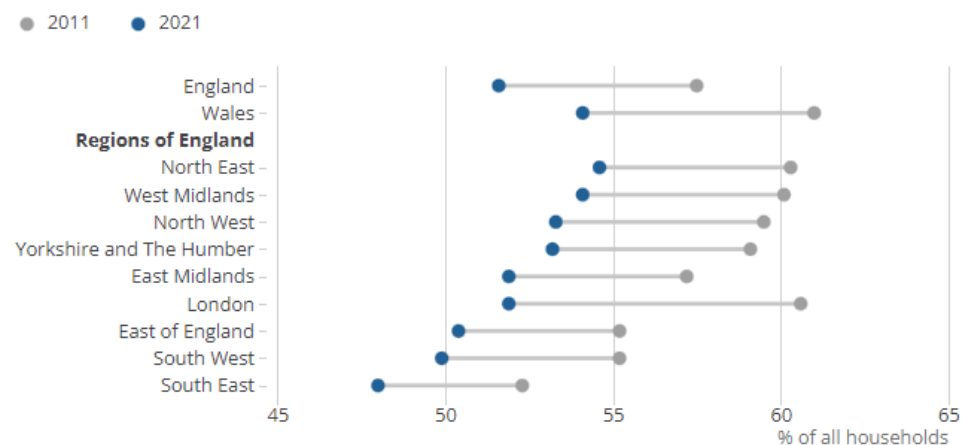


Deprivation

Households in England were classified in terms of dimensions of deprivation, based on selected household characteristics. Households were considered to be deprived if they met one of the following four dimensions of deprivation:

- employment: where any member of a household, who is not a full-time student, is either unemployed or economically inactive due to long-term sickness or disability.
- education: no person in the household has at least five or more GCSE passes or equivalent qualifications, and no person aged 16 to 18 years is a full-time student
- health and disability: any person in the household has general health that is “bad” or “very bad” or is identified as disabled
- housing: the household’s accommodation is either overcrowded or is in a shared dwelling, or has no central heating

Figure 5: Households deprived in at least one dimension, 2011 and 2021, England, Wales and regions of England



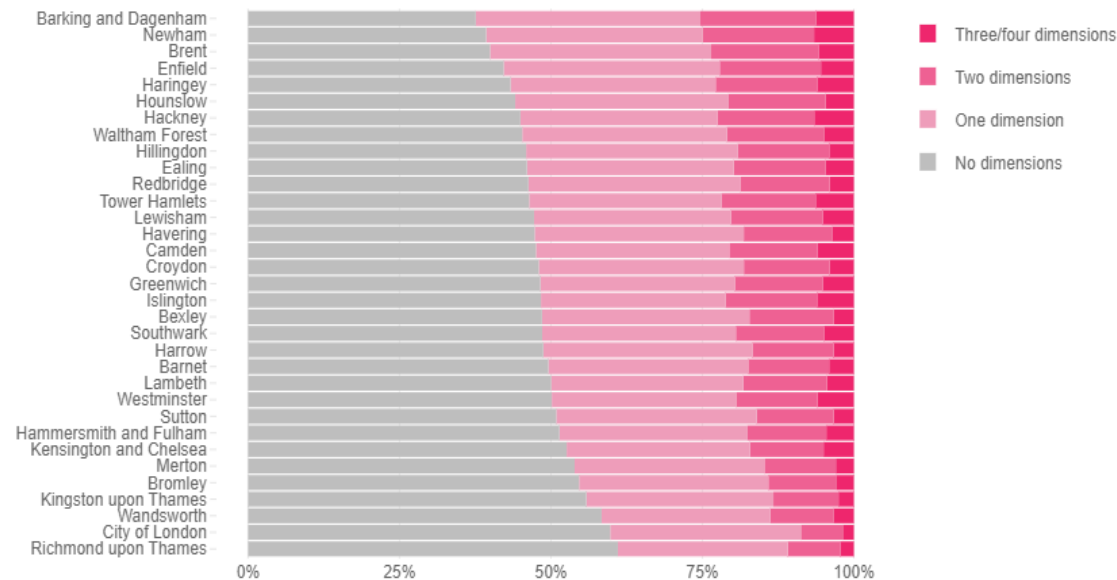
Source: Office for National Statistics – Census 2021

The 2021 Census reported a general improvement on health, as per Hammersmith and Fulham 53.8% of the residents stated that health has been improved since 2011.

