

# Equality Impact Assessment Report

**Full Equality Impact Assessment Report**  
(EIA13-14)

**Date to EIA panel, department, DLT or DMT**  
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**Title:** The Local Plan; consultation results; and equalities impacts

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# London Borough of Lambeth

## Full Equality Impact Assessment Report

### 1.0 Introduction

#### 1.1 Business activity aims and intentions

*In brief explain the aims of your proposal/project/service, why is it needed? Who is it aimed at? What is the intended outcome? What are the links to the cooperative council vision, corporate outcomes and priorities?*

The purpose of this report is twofold; to feed back to the Panel the outcomes of the draft Local Plan consultation which was undertaken for six weeks during March and April 2013 (see Appendix 1 for the Local Plan Consultation Report); and to provide a summary of the equalities impact assessment on the draft Local Plan policies.

In October and November 2012 an EqIA was prepared on the Consultation Plan for the draft Local Plan. A number of resulting actions on how the consultation would be monitored, evaluated and reviewed was outlined in the EqIA. This is presented in Table 1 below, alongside feedback on the actions.

Issue	Resulting actions	Feedback response
Pre-consultation	<ul style="list-style-type: none"> <li>Publish FAQ website with background information included</li> <li>Link to published Cabinet Report on website, followed by email updates and tweet</li> </ul>	This information was published on the council website in early February 2013. Email updates and tweets on forthcoming consultation were sent from 12 February 2013.
Consultation	<ul style="list-style-type: none"> <li>Audit trail of consultation messages including emails and letters to stakeholder lists</li> <li>Response rates similar or exceeding Core Strategy rates</li> <li>Variety of measures used including visual and audio</li> <li>Number of website hits on Local Plan page and FAQs page</li> <li>Number of responses from different equality groups</li> </ul>	<p>Audit trail of consultation messages including emails and letters sent to stakeholder lists can be found on the council's internal Xdrive system. Consultation messages are summarised in section 3.1 of this Report as well as more fully explained in the Consultation Report (attached as Appendix 1).</p> <p>A total of 564 responses were received in this consultation. This compares with an equivalent 197 responses received on the Core Strategy consultation (i.e. written questionnaires, other written response, and focus groups). Importantly, more resources were available for the Core Strategy consultation including use of on-street surveys which alone resulted in 605 survey responses. Therefore comparing like for like consultation methods; this consultation on the draft Local Plan of 564 responses significantly exceeded the response rate of the Core Strategy.</p> <p>The number of website hits on the Local Plan was 2279 during the consultation period. The bespoke</p>

		<p>blog site page was viewed 433 times.</p> <p>Equality information was gathered as part of the questionnaires and this data is summarised in section 3.1 of this report. Written responses (excluding questionnaires and workshop attendees) were received from business groups (13); community groups (22); Councillors (8); developers (31); housing association (1); local authorities (8); representative body (1); residents (64); and statutory bodies (13).</p>
Feedback	<ul style="list-style-type: none"> <li>• Publication of Consultation Statement which evidences responses to all comments</li> <li>• Feeding back via council publications, website and email</li> </ul>	<p>A Consultation Report has been prepared by the communications team on the consultation of the draft Local Plan. It is attached as Appendix 1 to the report.</p> <p>Receipt of all 161 written representations was acknowledged.</p> <p>Officers are currently responding to each consultation submission and two separate schedules of all consultation responses and Sustainability Appraisal recommendations and consequential proposed changes to the Local Plan is being prepared. This will be published on the website.</p>
Equalities monitoring	<ul style="list-style-type: none"> <li>• Equalities and diversity information will be captured and monitored when undertaking consultation.</li> <li>• Number of requests for translations and disability requirements at meetings</li> </ul>	<p>Equality and diversity information was captured where possible (i.e. 337 questionnaires). It was not possible to capture this information from the written responses.</p> <p>No requests for translations or disability requirements at meetings were received. However all meetings and workshops were held at accessible locations for those with disabilities.</p>
Review of consultation	<ul style="list-style-type: none"> <li>• Review Equalities Impact Assessment to ensure consultation methods were inclusive</li> </ul>	<p>Methods of consultation included consultation booklet and questionnaire, workshops, mole events, drop-in sessions, broader publicity and communications. The mailout was wide ranging and encompassing and included:</p> <ul style="list-style-type: none"> <li>▪ 97 Black, Asian and minority ethnic groups</li> <li>▪ 15 Disability groups</li> <li>▪ 319 Faith groups</li> <li>▪ 10 Gypsy and Traveller groups</li> <li>▪ 7 Older persons groups</li> <li>▪ 65 Registered social landlords</li> <li>▪ 206 tenants and residents associations</li> <li>▪ 614 voluntary/community/amenity groups</li> <li>▪ 134 younger persons groups</li> <li>▪ 83 Lambeth business support network groups</li> </ul>

**Table 1: Report back on previous EqIA 2012 actions**

The Local Plan is the statutory development plan for the borough designed to guide the spatial development of Lambeth. The current Local Plan is made up of our Core Strategy 2011 and saved Unitary Development Plan (UDP) policies. Lambeth Council is updating elements of its planning policy to provide a new Local Plan for the borough. This is driven by a number of factors, including changes in national planning policy. A partial review of the Core Strategy will ensure it remains consistent with the National Planning Policy Framework, published in March 2012, and

reflects Lambeth's cooperative council aspirations.

The Local Plan Review includes:

- A partial review of the Core Strategy (adopted January 2011)
- The integration of new, detailed development management policies and site allocations (to replace the old UDP policies).

Consultation on the draft Local Plan closed on 26<sup>th</sup> April 2013 following a six week period. Officers are currently responding to each of the consultation responses received and are revisiting or amending policy as appropriate. A schedule of all consultation responses received alongside officer responses is currently being prepared as a continuation of the transparent consultation process. The next stage is for Cabinet to approve pre-submission publication and submission of the revised Local Plan (that takes account of consultation responses and Sustainability Appraisal recommendations). The Local Plan will then be subject to independent examination by the Planning Inspectorate who will determine whether the Plan meets the tests for soundness. For a plan to be sound it must be positively prepared, justified, effective and consistent with national policy. Should the Planning Inspectorate find the Plan to be sound, it is expected to be adopted in early 2015.

An integrated Sustainability Appraisal incorporating both equality, and health and well being assessments was prepared on the draft Local Plan. It is a technical comprehensive document that appraised the Local Plan provisions. The purpose of the SA is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response. The draft Local Plan was assessed against a sustainability framework comprising of 17 sustainability objectives, including an equalities objective. Importantly, while the SA contains a specific section each on health (SA Objective 2) and equalities (SA Objective 5); analysis and assessment of equalities and health and wellbeing is threaded throughout the entire SA work. The SA identified a total of 175 recommendations on the Local Plan. Officers are currently in the process of responding to each of these recommendations, and these will be published in a schedule separate from the consultation responses received on the Local Plan. The SA was also available for comment alongside the Local Plan during the consultation period. Four responses were received on this document, including one from Lambeth and Southwark Public Health Directorate. This EqIA report extracts and summarises key points of the integrated SA assessment, and therefore for the full analysis one should refer to the full SA document (see link below)  
<http://www.lambeth.gov.uk/Services/HousingPlanning/Planning/PlanningPolicy/LocalPlan/SustainabilityAppraisalForThePlanningPolicyEvidenceBase.htm>

An updated SA will be prepared on the submission version Local Plan, which will also take into account comments received by the four responders on the SA prepared on the draft Local Plan.

## Local Plan Review Consultation and Engagement Plan

### 2.1 Evidence dashboard

Any proposed business activity (new policy or strategy), service change, procurement) must be made by carrying out an assessment of the likely impact that it will have for our customers. In this section please include both data and analysis which shows that you understand how this decision is likely to affect residents that fall under the target groups below.

The dashboard below provides equality data for each of the eleven target groups, a summary of how planning can affect each target group and the Local Plan policies which seek to address any potential planning issues. A more detailed analysis of Local Plan policies on target groups can be found in section 4.0 of this Report and the SA.

