



**Development Management Local Plan
Further Options Report**

Equalities Analysis Assessment

April 2013



April 2013

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1. Introduction

The Development Management Local Plan (DMLP) implements and adds further detail to the policies in the Core Strategy. It provides detailed policies that will be used to assess applications for planning permission and to ensure that new development meets the aims of the Core Strategy, and by extension the Sustainable Community Strategy.

The Development Management Local Plan (DMLP) will be adopted as Council Policy once all formal stages are complete. The document has a lifespan up to 2026. It will run concurrently with the duration of the adopted Core Strategy, the main planning policy document for the borough. Many policies in the DMLP introduce no new issues that require assessment as they elaborate on issues dealt with in the Core Strategy which was previously assessed in 2009 with an up-date in 2012. The DMLP however introduces some new detailed policies on subject matters which, while covered in very general terms by the Core Strategy, cannot be considered to have been assessed in any detail by the Core Strategy EIA and the subsequent EAA up-date in 2012, and which have content directly relevant to the protected characteristics of equalities groups.

This assessment is being conducted at an early stage in the preparation of the DMLP called the 'Further Options Stage'. This is where a number of options for each policy are considered prior to preparing a final plan for submission to the Secretary of State where the text of the policies chosen is more or less finalised. Subsequently an Examination in Public is conducted by an Inspector appointed by the Secretary of State which assesses the 'soundness' of the DMLP in relation to criteria in the National Planning Policy Framework so that it may be adopted by the Council and form part of the Development Plan for the borough..

The Government requires all councils to produce a set of documents collectively known as the Local Development Framework (LDF) which sets out the planning strategy and policies for an area. The LDF will eventually replace the remaining saved policies in the Lewisham Unitary Development Plan (UDP). The Core Strategy, adopted in June 2011, is the main LDF document and sets out the overall strategy for the regeneration of the borough. The Development Management Local Plan follows on from the Core Strategy, and provides detailed policies that will be used to manage development to meet the strategic development aims set out in the Core Strategy, (and by extension the Sustainable Community Strategy).

The Development Management Local Plan will set out policies with criteria and standards for managing the following types of development:

- Implementing the Core Strategy
- Promoting health and well-being
- Presumption in favour of sustainable development
- Prevention of loss of existing housing
- Conversions of single dwellings into flats
- Conversions of offices/commercial premises into flats
- Sheltered housing and care homes
- Houses in multiple occupation
- Affordable rent

- Student housing
- Mixed use employment locations
- Local employment locations
- Other employment locations
- Town centre vitality and viability
- Location of main town centre uses
- District centres primary and secondary frontages
- Neighbourhood local centres
- Local shopping parades and corner shops
- Restaurants and cafes
- Hot food take-away
- Shopfronts, signs and hoardings
- Public houses
- Mini cab and taxi offices
- Sustainable design and construction
- Air quality
- Open space and biodiversity
- Landscaping and trees
- Noise and vibration
- Lighting
- Contaminated land
- Car parking
- Urban design and local character
- Alterations and extensions to existing buildings including residential extensions
- Housing design, layout and space standards
- Infill, backland, back garden and garden amenity area development
- Thames Policy Area
- Public realm and street furniture
- Listed buildings, conservation areas and other designated heritage assets
- Non-designated heritage assets including locally listed buildings, areas of special character and assets of archaeological interest
- Demolition or substantial harm to designated and non-designated heritage assets
- Telecommunications
- Public conveniences
- Community facilities
- Nurseries and childcare
- Art, culture and entertainment facilities
- Places of worship
- Hotel provision

A full Equalities Impact Assessment (EIA) was carried out in respect of the policies in the Core Strategy in February 2009, this is set out as appendix 2 to this report. The impact assessment was carried out at a stage when the Core Strategy was still in preparation and was presenting a series of options for each policy. It was also undertaken prior to the Quality Act 2010 and the requirements of the Public Sector Equality Duty. All options in the document were assessed. Some adverse impacts were identified and an action plan was

produced. The policies in the Development Management Local Plan (DMLP) must be consistent with and implement the policies in the Core Strategy.

The purpose of this Equalities Analysis Assessment is therefore to

- assess whether the DMLP introduces new issues not previously assessed
- consider in detail some policies which, while covered in general terms by the Core Strategy raise issues of detail that require an EAA
- review whether the DMLP has addressed the issues in the EIA action plan for the Core Strategy.
- Up-date the demographic date on which the assessment is based
- This EAA will also provide an up-date on the implementation of the previous EAA of the Core Strategy in 2012 (and the EIA in 2009).