Overall, London’s pattern of household deprivation is very close to the rest of England, with just over half of all households deprived on at least one dimension. The proportion of households not deprived in any dimensions increased between 2011 and 2021, with this increase clearly greater for London than for other regions. London remains the region with the highest proportion of households deprived in all four dimensions. Even though that proportion is small (0.4 per cent), it still represents more than 13,000 households in London showing all aspects of deprivation. London boroughs have both the highest proportion of households deprived on at least one dimension (Barking & Dagenham, Newham and Brent) and among the very lowest (Richmond upon Thames) of any local authorities in England. At ward level, concentrations of deprived households are even more obvious, with more than one in ten households showing at least three of the four dimensions of deprivation in seven wards from Westminster, Kensington & Chelsea, Camden and Enfield.

Hammersmith and Fulham reported 51.3% of household not deprived in any dimension, 31% of household deprivation in one dimension and 4.5% of household deprived in three or four dimensions. (GLA Census 2021 Reports, available at: [Census 2021 Reports \(london.gov.uk\)](https://www.london.gov.uk/press-releases/major/census-2021)).

Figure 6: Households deprivation by borough, 2021



Source: GLA Report Census 2021 – household deprivation

At ward level, average dimensions of deprivation in Hammersmith and Fulham were highest (between 0.9-0.97) in the northern part of the borough (College Park & Old Oak, White City and Shepherd's Bush Green) and lowest (0.48-0.5) in the south (Parsons Green 7 Sandford and Fulham Town).

Four wards in London had 1.4 per cent of households derived on all four dimensions, two in Westminster (Church Street and Westbourne) and two in Camden (St Pancras & Somers Town and Kilburn), though seven other boroughs include wards with at least one in a hundred households deprived in all four dimensions. Those are Haringey, Hammersmith & Fulham, Kensington & Chelsea, Hackney, Barnet, Enfield and Brent [[Census 2021 Reports \(london.gov.uk\)](https://www.london.gov.uk/press-releases/major/census-2021-reports)].

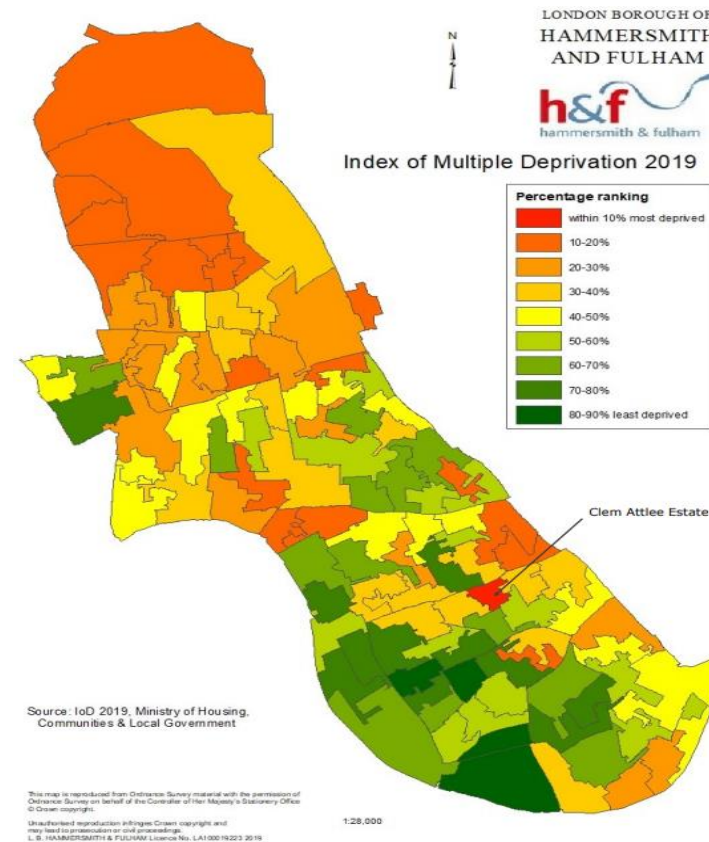
Map 1: Map of average deprivation, London wards, 2021