Target groups	Impact: Positive Negative Both None Unknown	Impact analysis <i>Please explain how you justify your claims around impacts. Please include any data and evidence that you have collected including from surveys or complaints to support your proposed changes to business activity.</i>	External data sources
Race	Positive	<p>Lambeth is an extremely ethnically diverse Borough. The proportion of white British people has decreased from 50% to 39% in the last 10 years (Census 2011). Lambeth's largest non-white ethnic group is Black African (11.8%), followed by Black Caribbean (10.1%). Lambeth has the third largest proportion of Black Caribbean people in London (10.1%) after Lewisham (13.8%) and Croydon (10.6%). Only 3.6% of Lambeth residents are from South Asian backgrounds much less than the inner London average (10.6%), and 3.1% of Lambeth's population are Chinese or from other Asian groups, compared to 4.5% of Inner London. The Borough has the second highest proportion of black Caribbean people in the country and has the highest proportion of people identifying themselves as Other Black in the country (Census 2011).The Borough also has sizeable Portuguese, Polish and Vietnamese communities.</p> <p><i>Potential planning issues affecting race / ethnicity</i></p> <ul style="list-style-type: none"> <li>▪ Accessing suitable affordable housing can be problematic.</li> </ul>	<p>Lambeth State of the Borough Report 2012</p> <p>Census 2011</p>

		<ul style="list-style-type: none"> <li>▪ Fear of crime, racial abuse and discrimination can prevent the enjoyment of the public realm and accessing open space.</li> <li>▪ Employment opportunities including affordable premises for small businesses and shops.</li> <li>▪ The London Boroughs' Gypsy and Traveller Accommodation Needs Assessment, identified a requirement for additional pitches for gypsies and travellers in Lambeth</li> <li>▪ Recently arrived communities can be more vulnerable to social isolation.</li> </ul> <p><i>Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)</i></p> <ul style="list-style-type: none"> <li>▪ Policy H2 – Delivering affordable housing</li> <li>▪ Policy H10 – Gypsy and Traveller Needs</li> <li>▪ Policy D1 – Delivery and monitoring</li> <li>▪ Policy Q1 – Inclusive Environments</li> <li>▪ Policy Q3 – Community safety</li> <li>▪ Policy EN1 – Open space</li> <li>▪ Policy ED1 – Key Industrial and Business Areas</li> <li>▪ Policy ED2 – Business uses outside KIBAs</li> <li>▪ Policy ED6 – Town centres</li> <li>▪ Policy ED14 – Markets</li> <li>▪ Policy ED15 – Employment and training</li> <li>▪ Policy PN3 - Brixton</li> </ul>	
<b>Gender</b>	Positive	<p>The gender split in Lambeth (49.6% male and 50.4% female) is similar to inner London and the country (both around 50-50).</p> <p><i>Potential planning issues affecting gender</i></p> <ul style="list-style-type: none"> <li>▪ In order for people (particularly women) to balance work and domestic responsibilities, there is a need to be able access employment and training opportunities close to home.</li> <li>▪ Access to affordable childcare is a key factor to women engaging fully in the labour market.</li> <li>▪ Personal safety and crime concerns mean that a safe and accessible public realm including walking and cycling routes are particularly important for women.</li> </ul> <p><i>Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)</i></p> <ul style="list-style-type: none"> <li>▪ Policy ED2 – Business uses outside KIBAs</li> <li>▪ Policy ED4 – work-live development</li> </ul>	Census 2011

		<ul style="list-style-type: none"> <li>▪ Policy ED6 – Town centres</li> <li>▪ Policy s1 – Safeguarding existing community premises</li> <li>▪ Policy S2 – New or improved community premises</li> <li>▪ Policy S3 – Schools</li> <li>▪ Policy T2 – Walking</li> <li>▪ Policy T3 – Cycling</li> <li>▪ Policy T4 - Public transport infrastructure</li> <li>▪ Policy EN1 – Open space</li> <li>▪ Policy Q3 – Community safety</li> </ul>	
<b>Gender re-assignment</b>	Positive	<p>Overall not much is known about gender reassignment group in the Borough. It has been estimated that there are 20 transgender people per 100,000 people in UK, which suggests roughly 50-60 transgendered people in Lambeth. There is not much local information – data from Lambeth Living (the largest housing ALMO in Lambeth) indicates that of their 24,800 tenants, 28 (0.1%) are transgender.</p> <p>People undergoing gender transition are more likely to be victims of hate crime and anti-social behaviour. Research conducted in the borough found that 29% of respondents avoided going to certain areas and 33% avoided going out at certain times of day/night. Lambeth is 6<sup>th</sup> highest in the country for registered same-sex civil partnerships (Census 2011).</p> <p><i>Potential planning issues affecting gay, lesbian, bisexual and transgender groups</i></p> <ul style="list-style-type: none"> <li>▪ There is understood to be a general lack of awareness of the way discrimination impacts on lesbian, gay, bisexual and transgender communities with regard to employment, housing, health services etc.</li> <li>▪ Personal safety in public spaces is often an issue.</li> <li>▪ Vauxhall in particular, has a high concentration of night time entertainment venues which cater to LGBT communities.</li> </ul> <p><i>Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)</i></p> <ul style="list-style-type: none"> <li>▪ Policy D1 – Delivery and monitoring</li> <li>▪ Policy Q1 – Inclusive Environments</li> <li>▪ Policy Q3 – Community safety</li> </ul>	<p>Lambeth: a trans agenda? 2012</p> <p>State of the Borough Report 2012</p> <p>Census 2011</p>
<b>Disability</b>	Positive	There are approximately 17,000 moderately or severely disabled people	State of the Borough Report

	<p>of working age in Lambeth and around 33,000 with a common mental disorder. This represents 6.4% of the working age population, in line with the London average (7%). In November 2011, 12,870 Lambeth residents were in receipt of Disability Living Allowance.</p> <p><i>Potential planning issues for people with disabilities</i></p> <ul style="list-style-type: none"> <li>▪ Disabled people are more likely to experience worklessness than non-disabled people. It is important that new workplaces, employment and training facilities, as well as educational facilities, are accessible to all. (Accessible workplaces as well as ability to travel to work can be issues.)</li> <li>▪ There are particular shortages of housing suitable for people with extra care needs, mental health needs and learning disabilities leading to a lack of choice and inappropriate housing.</li> <li>▪ The public realm is often not fully accessible.</li> <li>▪ Local access to social facilities and services.</li> <li>▪ Access to public places can be a particular issue for people who may experience social phobias or anxieties.</li> <li>▪ Lambeth has one of the highest incidences of mental health issues in the capital, particularly among those from ethnic minority backgrounds. There are a growing number of people with learning disabilities living in the borough.</li> <li>▪ The risk of social isolation.</li> <li>▪ Access to public transport.</li> <li>▪ Neighbour noise (soundproofing), overcrowding, access to green spaces and community facilities and fear of crime can all impact on mental well-being. (This is an overarching issue that can affect all groups).</li> </ul> <p><i>Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)</i></p> <ul style="list-style-type: none"> <li>▪ Policy Q1 – Inclusive Environments</li> <li>▪ Policy Q2 - Amenity</li> <li>▪ Policy T2 – Walking</li> <li>▪ Policy T3 – Cycling</li> <li>▪ Policy T4 – Public transport infrastructure</li> <li>▪ Policy H5 – Housing standards</li> <li>▪ Policy H6 – Residential conversions</li> <li>▪ Policy H8 – Housing to meet specific community needs</li> <li>▪ Policy H9 – Hostels and houses in multiple occupation</li> <li>▪ Policy EN1 – Open space</li> <li>▪ Policy EN3 – Low carbon and renewable energy</li> <li>▪ Policy EN4 – Sustainable design and construction</li> <li>▪ Policy S1 – Safeguarding existing community premises</li> </ul>	2012
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		<ul style="list-style-type: none"> <li>▪ Policy S2 – New or improved community premises</li> <li>▪ Policy S3 – Schools</li> <li>▪ Policy Q3 – Community safety</li> <li>▪ Policy D1 – Delivery and monitoring</li> </ul>	
<b>Age</b>	Positive	<p>The age breakdown for Lambeth is as follows:</p> <ul style="list-style-type: none"> <li>▪ Under 20 years: 21.8%</li> <li>▪ 20 – 44 years: 51.8%</li> <li>▪ 45 - 59 years: 15.8%</li> <li>▪ 60+ years: 10.6%</li> </ul> <p><i>Potential planning Issues affecting Older People</i></p> <ul style="list-style-type: none"> <li>▪ Older people are more likely to be living in poverty and suffering the associated effects of low quality and inappropriate housing. Many sheltered housing places in Lambeth are unpopular, and do not meet the need of older people in terms of space, facilities and location. Often, older people would prefer to carry on living in their homes.</li> <li>▪ Safety and security can be a real concern for older people, both in their homes and in public and open spaces.</li> <li>▪ Health, social care and other services including community facilities often do not meet the needs of older people by being poorly located and inaccessible. This can lead to social isolation.</li> <li>▪ Convenient, inexpensive, safe and reliable public transport is particularly important to older people, along with specialist transport services such as dial-a-ride.</li> <li>▪ Accessibility of the public realm.</li> <li>▪ Fuel poverty.</li> <li>▪ Greater vulnerability to the effects of flooding</li> <li>▪ The number of those aged 85 in the borough is expected to increase which will significantly increase demand for care services.</li> </ul> <p><i>Potential planning issues affecting children and young people</i></p> <ul style="list-style-type: none"> <li>▪ Those aged under 15 years make up almost one in five residents in the borough.</li> <li>▪ Child poverty and social exclusion is often caused by parents and guardians</li> </ul>	Census 2011

not having access to employment and training opportunities.