The Council has produced its Comprehensive Equalities Scheme (CES) for 2012-16. The CES provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.

2. Background

2.1 The Core Strategy EIA (2009) identified issues across a range of protected characteristics that needed to be addressed. These issues were based on the guidance contained in the London Plan Supplementary Planning Guidance Document 'Planning for Equality and Diversity in London' (October 2007) which set out which planning issues were relevant and could reasonably be dealt with by planning policies. Following the guidance means that the issues examined aligned with the issues examined in assessing equalities issues for the London Plan.

2.2 The Core Strategy covers the entire borough and applies new policies on changes to the physical environment such as: change of use of buildings, protection of such uses as open space, protection of existing community facilities and providing new ones, shops, offices, industrial buildings and warehouses, and the quality, amount and location of new housing development. The scoping, and the subsequent up-date in the EAA, concluded that the following issues covered by the Core Strategy were relevant to equalities groups:

- The needs of all groups to access employment and training
- Quality of housing and accessibility to housing for all groups including the provision of affordable housing
- Provision of accessible and safe public transport
- Provision of community facilities e.g. schools and places of worship
- Provision of a safe and accessible public realm to reduce crime and the fear of crime
- Provision of safe and accessible open space and play facilities
- provision of the above improvements and facilities in deprived areas of the borough to reduce social exclusion
- vulnerability to hate crime, anti-social behaviour, and harassment
- provision of family housing (3+ Bedrooms)

2.4 The Core Strategy provides policies at a strategic level and does not deal with the interior of individual buildings which might include community facilities or with housing allocation policies. The Core Strategy is the physical expression of the Council's Sustainable Community Strategy.

2.5 The Development Management Local Plan follows on from the Core Strategy and produces detailed guidelines for developers and applicants for planning permission to ensure that the aims of the Core Strategy for new development are met. It has the following objectives:

- to facilitate a positive and proactive approach to shaping, considering, determining and delivering development proposals to meet the core strategy objectives
- to facilitate development which protects and enhance the amenity of the local area
- to ensure a high standard of design
- to create safe, attractive, accessible and functional environments for all
- to secure development that helps create a more sustainable Lewisham and facilitates positive impacts on health and well-being.

2.5 The overall equalities assessment of the Core Strategy in 2009 was that the policies would not discriminate and that most policies have a positive impact.

2.7 The Core Strategy sets out the main strategic framework for the future development of the borough and sets out high level policies dealing with the location, type and quality of new development. The Core Strategy must under Planning Legislation be 'in general conformity' with the London Plan. This means that although the policies in the Core Strategy and the Development Management Local Plan are locally targeted and based on local evidence there must be no overall conflict with the aims of the London Plan. The policies in the London Plan may also be used to support the Council's stance on planning issues as it is formally part of the Development Plan for the Borough. As stated above in paragraph 2.1 the original EIA of the Core strategy relied heavily on a document supplementary to the London Plan for the assessment of the plan on equalities issues.

3. The Equality Act 2010

3.1 The Council has an obligation to have regard for the duties set out in the Equality Act 2010. These duties are outlined below.

3.2 The Equality Act 2010 became law in October 2010. The Act aims to streamline all previous anti-discrimination laws within a Single Act. The new public sector Equality Duty, which is part of the Equality Act 2010, came into effect on the 5 April 2011.

3.3 The new equality legislation covers the following protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. It also applies to marriage and civil partnership, but only in respect to eliminating unlawful discrimination and only in relation to employment.

3.4 The Equality Duty has three aims. It requires public bodies (including local authorities) when making decisions to have due regard to the need to:

- I. eliminate unlawful discrimination, harassment, victimisation and any conduct prohibited by the Equality Act 2010
- II. advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- III. foster good relations between people who share a protected characteristic and people who do not share it.

4. Development Management Equalities Analysis Assessment

Introduction

4.1 In general the options for policies examined at the DMLP Further Options Stage were relatively limited due to the prior content of the Core Strategy, and the legal requirement to be consistent with the London Plan and the National Planning Policy Framework or other legislation related to the environment. The DMLP Options often presented a choice as to whether to include a local policy in the DMLP or to simply rely on other legislation, the NPPF or the London Plan to carry forward the aims of the Council. The main consideration when presenting the options was the relative strength of the policy which was considered to have a stronger effect when the option was to include the policy in the DMLP. The options to include a policy in the DMLP are therefore considered to have the most positive impact on the protected characteristics of equalities groups by ensuring that the aims of the Core Strategy are clearly carried forward into Development Management decisions.