Source: 2021 Census, ONS, GLA survey

According to the 2019 Indices of Deprivation (IoD), Hammersmith and Fulham was ranked 112 out of 317 local authority area in the country (91 in 2015). Of the 113 Lower Super Output Areas (LSOAs) one (0.9%) is in the most deprived 10% nationally (Clem Attlee estate). Most of the areas in the north of the borough are in LSOAs 10-20% worst nationally.

Figure 7: Index of Deprivation in Hammersmith and Fulham



Source: Deprivation in Hammersmith and Fulham | LBHF, 2019

Hammersmith and Fulham not only has high levels of deprivation, it is polarised socially and economically. In the context of London this is demonstrated by the fact that the borough has some wards that have the highest and lowest rankings for the levels of income. Palace Riverside appears in the rankings as having the one of the highest income ranks as well as highest Index of multiple deprivation ranks. On the contrary Wormholt and White City has statistically the one of the lowest income ranks and lowest index of multiple deprivation ranks. The above image shows this effectively, with the brighter orange colours signifying parts of the borough which have high deprivation levels and conversely the brighter green areas showing low levels of deprivation.

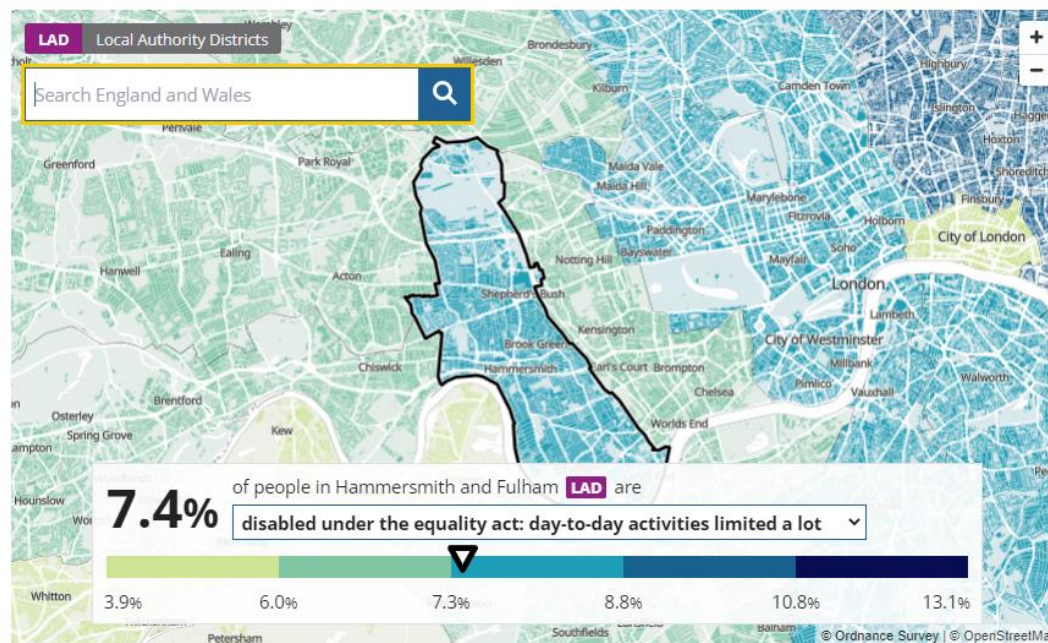
Deprivation and low household incomes also impact on health inequalities and result in high levels of child poverty. About 20% of people are in poverty in Hammersmith and Fulham compared to 32% of children in poverty. Childhood

poverty in Hammersmith and Fulham does not follow the general north-south divide but is more scattered geographically across the borough.