- The provision of high quality social facilities, including childcare, play and informal recreation, youth services and meeting places, sport, leisure, culture and educational facilities. Space for young people is a particular priority in those parts of the borough where levels of youth unemployment, crime and gang activity are high.
- A lack of access to free and inclusive play space and open space can hinder mental and physical development and independence. A recent audit highlighted geographical disparity in access to play across the borough, with a particular lack of facilities in the south of the borough, in West Norwood and Streatham. As the population of the borough increases, access to quality play provision will become an increasing priority across the borough as a whole.
- Concerns relating to crime, safety and vulnerability particularly in relation to street crime and road accidents.
- Reliable, safe and inexpensive (or free) public transport is required to enable young people to be independently mobile.
- Obesity is a growing problem among children and young people in the borough.
- For young people, concerns relating to anti-social behaviour focus on people using or dealing drugs.
- Lambeth has a high number of young people Not in Employment, Education or Training (NEET)
- There is current and future demand for additional school places in the borough at both primary and secondary level.
- Lambeth currently has a high teenage conception rate

*Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)*

- Policy Q1 – Inclusive Environments
- Policy Q2 - Amenity
- Policy T2 – Walking
- Policy T3 – Cycling
- Policy T4 – Public transport infrastructure
- Policy H3 – Safeguarding existing housing
- Policy H4 - Housing mix in new developments
- Policy H5 – Housing standards
- Policy H6 – Residential conversions
- Policy H7 – Student housing
- Policy H8 – Housing to meet specific community needs
- Policy H9 – Hostels and houses in multiple occupation
- Policy EN1 – Open space

		<ul style="list-style-type: none"> <li>▪ Policy EN3 – Low carbon and renewable energy</li> <li>▪ Policy EN4 – Sustainable design and construction</li> <li>▪ Policy S1 – Safeguarding existing community premises</li> <li>▪ Policy S2 – New or improved community premises</li> <li>▪ Policy S3 – Schools</li> <li>▪ Policy Q3 – Community safety</li> <li>▪ Policy D1 – Delivery and monitoring</li> <li>▪ Policy ED6 – Town centres</li> <li>▪ Policy ED9 – Hot food take-aways near schools</li> <li>▪ Policy ED14 – Markets</li> <li>▪ Policy ED15 – Employment and training</li> </ul>	
<b>Sexual orientation</b>	Positive	<p>There is only a limited amount of information on sexual orientation available. Recent health estimates suggest that Lambeth has one of the largest populations of men who have sex with men (MSM) in the UK. MSM accounts for up to 15% of the male population, nearly three times the London average of 5.3%. Around 4% of people identify as being lesbian, gay or bisexual on our residents’ survey and there are a number of thriving LBG venues in and around Vauxhall.</p> <p><i>Potential planning issues affecting gay, lesbian, bisexual and transgender groups</i></p> <ul style="list-style-type: none"> <li>▪ There is understood to be a general lack of awareness of the way discrimination impacts on lesbian, gay, bisexual and transgender communities with regard to employment, housing, health services etc.</li> <li>▪ Personal safety in public spaces is often an issue.</li> <li>▪ Vauxhall in particular, has a high concentration of night time entertainment venues which cater to LGBT communities.</li> </ul> <p><i>Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)</i></p> <ul style="list-style-type: none"> <li>▪ Policy D1 – Delivery and monitoring</li> <li>▪ Policy Q1 – Inclusive Environments</li> <li>▪ Policy Q3 – Community safety</li> </ul>	<p>Lambeth Research and Consultation Briefing Lesbian, Gay and Bisexual customer service insight report 2012</p> <p>State of the Borough Report 2012</p>
<b>Religion and belief</b>	Positive	<p>Over half of the population of Lambeth are Christian (56%) which is close to the London population (58%), 5% are Muslim (compared to 13% in London) 2% Buddhist, 1% Hindu. 4% of the population are from any</p>	<p>State of the Borough Report 2012</p>

	<p>other religion while 30% say they follow no religion at all which is much higher than the 19% of the general London population.</p> <p>Muslim residents are likely to be younger, more ethnically diverse and less economically active than the population as a whole. They are more likely to have a main language that is not English. Muslim residents are more likely to prefer accessing council services in person, which may reflect lower confidence with written English and therefore on-line services (Customer survey 2012). Christian residents are more likely to be older, more settled residents, often in social housing, although there are also substantial smaller groups from, for example, Poland, Africa and Portugal who are younger and less settled. Services for older people could be targeted at Christians through churches and faith networks, including support and to encourage accessing services on-line (Customer survey 2012).</p> <p><i>Potential planning issues affecting faith groups</i></p> <ul style="list-style-type: none"> <li>▪ In some areas of the borough there is a shortage of accessible places of worship and facilities for cultural and community activities. New, larger church congregations in particular struggle to find the right size of premises in appropriate locations.</li> <li>▪ Accessing suitable affordable housing can be problematic.</li> <li>▪ There is a shortage of burial space in the borough, particularly in order to meet the specific requirements of Muslim communities.</li> <li>▪ Spirituality and faith are an integral part of an individual's well being.</li> </ul> <p><i>Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)</i></p> <ul style="list-style-type: none"> <li>▪ Policy H2 – Delivering affordable housing</li> <li>▪ Policy D1 – Delivery and monitoring</li> <li>▪ Policy Q1 – Inclusive Environments</li> <li>▪ Policy Q3 – Community safety</li> <li>▪ Policy EN1 – Open space</li> <li>▪ Policy S1 – Safeguarding existing community premises</li> <li>▪ Policy S2 – New or improved community premises</li> </ul>	<p>Lambeth PEP Briefing Religion and Belief customer insight report 2012</p>
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<p><b>Socio-economic factors</b></p>	<p>Positive</p>	<p>Lambeth is a very diverse Borough ethnically, culturally, socially and economically and this diversity is constantly evolving. It is among the most densely populated local authorities in England, with over 11,300 people per km<sup>2</sup>. Lambeth's population is 303,100, which makes it the third largest population in inner London, after Newham (308,000) and Wandsworth (307,000) (Census 2011). The socio-economic profile of the area is mixed, with areas of affluence and deprivation in close proximity. The borough is the 14<sup>th</sup> most deprived district in England, comparable with Southwark, Lewisham and Haringey, but less deprived than the most deprived London boroughs of Newham, Tower Hamlets and Hackney. The most deprived areas are spread throughout the borough but are particularly concentrated in Coldharbour ward, in Brixton, and in the Crown Lane area of Knights Hill ward, in the south of the Borough.</p> <p>One in three children attending Lambeth schools is eligible for free school meals (35.5% for primary and 31.5% for secondary). This is comparable with inner London (34.4% and 36% respectively) but higher than London (25% and 23.4%)</p> <p>Unemployment is a major barrier to economic prosperity. 82% of Lambeth residents are economically active, which is one of the highest borough rates in London (compared with 75% across London).</p> <p>Overall, Lambeth has a highly qualified workforce – nearly 55% have degree level qualifications, compared to 42% in London overall. In London, only Wandsworth has substantially higher qualification levels (64%). 9.4% of Lambeth residents have no qualifications, in line with London (9.9%), substantially below the highest rates (e.g. 17% in Barking and Dagenham).</p> <p>Perhaps reflecting Lambeth's central location, 60% of Lambeth working residents are managers and senior officials or work in professional, associate professional and technical occupations, compared to 54% in London overall. This is the 8th highest out of the 32 London boroughs.</p>	<p>State of the Borough Report 2012</p> <p>2011 census</p>
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*Potential socio-economic planning issues*

- Accessing suitable affordable housing can be problematic.
- Fuel poverty
- Access to jobs, training, services and facilities including healthcare, transport, education, open space, play space
- Access to affordable childcare
- Employment opportunities including affordable premises for small businesses and shops.
- Over concentration of betting shops, pawn brokers, money lending shops in town centres
- Access to cheap, nutritious locally grown food

*Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)*

- Policy H2 – Delivering affordable housing
- Policy H5 – Housing standards
- Policy H8 – Housing to meet specific community needs
- Policy H9 – Hostels and houses in multiple occupation
- Policy H10 – Gypsy and Traveller Needs
- Policy D1 – Delivery and monitoring
- Policy Q1 – Inclusive Environments
- Policy Q3 – Community safety
- Policy EN1 – Open space
- Policy EN2 – Local food growing and production
- Policy EN3 – Carbon reduction and renewable energy
- Policy EN4 – Sustainable design and construction
- Policy ED1 – Key Industrial and Business Areas
- Policy ED2 – Business uses outside KIBAs
- Policy ED6 – Town centres
- Policy ED8 – Night time economy and food and drink uses
- Policy ED9 – Hot food takeaways near schools
- Policy ED10 – A2 uses
- Policy ED14 – Markets
- Policy ED15 – Employment and training
- Policy T2 – Walking
- Policy T3 – Cycling
- Policy T4 – Public transport infrastructure
- Policy S1 – Safeguarding existing community premises
- Policy S2 – New or improved community premises
- Policy S3 – Schools
- Policy Q1 – Inclusive Environments