4.2 Does the DMLP introduce new equality issues?

The following policies in the Development Management Document are considered to not be relevant to the protected characteristics of equalities groups as they relate to the physical external fabric of buildings, interpret/express other legislation which is not capable of alteration by the Council, or simply provide a more extensive interpretation of policies in the Core Strategy which have already been assessed. These policies are:-:

Presumption in favour of sustainable development. – this policy is a government requirement

Prevention of loss of existing housing – this policy provides more detail for Core Strategy Policy 1

Conversion of office space and other B Use Class space into flats – this policy reflects and summaries other policies in the Core Strategy and Development Management Document

Affordable Rented Housing – this policy interprets Core Strategy Policy 1 in relation to the new government definition of affordable housing

Mixed Use Employment Locations – this policy provides a framework for the future retention of employment floorspace given planning permission by Core Strategy Policy 4

Local Employment Locations – this policy provides more detail on the stance taken in Core Strategy Policy 3 in protecting office industrial and storage uses in these locations

Other employment locations – provides more detail on how Core Strategy Policy 5 will be implemented

Town Centre vitality and viability – interprets Core Strategy policies on general accessibility and safety

Location of main town centre uses, District centres shopping frontages, and Neighbourhood Local Centres, Local shopping parades and corner shops ,– interprets Core Strategy policies in relation to various town centre and shopping area uses

Sustainable Design and Construction – This policy delivers Core Strategy Policies 7 and 8

Air Quality – This policy implements Core Strategy Policy 7 and Core Strategy Policy 9

Open Space and Biodiversity – This policy delivers Core Strategy Policy 11 and Core Strategy Policy 12

Landscaping and trees – This policy implements Core Strategy Policy 12

Noise and Vibration – This policy implements Core Strategy Policy 12 (Open space and environmental assets)

Contaminated Land – This policy implements the requirements of the Environmental Protection Act

Car parking – this policy implements Core Strategy Policy 14

Urban Design and Local Character – This policy implements Core Strategy Policy 15 and four spatial policy areas identified in the Core Strategy

Thames Policy Area and Deptford Creekside – This policy assembles in one place range of policies in the Core Strategy

Listed buildings, conservation Areas and other designated heritage assets, Non-designated heritage assets including locally listed buildings, areas of special local character and assets of archaeological interest, Demolition or substantial harm to designated and non-designated heritage assets – these three policies implement Core Strategy policy 16

Telecommunications – the content of this policy is largely prescribed by the National Planning Policy Framework.

Arts Culture and entertainment facilities – this policy implements Core strategy policy 19

4.3 Detailed assessment of new policies in the DMLP

The Development Management Local Plan introduced some new policies on a range of issues which may impact on the protected characteristics of equalities groups. While these policies interpret the aims of the Core Strategy they provide a new level of specific detail that require assessment as well as the subject matter of the policies being of direct relevance to the protected characteristics of equalities groups.

The DMLP policies considered necessary to review for equalities assessment are:

- **Conversion of a single residential dwelling to two or more dwellings**
- **Sheltered housing and care homes**
- **Houses in Multiple Occupation**
- **Student housing**
- **Hot food take-away shops**
- **Shopfronts, signs and hoardings**
- **Public Houses**
- **Mini cab or taxis offices**
- **Lighting**
- **Alterations to existing buildings including residential extensions**

- **Housing Design, layout and space standards**
- **Development on Infill Sites, Backland Sites, Back Gardens and Amenity Areas**
- **Public realm**
- **Public Conveniences**
- **Innovative community facility provision**
- **Nurseries and Childcare**
- **Places of Worship**
- **Hotels**

Appendix 1 sets out a detailed equalities analysis of the above policies. In summary the assessment concludes that the conversions policy, mini cab policy, HMO policy, lighting policy, public realm policy, hotels policy will have no adverse impact; that the public house policy, alterations policy, housing design policy, infill and back garden policy, public convenience policy, shopfronts policy, community facilities policy, nurseries policy will have a positive impact with no adverse impacts, the take away policy will have a positive impact on the Age group.