Disability

Overall, the portion of disabled people across England and Wales has fallen from 19.3% in 2011 to 17.7% in 2021. Figures from 2021 Census show 22,972 people in Hammersmith and Fulham have a physical or mental impairment, which account to 15.5% of the area's population. Of these people, 12,865 (8.1%) said their disability stopped them from carrying out regular activities 'a little', while 10,107 (7.4%) said it did so 'a lot'.

Figure 8: Disability (age-standardised), 2021 in Hammersmith and Fulham



Source: ONS, 2021 Census [[Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)]

Race

According to the latest 2021 Census, Hammersmith, and Fulham remains ethnically diverse and saw a 6.6% increase in people who are from an ethnic group other than White British (61.7%). Despite this ethnic diversity, 7 in

	<p>10 people still identify with a UK national identity. The main ethnic minorities identified are Black African (7.2%), Mixed (6.7%), Black Caribbean (3.6%), and Arab (3%).</p> <p>Religion The most populous religious group within Hammersmith and Fulham is Christian (45.7%). This figure has decreased (8.4%) from 2011. The next most common religious group is Muslim (11.6%,) with a population of 21,290, up from 10% in 2011. These trends are similar to London and England as a whole.</p>
New research	N/A

Section 04	Undertake and analyse consultation
Consultation	A public consultation began on 20 th of April 2023 and was carried out for seven weeks in accordance with the consultation requirements of regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
Analysis	<p>Methodology of the Analysis & Protected characteristics and the Public Sector Equality Duties PSED)</p> <p>This EqIA analyses the likely impacts of the Supplementary Planning Document on statutorily identified protected characteristics (age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race, religion/belief, sex, and sexual orientation), human rights and children’s rights. It also assesses the SPD principles against the Public Sector Equality Duties in s149 of the Equality Act 2010 which states that in the exercise of its functions the council must have due regard to the need to:</p> <ul style="list-style-type: none"> ▪ eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act; ▪ advance equality of opportunity between people who share a protected characteristic and those who do not; and ▪ foster good relations between people who share a protected characteristic and those who do not.

The relevance of the policies to the protected characteristics is categorised as:

- High (H)
- Medium (M)
- Low (L)
- Not Applicable (NA)

and the magnitude of the impact on the protected characteristics are categorised as:

- Positive (+),
- Negative (-)
- Neutral (blank)

The SPD sets out key principles that should be applied to any development within the borough. The chapters contained in the SPD are the followings:

- Net zero Carbon Buildings
- Building Form and Fabric
- Site and Orientation
- Ventilation and Overheating
- Renewable Energy and Low Carbon Heating
- Embodied Carbon
- Water efficiency
- Transport and movement
- Air quality
- Ecology, Biodiversity and Green Infrastructure
- Flooding and Sustainable Drainage
- Sustainable Waste Management
- Heritage and Conservation

The analysis of the impacts has been broken down by chapters whereby key principles have been set out. The impacts have been assessed against the protected characteristics as follows. Commentary has been provided for each topic area and related principles, in relation to the way in which the SPD is likely to impact upon the protected characteristics:

	<ol style="list-style-type: none"> 1. Age 2. Disability 3. Gender reassignment 4. Marriage/ Civil Partnership 5. Pregnancy/ Maternity 6. Race 7. Religion/Belief 8. Sex 9. Sexual Orientation 10. Human/ Children's Rights Act
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Section 05		Analysis of impact and outcomes										
Analysis	Topic	Age	Disability	Gender Reassignment	Marriage/Civil Partnership	Pregnancy/Maternity	Race	Religion/Belief	Sex	Sexual Orientation	Human/Children's rights	Commentary
		Net Zero Carbon and building form and fabric	H+	H+	N/A	N/A	M+	N/A	N/A	N/A	N/A	L