		<ul style="list-style-type: none"> <li>▪ Policy Q2 - Amenity</li> <li>▪ Policy Q3 – Community safety</li> <li>▪ Site allocations</li> <li>▪ Places and neighbourhoods policies</li> </ul>	
<b>Marriage and civil partnership</b>	Unknown	No known negative impacts have been identified for this target group. According to official returns from the Lambeth Register Office, between 600 and 800 marriages and under 100 civil partnerships are undertaken in the borough each year (in 2011, 641 marriages and 79 civil partnerships were conducted). This is in line with other similar boroughs like Southwark and Lewisham.	State of the Borough Report 2012
<b>Pregnancy and maternity</b>	Positive	<p>No known negative impacts have been identified for this target group and there is a gap in data on number of pregnant women and those on maternity in the Borough.</p> <p><i>Potential planning issues affecting pregnancy and maternity</i></p> <ul style="list-style-type: none"> <li>▪ Access to health and social care services including hospitals, doctor surgeries, nurseries and childcare, open space and transport</li> </ul> <p><i>Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)</i></p> <ul style="list-style-type: none"> <li>▪ Policy S1 – Safeguarding existing community premises</li> <li>▪ Policy S2 – New or improved community premises</li> <li>▪ Policy S3 – Schools</li> <li>▪ Policy EN1 – Open space</li> <li>▪ Transport policies</li> </ul>	
<b>Language</b>	None	Approximately 150 languages are spoken in the Borough. After English the main languages spoken are: Portuguese, Yoruba, French, Spanish and Twi (LBL 2012). Lambeth ranks 13 <sup>th</sup> in the country for having no people in a household age over 16 with English as a main language and 20 <sup>th</sup> for having no people of any age (Census 2011).	<p>Translation and interpretation report 2012</p> <p>Census 2011</p>
<b>Health</b>	Positive	Lambeth fares comparatively worse for health inequalities when compared nationally. Healthy lifestyle issues are still an area of concern (e.g. high smoking prevalence, worsening obesity levels related to poor diets and lack of physical activity, alcohol and drug misuse and child	Lambeth Research and Consultation Briefing Disability Customer Insight Report 2012

	<p>obesity).</p> <p>Lambeth male life expectancy is 77 years compared to the England average of 78.5 years, and Lambeth female life expectancy is 81 year compared to England average of 82.5 years (NHS Lambeth 2012).</p> <p>Coronary heart disease, malignant cancers and respiratory diseases remain the top three causes of death in the Lambeth population (NHS 2012). Hypertension, diabetes, chronic obstructive pulmonary disease and severe mental illness are also major long term conditions impacting health of Lambeth residents. Socio-economic challenges such as unemployment and poor housing result in high rates of child poverty, and social exclusion which subsequently results in poor physical and mental health are indicators of health inequality (NHS Lambeth 2012).</p> <p>The 2011 census found that 6.1% of Lambeth residents say their day-to-day activities are limited a lot by long term health problems or disabilities; and a further 6.6% say there day to day activities are limited a little. These figures are both less than those for Inner London and London as a whole. Lambeth is in the top 10% of districts for places where people say they are in a very good health (53%)(Census 2011).</p> <p><i>Potential planning issues affecting health</i></p> <ul style="list-style-type: none"> <li>▪ Housing – provision of affordable, high quality accessible housing in areas close to everyday amenities, jobs and schools. Fuel poverty concerns</li> <li>▪ Employment – accessibility to local jobs, skills and training. Child poverty and social exclusion is often caused by parents and guardians not having access to employment and training opportunities.</li> <li>▪ Environment – access to green open space and play space for young people. A lack of access to free and inclusive play space and open space can hinder mental and physical development and independence</li> <li>▪ Transport – provision of safe walking and cycling environments as well as good public transport provision. Major developments and regeneration projects in areas with high public transport accessibility levels.</li> <li>▪ Safety – Concerns relating to crime, safety and vulnerability particularly in relation to street crime and road accidents.</li> </ul>	<p>Census 2011</p> <p>NHS Lambeth 2012</p>
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- Obesity is a growing problem among children and young people in the borough.

*Snapshot/signpost of Local Plan policy addressing potential planning issues (for a more detailed assessment see section 4 of this report)*

- Policy H2 – Delivering affordable housing
- Policy H5 – Housing standards
- Policy H8 – Housing to meet specific community needs
- Policy H9 – Hostels and houses in multiple occupation
- Policy H10 – Gypsy and Traveller Needs
- Policy D1 – Delivery and monitoring
- Policy Q1 – Inclusive Environments
- Policy Q3 – Community safety
- Policy EN1 – Open space
- Policy EN2 – Local food growing and production
- Policy EN3 – Carbon reduction and renewable energy
- Policy ED9 – Hot food takeaways near schools
- Policy ED10 – A2 uses
- Policy ED14 – Markets
- Policy ED15 – Employment and training Policy EN1 – Open space
- Policy EN2 – Local food growing and production
- Policy EN3 – Carbon reduction and renewable energy
- Policy EN4 – Sustainable design and construction
- Policy T2 – Walking
- Policy T3 – Cycling
- Policy T4 – Public transport infrastructure
- Policy S1 – Safeguarding existing community premises
- Policy S2 – New or improved community premises
- Policy S3 – Schools
- Policy Q1 – Inclusive Environments
- Policy Q2 – Amenity
- Policy Q3 – Community safety

## **2.2 Gaps in evidence base**

*Have you checked the council's equality and monitoring policy? What gaps in information have you identified from your research and evidence analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are unable to fill in the gaps please state this clearly with justification.*

There is some gap in the evidence base for the areas of gender reassignment and sexual orientation. Such information can prove difficult to obtain although more information is becoming available recently, particularly with regards to sexual orientation.

The impact on Marriage and Civil Partnerships is equally indeterminate, although the impact of the Plan on this group is not expected to be significantly different than that of other groups such as age and sexuality for example.

## **3.0 Consultation, Engagement and Co-production**

### **3.1 Engagement and consultation with stakeholders**

*Who are your key stakeholders and how have you consulted, co-produced or engaged with them? What impact has this had on the project/proposal/service?*

A consultation plan was prepared outlining how the Council would go about consulting on the draft Local Plan. The Consultation Plan (Appendix 1) was subject to an EqlA (attached as Appendix 2) and presented to the Equalities Panel. A number of further meetings with colleagues from the Equalities team were held to further discuss options for a more inclusive consultation, as requested by the Panel. Accordingly parts of the Consultation Plan were reviewed and amended in light of the Panel meeting and later discussions. For example, discussions were had on focusing consultation messages on areas of planning that would be more engaging to more people, such as town centre activity, night-time economy, and the number of betting shops, pawn brokers, money shops and estate agents (A2 uses) in local centres. It was discussed that the consultation could be integrated with the licensing consultation, however unfortunately timing did not allow for this, but a workable solution was to ensure licensing offers were present at community stakeholder workshops that had the town centre focus. Another further improvement resulting from discussions was presenting the four page insert in the Lambeth Talk publication (distributed to every household in the borough) in such a way that was more engaging to a wider audience and harder to reach people and groups. This included language used, key topics that would more likely generate local debate, and use of pictures to help attract more responses.

The consultation was specifically designed to address different stakeholder groups and methods used were targeted to access and engage with certain groups, subject to resources. Stakeholder groups included the general public; Lambeth local forums, community groups and networks including equalities groups (black and minority ethnic, faith, disability, young people and older persons groups); tenants' and residents' associations; business and business networks; developers, including registered providers of social housing; neighbouring boroughs and other

local authorities affected by Lambeth planning policies; infrastructure and service providers; politicians; Lambeth council officers; and the Greater London Authority.

Consultation and engagement methods included physical copies of the consultation booklet and questionnaire and on LBL website and [www.lambethtalks.org](http://www.lambethtalks.org); press releases and adverts; four page insert in borough magazine; Enews; summary leaflets at public buildings including libraries and town hall; staff drop in sessions; exhibition at Phoenix House and Lambeth Town Hall; email updates to Lambeth Regeneration mailing list; twitter; mail out including summary leaflets and questionnaires; written responses; stakeholder workshops; attendance at 'mole' events; individual meetings; group meetings; Planning and Development Cabinet Advisory Panel; Cabinet Member Briefings; and Ward Member briefings.

In total, 564 people or organisations participated in the consultation process. This breaks down as 337 questionnaire responses, 161 other written representations and 66 workshop participants (including 15 council members).

The consultation was framed around specific elements that people could more easily relate to and meaningfully influence the direction of the policy (for example, night-time economy, affordable housing, hot food takeaways near schools, and numbers of betting, pawn and money shops). Elements of the new Local Plan have been co-produced or informed by other co-production activity (for example Loughborough Junction policy has been co-produced with the Loughborough Junction Action Group, and policies for Brixton, Vauxhall and Waterloo have taken on board community feedback received during the preparation of their respective SPDs).

Additionally, the draft Local Plan has not been formulated from scratch but rather has been built on a foundation of wide-ranging consultation from other appropriate council documents (including for example, the emerging Community Infrastructure Levy (CIL) charging schedule; the Libraries and Community Hub consultation; the Housing Strategy consultation; SPD consultations for Vauxhall, Waterloo and Brixton; along with work around the emerging Lambeth Prospectus for Growth).

Consultation materials, including the consultation booklet and questionnaire focused on the areas of the Core Strategy potentially changing the most. These were themed around the following areas:

- Support our town centres
- Attract business and encourage entrepreneurs
- Better homes

Four key consultation methods were used to test the level of support for the proposed approach under each theme. These methods were:

- (1) consultation booklet and questionnaire, as part of consultee mailout and use elsewhere;
- (2) workshops;
- (3) other face-to-face methods of engagement (mole events and drop-in sessions) and;
- (4) broader publicity and communication (for example articles, twitter, websites and in libraries).

#### (1) Consultation booklet and questionnaire / mailout

The consultation booklet and questionnaire formed the primary method of consultation. The booklet summarised the proposed approach in each of the areas outlined above, as well as explaining the process for developing the Lambeth Local Plan. We attempted to structure questions in a manner to foster honest feedback on planning issues that affect all people (including the above three themes). The questionnaire was prepared by experienced colleagues in the communications team.

The booklet and questionnaire was sent as part of the consultation mail out to 2,202 groups or organisations and 347 private individuals. The mailout list includes a wide range of interested parties (see Table 1 for breakdown of numbers) including registered social landlords; developers; voluntary, amenity and community groups; disability groups; faith groups; Black, Asian and minority ethnic groups; older and younger persons groups; local businesses; gypsy and traveller groups; statutory stakeholders; general public; GLA; politicians; and specific consultation bodies.

Copies of the booklet and questionnaire were also available at all Lambeth libraries, Lambeth Town Hall and Phoenix House reception. Copies were also taken to every consultation workshop or 'mole' event for distribution. The output of this method was 337 questionnaires returned. Unusually for our recent planning policy consultations, only 52 questionnaires were returned by freepost (15%) and the remainder were completed online. Overall, people responding via the questionnaire method were strongly homogenous so not much data analysis of sub-groups was possible. Questionnaire respondents tended towards an older demographic of White British (73%). Those aged 60-74 were proportionally the most over represented and those aged 20-29 the most under represented. There was a big disparity between owner occupiers (73%) and all other tenures. However, the questionnaire respondents were fairly representative in terms of long term illness or disabilities as illustrated in figure 1 below.

The questionnaire responses resulted in a combination of qualitative and quantitative data. The Consultation Report (Appendix 1) summarises the results of the public consultation including an overview of the quantitative and qualitative consultation findings, along with an outline of the methodology and an evaluation.

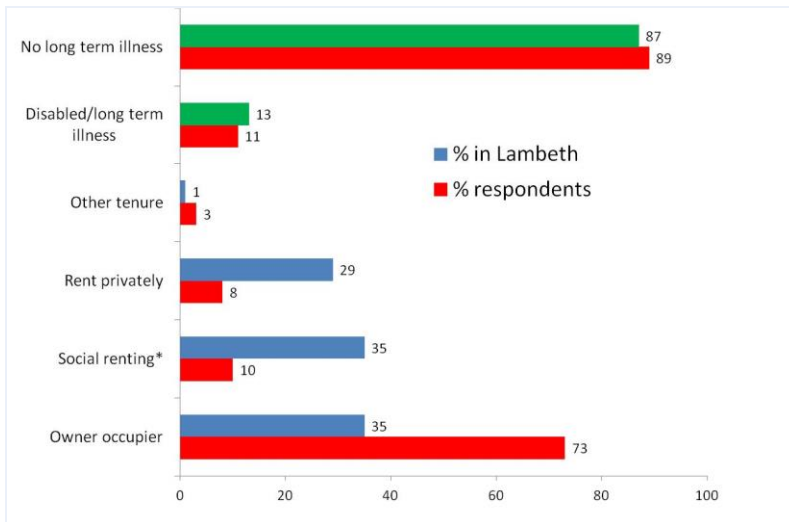


Figure 1: Tenure and disability makeup of questionnaire respondents against total percentage in Lambeth

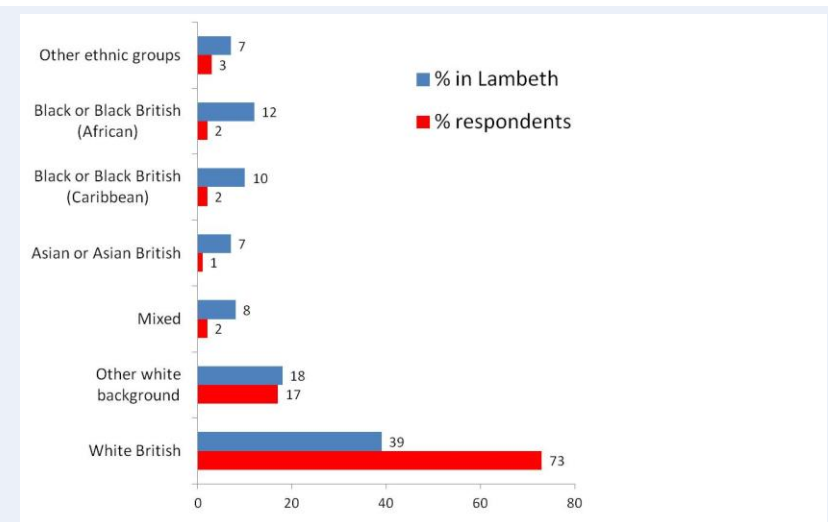


Figure 2: Ethnic makeup of questionnaire respondents against total percentage in Lambeth

As shown in figure 2 above those responding by questionnaire were overrepresented in terms of White British people and underrepresented in relation to all other BME groups. The 'other ethnic groups' section is very diverse and includes those of a non African/Caribbean black background.

The majority of questionnaire respondents lived in Lambeth (89%). No specific questions were asked about which area of Lambeth people lived in but from address details provided it can be seen that at least 21 per cent of those living in Lambeth live in Streatham and 19 per cent live in West Norwood. Some limited stakeholder analysis by town centre was possible and this is provided further throughout the Consultation Report.

### Written responses

Written responses could be made to a freepost address or by email to [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk). A total of 161 written responses were received (not including additional comments made through the questionnaire). The breakdown for these is as follows (Table 2):

Type of respondent	Number of written representations received (not questionnaires)	Percentage of written representations received (not questionnaires)
Resident	64	40%
Community group	22	13.6%
Councillor	8	5%
Business or business representative	13	8.1%
Developer or agent	31	19%
Housing association	1	0.6%
Local authority	8	5%
Representative body	1	0.6%
Statutory agency	13	8.1%
Total	161	100%

Table 2: Number of written responses (excluding questionnaires) received by respondent

## (2) Workshops

Three stakeholder workshops were held to discuss different themes with different audiences. Invitations were sent to a cross-section of community and business stakeholders from across the borough geographically and from across different interest areas. In total 66 people attended a workshop (including 15 Members), although a few people attended more than one. Examples of some local stakeholder groups in attendance include Lambeth Governors' Forum, Streatham Society, Kennington Oval Vauxhall Forum, West Norwood Feast, Federation of Small Businesses, Lambeth NHS. A separate workshop was held for developers, including registered providers of affordable housing. The following are some examples of developers and registered providers in attendance: Peabody, Family Mosaic, Hyde Housing, Clapham Park Home. A full list of attendees for all workshops can be found in section 4.2 of the Consultation Report (Appendix 1).

## (3) Other face-to-face methods of engagement

### *Mole events*

Planning policy officers attended a total of 15 community meetings to present the draft Local Plan and promote the consultation. At each event copies of the summary booklet and questionnaire were available to take away. Five requests to attend additional meetings were made as a result of attending these 'mole' events and all requests were satisfied. Examples of events attended include: Lambeth Forums Network, Travellers' Working Group, Lambeth Housing Associations Group, Tenants' Council, Leaseholder's Council. A full list of meetings attended can be found in section 4.3 of the Consultation Report (Appendix 1).

### *Drop-in sessions*

Throughout the consultation period, planning policy officers were available to discuss the draft Local Plan at the council offices in Phoenix House on Tuesday afternoons. This was promoted as part of the consultation activity but only one drop-in visitor was received.

#### (4) Broader publicity and communication

The above consultation methods were supported by a range of other publicity to help increase awareness of the consultation. These included promotions through websites and e-bulletins (for example GIFTS database (approx 1,900 recipients), schools bulletin, LAMHAG network of registered social landlords, tenants council, leaseholders council, and the regeneration team mailing list (approx 2,000 recipients)); availability of Local Plan, supporting documents, consultation booklet and questionnaire in all libraries, Town Hall and Phoenix House; advert and public notice in Lambeth Weekender (5 April 2013); four page section on Local Plan in Lambeth Talk (April 2013); articles in Lambeth Weekender (5, 19 April and 4 May 2013); press releases and tweets; bespoke blog site; and promotion on plasma screens in Customer Centres and Brixton Town Hall.