												overheating and increase provision of natural light and ventilation would have positive effects on age group, children, and elderly people as well as those with impairments, such as those suffering from breathing diseases and mental health disorders.
	Site and orientation	H+	H+	N/A	N/A	M+	N/A	N/A	N/A	N/A	L	<p>This section provides recommendations on the orientation of buildings for a better exposure to natural light and opportunities for installation of PV panels. Building orientation would be a key aspect for their best performance.</p> <p>The principles set out here would help achieve an improved and healthier internal environment for all. These principles will positively impact on people of working age, people with impairments, children, elders, and women with little children.</p>
	Ventilation and overheating	H+	H+	N/A	N/A	M+	N/A	N/A	N/A	N/A	M	The implementation of these key principles will generally improve people's life, their health and wellbeing and more widely will comply with human rights and its right to live. But especially these principles will have a positive impact on those people with mental

												health disorders and breathing diseases (such as asthma).
	Low carbon heating and renewable energy	H+	H+	N/A	N/A	M	N/A	N/A	N/A	N/A	L	<p>The principles set out in this chapter are likely to have beneficial impacts on people's health, particularly on those with impairments and children.</p> <p>Furthermore, these measures will have great benefits in terms of social wellbeing by helping people with lower income saving costs from energy bills.</p> <p>More broadly, the engagement of different stakeholders in construction/delivery of developments would promote job opportunities in the innovation sector and sustainable energy and therefore may support existing and future employment and opportunities for anyone including those with protected characteristics.</p>
	Embodied carbon	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	The measures set out in this chapter will not directly impact on any of the protected characteristics.

	Water efficiency	M	M+	N/A	N/A	N/A	N/A	N/A	N/A	N/A	M+	These key principles promote the efficient use of water, which is a scarce resource. These measures can provide benefits in terms of health and social wellbeing by helping people reduce costs associated with their water bills.
	Transport and movement	H+	H+	N/A	N/A	H+	N/A	N/A	N/A	N/A	M+	<p>Promoting sustainable ways of transport is of high relevance to and will benefit all people but especially people who are unable to drive and are comparatively less mobile such as the young, the elderly, the disabled and potentially pregnant women and those with very young children.</p> <p>The key principles focus on improving connectivity of existing and future public transport, walking and cycling routes and achieving high quality public realm, well designed, safe and accessible to everyone. This will encourage active travel, use of public transport, walking and cycling for school travel or local short journeys. A more attractive public realm, will implement the Healthy Street approach (TfL strategy) that will improve air quality, reduce congestion and help make communities greener, healthier and more attractive places to</p>

												live, work, play and do business.
	Air quality	H+	H+	N/A	N/A	H+	N/A	N/A	N/A	N/A	H+	<p>The introduction of these principles will generally help improving the health of people and residents in H&F by reducing the levels of pollution such as NO2 and Particulates, meeting clean air objectives and helping create healthier places.</p> <p>The key principles will benefit some of the protected characteristics such as age – children, young and elderly people - pregnant women and women with little children. They will also help those with breathing diseases and other disabilities.</p>
	Ecology, biodiversity and green infrastructure	H+	M+	N/A	N/A	M+	N/A	N/A	N/A	N/A	L+	<p>These principles are relevant to and will positively impact on people of all ages but especially children and young people. Elderly and disabled people will also benefit from having close access to green spaces which can offer both active and passive recreation opportunities.</p> <p>The implementation of these measures will benefit air quality, overheating, sustainable drainage. People with mental health illness will benefit from this.</p>

	Flooding and sustainable drainage	H+	H+	N/A	N/A	H+	N/A	N/A	N/A	N/A	H	<p>The key principles will especially benefit people who are comparatively less mobile such as the young, the elderly, the disabled and potentially pregnant women and those with very young children.</p> <p>The measures will ensure buildings are more resilient to flood impacts and will reduce the risks of flooding.</p>
	Sustainable waste management	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<p>The key principles will not generally impact on any of the protected characteristics.</p> <p>However, an efficient and sustainable waste management may have positive social impacts on deprived communities that are the most vulnerable to the potential negative effects to the proximity to waste facilities. Deprived population living near to waste sites is the one that would benefit the most in terms of health.</p>