By employing these different methods, and ensuring we specifically targeted as many equality groups as possible (particularly through the mailout); we attempted to compensate for what was expected to be overrepresentation in responses. While it is traditionally very hard to engage people in the area of local plan policy work (which looks to the future and non-immediate concerns which people generally find hard to relate to) we have tried to be as inclusive and user friendly as possible. The four page insert in Lambeth Talk, articles in The Weekender and the consultation booklet and questionnaire attempted to make some of the key planning issues more relevant and encourage local debate via the blog or consultation more generally. We have a duty to consult with a range of individuals and organisations such as developers, GLA, landowners, infrastructure providers, and accordingly must take account of all views, not just those of residents. All consultation is being assessed quantitatively and qualitatively and a schedule of responses is being prepared, alongside the SA recommendations to inform a holistic review of the Local Plan in light of all responses received. This will be reported to Cabinet in November 2013.

Overall, and taking into account the nature of local plan policy it is considered that our consultation approach was as inclusive and as user friendly as possible, particularly given resources available. The response rate compares favourable against other recent responses received on planning documents as shown in Table 3:

Planning document	Number of responses	
	Written questionnaire	Other written responses
CIL	n/a	36
Waterloo SPD	226	37 (2011) + 30 (2012)
Vauxhall SPD	541 + further 223 through outreach work	30
Brixton SPD	555	49
Core Strategy	75	99
<b>Draft Local Plan</b>	<b>337</b>	<b>161</b>

**Table 3: Number of responses received on recent planning and regeneration consultations**

The success of the consultation (particularly against the Core Strategy response) can largely be attributed to improved quality of consultation materials and the benefit of working with communication professionals, and their advice and facilitation on wider publicity, promotional activity and workshop events.

### **3.2 Gaps in consultation and engagement**

*What gaps in consultation and engagement have you identified? Please identify where more consultation and engagement is required and set out how you intend to undertake it.*

Consultation was in line with the Consultation Plan specifically prepared for the draft Local Plan which was subject to an EqlA and presented to the Equalities Panel. The consultation approach to ensure an inclusive engagement was accordingly reviewed and amended where appropriate following discussions with the Panel and colleagues in the Equalities team.

While it may be perceived in figures 1 and 2 above that there is a gap in *questionnaire* response rates from council or housing association tenant, different ethnic groups, and the younger age demographic; these groups were specifically targeted for engagement through the mailout and through invitations to workshops, and indeed some were represented in the workshop sessions (for example housing associations, community groups). Whilst these groups were targeted, it is of course not possible to ensure that they make a response. Unfortunately it was not possible to collect equality monitoring data on the 161 written responses received as these were from individuals and organisations that chose to prepare their own written response, rather than respond via the questionnaire which did include equality monitoring feedback.



## 4.0 Equalities Impact Assessment Plan

### 4.1 Recommendations and justification

*What are the main conclusions of this EIA? Are there any disproportionate negative or positive impacts, if so, are they justifiable and how will they be mitigated?*

This section of the report focuses on the impact of the draft Local Plan on equality groups. Table 4 below is a summary extract from the SA report and provides analysis of the impact draft local plan policies may have on eleven different equality groups. The assessment also identifies some recommendations to improve effects on equality groups. Overall, it is considered that the Local Plan will have positive impacts on equality groups. An area for potential negative impact is the cost/affordability of public transport to some users, which is technically outside the scope of planning policy, but is an area the council can continue to lobby for. Some uncertainty may arise in terms of high rise buildings for residents and impacts on mental health; and flood risk and those who are less able to deal with the impacts of flooding. These would need to be carefully considered and balanced in development proposals.

The following key has been used in the assessment:

- + Likely positive impact
- Likely negative impact
- ? Unknown impact
- O No impact identified.

The consideration of responses is being provided in a schedule containing all consultation responses and SA recommendations. The recommendations outlined in Table 4 below are being addressed alongside the comments received at consultation to inform a revised Local Plan for Cabinet approval in November 2013. This schedule will be made publicly available adding to the transparent consultation process. Following Cabinet approval the revised Local Plan is scheduled for pre-submission publication (late 2013), submission (March 2014) and examination by an independent planning inspector (March to August 2014) with adoption expected early 2015.

**Table 4: Assessment and recommendations to improve Local Plan impact on equality groups**

Policies	Impact on Equality groups											Comments and Recommendations	
	Race	Gender	Gender reassignment	Disability	Age	Sexual orientation	Religion / belief	Socio-economic	Marriage/civ partnership	Pregnancy/maternity	Language		Health
Delivery and monitoring	+	+	+	+	+	+	+	+	+	+	+	+	<p>Delivery and monitoring policies will contribute positive effects on all equality groups through working with a range of partners, delivering regeneration defined in Opportunity Area Planning Frameworks and local area master-plans (and these contain areas of the most deprived parts of Lambeth such as Brixton), including helping to promote and maintain mixed, balanced and diverse communities within neighbourhoods. The Council will work with applicants to secure development that improves the economic, social and environmental conditions in Lambeth that result in inclusivity and equality of the Borough. Section 106 funding will provide or fund local improvements to infrastructure, including access to facilities, access to employment and affordable housing. To further improve positive outcomes for equality groups it is recommended that policy D4 is amended to make sure the list of infrastructure is not definitive and that off-site provision be allowed where appropriate (although it is recognised on-site provision is normally preferred).</p>
Housing	+	+	+	+	+	+	+	+	+	+	+	+	<p>Overall it is considered the housing policies should result in positive effects on equality groups. By increasing the supply and range of housing, including affordable housing of mixed tenures and size, and including accommodation for people with care and support needs; housing provision will likely benefit all equality groups, particularly those on low income levels and requiring specialist housing through providing greater housing choice and availability. Affordable housing should be provided on-site and be indistinguishable from other housing, and therefore should result in more equitable outcomes and feelings of social cohesion. However, if this cannot be ‘practically achieved’, policy states that off-site provision or even a payment in lieu may be permissible. Off site provision would need to be within 400m of the development site. This may not necessarily result in ‘mixed and balanced communities’ and therefore social cohesion may be compromised. A distance of 400m can result in a very different neighbourhood and environment. However, taking land values and viability considerations into account, the policy needs to allow some flexibility in the location and provision of affordable housing. Payments in lieu may not directly or immediately result in availability of affordable housing, although it is considered that such payments could contribute to comprehensive and integrated estate regenerations (for example the emerging Estate Regeneration Programme) and supplement the Lambeth Housing Standard fund which may result in more positive effects than developers providing affordable housing just to meet policy requirements.</p> <p>Net loss of affordable units is resisted unless estate regeneration meets tests outlined in policy H3. Similarly net numbers of existing housing is safeguarded, unless the loss arises from creation of family sized units (which will benefit particular equality groups such as</p>

Policies	Impact on Equality groups											Comments and Recommendations	
	Race	Gender	Gender reassignment	Disability	Age	Sexual orientation	Religion / belief	Socio-economic	Marriage/civ partnership	Pregnancy/maternity	Language		Health
													<p>pregnancy and maternity, socio-economic and health groups (mitigating overcrowding). To ensure mixed and balanced communities, a range of dwelling types, sizes and tenure is required. Policy H5 expects that homes will be built to Lifetime Homes standards, which will ensure that new homes are suitable for people's changing needs over their lifetimes and that they are wheelchair accessible. Children's play areas will be required in new developments expected to have ten or more children. Policy H8(c) makes further provision for this. To further enhance outcomes for disability groups it is recommended that <i>at least</i> 10 percent of units are wheelchair accessible (emphasis added), although it is recognised the London Plan Housing and Design SPD only requires 10%.</p> <p>While the draft Local Plan makes provision for student housing; the priority use of land is meeting conventional housing and employment needs. The development of sites for student housing will be carefully managed and specific criteria will need to be met. However, it is not considered that the policy adversely affects student groups.</p> <p>Policy H9 makes provision for new hostels and Houses in Multiple Occupation, and policy H10 sets out a commitment to safeguard the existing site for gypsy and traveller needs, and identify a new site for additional facilities for this group.</p>
Economic development	+	+	+	+	+	+	+	+	+	+	+	+	<p>It is considered that one of the biggest influences on peoples health is employment. The draft Local Plan has a number of policies which either directly or indirectly seek to improve the economy of the Borough, get residents working and thereby create conditions that improve health and reduce inequality. Employment has a strong bearing and effect on mental health. Economic development policies (ED1 – ED3 in particular) seek to safeguard existing business use / employment generating land, and this will likely result in positive effects on mental health and wellbeing of local residents as it helps to improve access to local jobs for local people. Improved vitality and viability of town centres (policy ED6) should also result in positive effects on mental health and wellbeing, through employment opportunities, access to services and facilities, and sense of place. Policy ED15 on employment and training seeks to reduce unemployment in the Borough by supporting job opportunities and apprenticeships associated with major developments in the Borough, and provision of employment and training schemes. It is considered that these policies are likely to generate positive secondary effects in relation to health and sense of community identity and civic participation.</p> <p>Policies ED1 and ED2 seek to protect and maintain sites and premises in business use thereby maintaining and/or increasing employment opportunities in the Borough and help address worklessness and poverty. Major redevelopment proposals will also need to re-provide independent individual shop premises on affordable terms, which will contribute to</p>