	Heritage and conservation	L+	L+	N/A	N/A	L+	N/A	N/A	N/A	N/A	N/A	<p>This chapter includes guidance and considerations on heritage and conservation. The key principles focus on two areas of risks which should be considered when upgrading older buildings to improve their environmental performance.</p> <p>This section of the SPD sets out options that can be applied when retrofitting heritage properties. In adapting those properties regard should be given to principles of accessible and inclusive design which would be of high relevance to and will have a high impact upon on young children and elderly, disabled people and pregnant mothers and people with very young children.</p> <p>There will be no adverse impact on the protected characteristics but positive outcomes and improvements for all groups in terms of health and accessibility.</p>
	<p><u>Human Rights and Children’s Rights</u></p> <p>The Principles in the SPD will not affect Human Rights as defined by the Human Rights Act 1998 nor Children’s Rights, as defined by the UNCRC 1992.</p> <p>The implementation of the SPD through consideration and determination of planning applications is unlikely to adversely impact upon Human and Children’s rights.</p>											

Section 06	Reducing any adverse impacts
Outcome of Analysis	<p>The equalities impact analysis of the proposed SPD has found that in general, there is unlikely to be any potential unlawful discrimination against protected groups associated with the implementation of these policies. However, the council welcomes comments from the public and other stakeholders on the findings of this equalities impact analysis.</p> <p>The analysis has shown that any protected characteristics will be impacted upon in a similar manner by the implementation of the SPD. On the contrary, the analysis has revealed that, generally, the SPD will have a POSITIVE or NEUTRAL impact upon all protected groups and characteristics and will have benefits in terms of people’s health and wellbeing.</p> <p>The protected characteristics of Age, Disability, Pregnancy and Maternity will be positively impacted upon most by the implementation of the SPD.</p> <p>The council will take the following actions to promote its equalities duties:</p> <ul style="list-style-type: none"> • it will monitor the implementation of the SPD on an ongoing basis to avoid any issues that may adversely impact on the protected characteristics. The relevant SPD key principles may then be amended accordingly, through a statutory review process, to help resolve these issues. • it will undertake public consultation on the Supplementary planning Document and associated documents, including the EQIA. The consultation will provide people with an opportunity to comment on the SPD evidence. • it will monitor the development of equalities legislation and associated case law to help ensure that the SPD remains legally compliant. <p>It is considered the SPD will have a NEUTRAL or POSITIVE impact on human rights as defined by the Human Rights Act 1998.</p> <p>It is considered that the SPD will have a NEUTRAL or POSITIVE impact on children’s rights under the United Nations Convention on the Rights of the Child (UNCRC), including the following:</p> <ul style="list-style-type: none"> • The right to life, survival and development • Health and welfare rights, including rights for disabled children, the right to health and health care, and social security and • The right to education, leisure, culture and the arts

Section 07	Action Plan					
Action Plan	Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
	Ensure that the SPD remains legally compliant with respect to equalities matters	Monitoring emerging equalities related case law and any future legislative amendments.	Ongoing	To be confirmed	The SPD will continue to remain legally compliant with respect to equalities matters.	N/A
	Ensuring that the plan making process promotes the Council's commitment to the involvement of people (including those with protected characteristics) in decision making.	Ensuring that adequate consultation is carried throughout the plan making process as well as through the implementation of the plan through the development management and regeneration procedures and practices.	Ongoing	To be confirmed	The Council will not only enable legal compliance; however, it will enable social inclusion.	N/A

Section 08	Agreement, publication and monitoring
Chief Officer sign-off	Name: David Gawthorpe Position: Team Leader, Policy and Spatial Planning Email: localplan@lbhf.gov.uk

	Telephone No:
Key Decision Report	Date of report to Cabinet/Cabinet Member to adopt the Climate Change SPD: 23 October 2023