Policies	Impact on Equality groups											Comments and Recommendations	
	Race	Gender	Gender reassignment	Disability	Age	Sexual orientation	Religion / belief	Socio-economic	Marriage/civ partnership	Pregnancy/maternity	Language		Health
													<p>maintaining locally owned businesses and cultural and social values in the retail offer they provide. The policies contribute to increased access to localised employment which will benefit many equalities groups including women in terms of offering a better work and domestic life balance.</p> <p>Policy ED6 seeks to safeguard local shops, specialist shopping and markets to meet community needs, which will support different cultural retail sectors. Through this the policy will assist those who are less mobile, such as older people, disabled people and those on low incomes by having these services accessible and local thereby reducing need to travel.</p> <p>Policy ED9 is directed at school aged children attending primary or secondary schools and aims to reduce childhood obesity levels. While this particular group has been identified and singled out and it may be argued that the policy does not promote equity or fairness between population groups (i.e. other age groups); it is considered that the wider benefits to children and society generally outweigh any perceived unfairness. The intent of the policy is commended. However, many schools are close to a boundary of a town centre (according to initial GIS analysis) and therefore a hot food takeaway could still locate in an area of town centre that is close to a school (under the current wording of the policy). Given the size of town centres it is considered that hot food takeaways should locate at least 400m from schools regardless of whether they are within a town centre boundary or not. Interestingly, the policy refers to 'hot food takeaway'. This may not include establishments such as McDonalds or KFC which may be argued to fall within A3 class as a restaurant. Similarly, it would not include other ready made and served unhealthy food such as the sale of donuts or ice cream which also contributes to obesity of the population. Perhaps the policy should refer to 'fast food' and provide a definition of this. To achieve more positive effects particularly on the health group and younger persons, in so far as planning is able to; it is recommended that hot food takeaways (or fast food outlets) are not supported within 400m of a school regardless of whether it is proposed within a town centre.</p> <p>Policy ED10 aims to manage over-concentration of A2 uses, particularly betting shops, pawn brokers and money shops. While some may consider this has a negative impact on low income groups (such as reduced selection of choice) it may also equally result in positive effects on this group by reducing opportunities to spend money / get into debt (i.e. betting shops).</p> <p>Policy ED14 on markets provides opportunity for sale of fresh fruit and vegetables and likely increases the accessibility to affordable healthy and varied foods.</p>

Policies	Impact on Equality groups											Comments and Recommendations	
	Race	Gender	Gender reassignment	Disability	Age	Sexual orientation	Religion / belief	Socio-economic	Marriage/civ partnership	Pregnancy/maternity	Language		Health
													It is considered that policy ED15 should result in positive effects on all equality groups by helping to ensure local jobs go to local people, and that these people have the necessary skills to partake in the employment opportunities offered by major development in the Borough. It will address worklessness, and poverty, including child poverty as well as provide opportunities for young people (but not limited to just the young) to get work through apprenticeships. It should also help women and caregivers in providing localised employment which can assist in maintaining or improving a better work/life domestic balance.
Social infrastructure	+	+	+	+	+	+	+	+	+	+	+	+	<p>Significant positive effects are likely to result from policies S1 (Safeguarding existing community premises) and S2 (New or improved community premises). These policies make provision for community facilities which include D1 and D2 use classes as well as other public service uses such as fire, ambulance, policing, and community safety facilities, all of which are necessary components to a healthy borough. Where new provision is proposed these will be conveniently located and accessible for their intended use, thereby seeking to reduce health inequalities. Ideally, social infrastructure should be located where there is an identified need that helps reduce health inequalities. It is considered this could be more explicitly provided for in the policy in order to better address baseline conditions of community facilities being unevenly spread across the Borough with some neighbourhoods experiencing severe shortages or useable space, while others have are under-used facilities.</p> <p>Policies S1 and S2 support the provision of social infrastructure which should impact positively on poorer communities and on equality groups. To augment positive effects it is recommended that policy S2a)(i) is amended as follows: ‘the site or buildings are appropriate for their intended use <i>and are fully inclusive and accessible to the community</i>’.</p> <p>The exception and tests to allow residential accommodation for nursery or childcare use should benefit pregnancy and maternity, facilitating mothers and fathers back into work, tackle worklessness and poverty. Policy states that large residential schemes and comprehensive housing estate regeneration should include social infrastructure and local shops to meet local need and this should result in positive effects for all equality groups, particularly BME groups and those less mobile (disabled, older residents, and low income groups). It is considered the policies provide environments conducive for improved social cohesion and a more inclusive environment for those of different faith, race and language.</p>
Transport	0	0	0	+	+	0	0	+/-	0	0	0	0	Transport policies T1 – T4 promote sustainable travel, including walking, cycling and use of accessible public transport. Policies seek to minimise the need to travel and reduce dependence on the private car which will benefit poorer residents (including those 50% of residents that do not have access to a private vehicle) and those less able to travel. The policies support improvements to public transport services which will be focused on

Policies	Impact on Equality groups											Comments and Recommendations	
	Race	Gender	Gender reassignment	Disability	Age	Sexual orientation	Religion / belief	Socio-economic	Marriage/civ partnership	Pregnancy/maternity	Language		Health
													<p>maximising its use especially by people with disabilities, the elderly, young children and others for whom public transport accessibility is a barrier. Other barriers to public transport use will arise if it is too expensive, inconvenient, and unreliable or is felt to be unsafe so it is important the Council lobbies for improvements in these regards as well. In so far as planning policy is able; it is considered that policies T1 – T4 seek to address most of these barriers. Improvements to public transport infrastructure should have positive impacts on equality groups especially if they link deprived neighbourhoods with area of employment opportunity. There is a funding gap for the new station at Brixton connecting to the east London line extension so effects on equality groups and the wider population of Brixton are less likely to be maximised. The provision of safe and secure walking routes should have a positive impact on those who are more likely to suffer harassment in the streets, such as LGBT and BME groups. However, the whole journey experience needs to be accessible from leaving the house to arriving at the desired destination. As paragraph 8.4 states, all journeys, particularly those made by public transport, involve an element of walking. People with disabilities, and powered mobility scooters and wheelchairs users all use (or should be able to use) footpaths as part of their journeys. Accordingly, it is considered that policy T2 Walking could be improved to better reflect these users. As currently worded, the policy seems to discriminate against those that cannot walk (in the true sense of the word). Reference to ‘improved accessibility for all’ is recommended as this is not necessarily encapsulated within policy T4 clause (d) which is limited to new or improved public transport infrastructure (although it could be included within policy Q1 Inclusive environments).</p> <p>Policy T5 River transport contains provision for access to the River Thames which can provide a good walking, running and cycling route, as well as mental health benefits associated with access to water and open space. Any new development / addition to the riverside walk should join existing riverside walk to provide a continuous route along the river. The policy states it should be wheelchair accessible. There is uncertainty where this is from. The policy should be clear that riverside walk would need to be wheelchair accessible from the development, as well as existing riverside walk and adjoining street pattern.</p> <p>Policy T7 on parking makes provision for disabled car parking in line with London Plan requirements. Clause (ii) of policy T7 may require clarification so that car club and pool car <i>parking spaces</i> are provided in developments. Paragraph 8.29 suggests that contributions will be required rather than actual parking spaces for car clubs and pool cars within developments that include housing. Provision of car clubs (aim is for a car club space within 400m of each other) will impact positively on equalities groups, particularly those with no access to a car, those that live in areas of poor public transport accessibility, disabled, older residents, and</p>

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													those on lower incomes / cannot afford to own and run a car. Accordingly it is recommended that policy T7(a)(ii) is reviewed for clarity. For those groups that require it, the draft Local Plan makes provision of mini-cabs, taxis and private hire vehicles which will help address accessibility and safe travel.
Environment	O	+	+	+/?	+/?	+	+	+	O	+	O	+	<p>Policy EN1 will likely benefit all groups through providing new open spaces in areas of open space deficiency (or making financial contributions), and improving the quality of and access to existing open space, including the range of facilities available and biodiversity and heritage values. This will help encourage healthy lifestyles and mental well-being for those equalities groups at greater risk of ill-health (e.g. some children and young people, some older people, some women, some members of ethnic minority communities, people with a history of mental illness). The policy also safeguards cemeteries and burial space in the Borough, which will benefit particular faith groups. While policy Q1 ensures inclusive environments, it may be appropriate for the word 'accessible' to be included in clause (c)(i) of policy EN1 as follows: 'the provision of accessible open space in new developments...' which will ensure accessibility in its widest sense for example fully accessible for people with mobility problems or adequate signage for alternative routes. It is recommended this is reviewed by the policy team.</p> <p>Policy EN2 enables access to cheaper or even free fruit and vegetables which will benefit lower socio-economic groups, reduce poverty and improve health and social inclusion / sense of community. However, the policy only encourages or supports such provision; there is no requirement to provide food growing areas. It is also considered that food growing areas/features or use of innovative spaces can be appropriate in non-residential schemes too, such as some D1 class uses and other social infrastructure, for example faith groups may like to have an area for food growing on their site. It is recommended that the policy team revisit this policy in light of these comments.</p> <p>Fuel poverty can be addressed through policies EN3 and EN4 which will help reduce energy bills and benefit lower socio-economic groups, the elderly and other groups struggling to provide a warmer home. In terms of flood risk; the location of housing in relation to health hazards is an important consideration for those who are less able to deal with the impacts of flooding, for example older people, people with disabilities, and children and young people. A key issue will be assessing the potential vulnerability of occupiers in flood risk areas including arrangements for safe access and egress.</p>
Quality of built environment	+	+	+	+	+	+	+	+	+	+	O	+	Policy Q1 relates to new developments and this includes new buildings. It also includes outdoor areas and spaces of developments. It is considered that the supporting text could be strengthened to ensure the public realm including the interface to existing public realm

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													<p>environment is fully accessible and inclusive. This would better link to policy T2 Walking and provide better guidance to clause (a) of the policy. It is recommended that the following is added to clause (c): ‘both within the development and with respect to the wider public realm environment’. Paragraph 10.1 (first sentence) should also be amended as follows ‘All new development, including the wider public realm should be accessible...’</p> <p>Policy Q7 on urban design of public realm could be strengthened to the benefit of a number of equality groups by adding ‘for all users’ to the end of clause (iii) (i.e. that legibility, permeability and convenient access is for all users).</p> <p>Development and alterations to the built environment to create safe and secure environments that reduce crime, fear of crime and anti-social behaviour will benefit all groups but particularly women, the elderly, LBGT and BME groups.</p> <p>Sometimes shop fronts and entrances can be a barrier to disabled people, the elderly and people with pushchairs particularly those within historic buildings. It is considered that policy Q17 ‘shop fronts’ somewhat provides for these groups by clauses (iv) ‘adequate entrance doors’ and clause (vi) ‘have level entrances where possible’. However, couples with other Local Plan policies, in particularly policy Q1 on inclusive environments; significant positive effects for accessibility and inclusiveness should result.</p> <p>Linked to policy T5 and the recommendation made above, it is further recommended that policy Q25 – River Thames makes provision for an accessible continuous riverside walkway.</p>
Places and neighbourhoods	+	+	+	+	+	+	+	+	+	+	+	+/?	<p>Waterloo lies to the north of Lambeth’s’ most deprived areas. Policy PN1 should result in positive effects on all equalities groups. The policy will promote equitable outcomes and social cohesion through affordable housing, local jobs and training, improving public transport capacity, provision of social infrastructure including health, education, childcare, leisure, and promotion of mixed use developments.</p> <p>Policy PN2 for Vauxhall seeks to create new jobs and homes, opportunities for affordable retail, the establishment of a well-funded community development trust that will further strengthen social infrastructure and play a lead role in nurturing a strong sense of distinctive character in this neighbourhood, and improved transport accessibility and connectivity. While the supporting text to the policy refers to the area supporting a number of LBGT nightlife venues, the needs of this and other target equality groups are not specifically referred to in the policy (although designs need be accessible for all, safe and sustainable and accommodate a rich mix of uses). Similarly the policy itself makes no mention of the active Portuguese community and their independent specialist food and retail outlets. Given the</p>



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													<p>level of development proposed for Vauxhall, it is considered that policy PN2 for Vauxhall would benefit by making specific provision for healthcare in this area. It is noted that community uses are provided for but a more specific mention of healthcare facilities might be more appropriate.</p> <p>Brixton contains the highest levels of deprivation in the Borough and suffers from high levels of crime and fear of crime. It is also a place of significance to London's African and Caribbean communities. It is considered that Policy PN3 for Brixton should result in positive effects on all equality groups, but particularly for race and faith groups as the distinctive multicultural and diverse town centre is to be safeguarded and promoted through careful and sensitive regeneration. The Brixton market is supported; and there will also be expansion of arts, creative and cultural industries, mixed use developments, protection of employment opportunities, community uses, affordable and flexible workspace and improvements to public realm and public transport. Brixton is an area known for its significant levels of deprivation and the policy seeks to address this in so far as planning policy can influence environmental factors on deprivation levels.</p> <p>Policy PN4 for Streatham should result in positive effects on all equality groups, particularly those in the local area. Accessibility and use of public transport, walking and cycling will be supported through public realm and transport improvements. The policy also supports additional housing to provide a mix of tenures and range of new residential accommodation for new and local residents which suggests this includes C2 class. Additional cultural spaces and outdoor public space sufficient for a market is envisaged for Streatham Central, as well as refurbishment and extension of community facilities which will result in positive impacts for equality groups. Overall it is considered that the policy has a strong community focus.</p> <p>Clapham has issues of deprivation (including Clapham Park Estate, the largest housing estate in the Borough). Clapham also has some of the most expensive housing. The policy for Clapham has a strong cultural, creative and community focus which will help contribute to more equitable outcomes, and achieve better social cohesion, sense of place and identity for local residents which will likely result in positive effects on equality groups.</p> <p>Similarly policy PN6 on Stockwell seeks to create a distinguishable community focus and heart and a clear physical sense of place supported by its heritage assets. Improvements to and connections between housing estates are proposed which will benefit equality groups, particularly lower socio-economic groups in Stockwell.</p> <p>Policy PN7 also seeks to improve the range and quality of employment and housing, and</p>

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													<p>improve public realm linkages and quality. Policy PN8 for West Norwood/Tulse Hill seeks to increase the amount and quality of social infrastructure, like education and healthcare. Regeneration and improvement of existing housing estates will be supported as will development that meets educational needs in the Borough. The centre also seeks to provide training and investment schemes, traffic and transport improvements, employment, and community and cultural intensification at the Library and Norwood Hall. This policy has a strong community focus and should result in improved social cohesion and sense of place. Policy PN9 on Herne Hill supports the area as a small community focused district centre. A sense of place through its historic character is encouraged and there are public realm improvements proposed.</p> <p>Policy PN10 for Loughborough Junction seeks to radically improve the physical environment of this deprived community. The policy has been co-produced with the Loughborough Junction Action Group (LJAG). Through the policy the Group aspire to creating an environment where all necessary services are within close walking distance of every home. Local energy efficiency initiatives are proposed which will help combat fuel poverty and other adverse effects this causes (for example physical health, mental wellbeing, reduced productivity).</p> <p>An observation made for all policies (PN1 – PN10) is the reference to improving the environment for pedestrians. Interpretation of this would need to include all users of footpaths, including those in powered wheelchairs or scooters, and not just limited to those literally travelling by foot.</p> <p>Policies PN1, PN2, PN3, PN4 and PN8 promote mixed use developments and tall buildings. High rise residential tower blocks do not necessarily create neighbourliness and are not good for all residents. Literature suggests high rises are less satisfactory than other housing, in particular for children, as social relations are more impersonal, increased fear of crime and may contribute to suicides. High rise housing is more satisfactory for residents when they are more expensive and people have chosen to live there. Concentrations of high rise office accommodation in mixed use residential schemes has the potential to leave space empty for parts of the week which may isolate residents from local services and amenities as well as social interaction. An appropriate balance between uses will need to be achieved to avoid adverse impacts on health and wellbeing.</p>

**Table 4: Assessment and recommendations to improve Local Plan impact on equality groups.**

## 4.2 Responding to equality considerations

*The plan should include a description of how you will monitor, evaluate and review the business activity.*

Annex 8 of the Local Plan sets out the framework of performance indicators and monitoring of the Local Plan many of which apply to equality groups (for example, net additional dwellings, gross affordable housing completions, net additional gypsy and traveller pitches, gross additional wheelchair accessible homes completed, new child play spaces created in completed residential developments, public transport accessibility levels, employment land available).

The SA has also made recommendations for additional monitoring indicators and these are being considered.

Table 5 below outlines the next steps for the Local Plan review, including how equality impacts will be addressed.

Issue	Resulting actions	Timeframe	Lead officer
Recommendations arising from EqIA and SA	<ul style="list-style-type: none"> <li>Policy team to respond to each recommendation identified which will be presented as a schedule separate to the schedule of responses received on the Local Plan during the consultation period.</li> </ul>	May –September 2013	
Revised Local Plan (including updated SA on revised Local Plan)	<ul style="list-style-type: none"> <li>Cabinet and full Council approval for pre submission publication</li> </ul>	November 2013	
Pre-submission publication (includes revised SA and how the recommendations have been addressed)	<ul style="list-style-type: none"> <li>Representations in relation to legal compliance and soundness</li> </ul>	December 2013- January 2014	
Submission	<ul style="list-style-type: none"> <li>Examination by independent Planning Inspector</li> </ul>	March 2014 - August 2014	
Local Plan adoption	<ul style="list-style-type: none"> <li>Report to Cabinet and Council recommending adoption of the Plan</li> </ul>	Early 2015	

**Table 5: Forthcoming Action Plan on addressing equality impacts and Local Plan development**

## 5.0 Publishing your results

The results of your EIA must be published as per the council's EIA guidance. Once the business activity has been implemented it must be periodically reviewed to ensure it has the intended impact and is still appropriate.

### EIA publishing date

19 June 2013

### Assessment sign off:

Name	Date
	18 June 2013