4.4 Consultation on the Development Management Local Plan Further Options Report

The Consultation process for this report is outlined in a separate Consultation Statement dated March 2012 to be found on the Council's website at

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/development-policies/Pages/default.aspx>

The main comments received in relation to the Protected Characteristics of Equalities Groups were that

- affordable housing should provide family housing as opposed to smaller flats
- support for high quality urban design to increase accessibility and reduce the fear of crime
- need for further investment in public open space and places for children to play
- need to refer to public transport accessibility
- support for mixed use developments on all locations in business or industrial use
- need to support smaller town centres and shops to ensure accessibility of services to all groups

The consultation responses to the Further Options Report which was consulted on between December 2012 and January 2013 mainly related to the detailed design of new development in terms of its visual impact, and the location of new development and where it should be allowed in relation to impact on the quality of the street scene.

4.5 Action Plan

5. Update of the previous Core Strategy Equalities Assessments

The Core Strategy sets the context for the Development Management Local Plan and sets out the detailed criteria for assessing whether planning permission should be granted for new development.

The Action Plan for the Core Strategy Equalities Appraisal stated that research should be undertaken into:

- the structure of employment on the industrial sites that are proposed to be redeveloped for mixed use business with.
- The adverse impact on Faith groups due to the protection of employment premises
- The pressure on public facilities and infrastructure due to the intensity of new development proposed.
- The production of a Planning Obligations Supplementary planning document
- The implications of introducing a community infrastructure levy and
- Infrastructure delivery plan.

An update on these action points is set out below:

Mixed use employment sites.

The lead in time for development is over a period of many years so it was considered that the nature of employment on the designated sites would change over time and be out of date by the time the schemes came to fruition.

A number of the mixed use employment schemes designated in the Core Strategy have now received planning permission. There is no new up- date on these sites since the 2012 Core Strategy EAA up-date other than to states that a new outline planning applications for Convoys Wharf is expected shortly.

The commitment of many of the schemes to relocated business on site, and to providing a mix of uses which will generate a variety of jobs including entry level jobs for younger people is considered to mitigate the adverse impact of the loss of some jobs which would have been traditionally available. This is of relevance to the protected characteristics age groups, gender reassessment, marriage and civil partnerships, disabilities, race and gender.

The Development Management Local Plan responds to the need to retain a proportion of employment floorspace on these sites by seeking to ensure that the level of this space on these sites is not reduced through future applications for change of use to residential. This policy therefor seeks to minimise the adverse impact already identified of the loss of traditional industries and to ensure that the advantages of the redevelopment in terms of a greater number and variety of jobs are retained. This will be of benefit to all protected characteristics.

Adverse Impact on Faith Groups

This impact was identified due to the shortage of economical premises for faith groups to occupy and their consequent unauthorised use of warehousing/industrial units for this purpose. Ways of mitigating this impact within the remit of the Core Strategy were considered. It was thought that the designation of Mixed Use Employment Locations which would replace some industrial sites would potentially allow the provision of premises which could be used by faith groups. A large multi faith centre will be provided as part of the development of the Surrey Canal Triangle SSA and will be able to accommodate large congregations and be available to all religious groups. Other ways of mitigating this impact were outside of the influence of the Core Strategy, such as, for example, the multiple use of community buildings such as schools by using them after school hours.

The Development Management Local Plan responds to the need of faith groups for premises in two ways:

- A new policy sets out criteria for when new faith developments would be acceptable, and where existing buildings will be protected from redevelopment or change of use. This policy while not providing new faith facilities directly will provide certainty to faith groups as to where new facilities will be appropriately located and some protection for existing premises. This should benefit this protected characteristic by reducing the incidence of enforcement against unsuitably located buildings and therefore reduce the adverse impact of protecting employment areas from faith based facilities.
- A policy on innovative community facility provision states that the Council will encourage the provision of community meeting space by encouraging the use of school space after hours and the temporary use of vacant space where appropriate. This should benefit this protected characteristic by potentially providing new useable space for places of worship.

Pressure on Public facilities by intensity of development

The Core Strategy EIA identified the concerns of community groups and local residents that the choice of a borough wide regeneration strategy would place undue stress on community facilities and public transport. The Assessment considered that this would potentially produce an adverse impact on protected characteristics particularly in the Deptford New Cross Area where most of the new development would be located, and where general levels of deprivation are such that these impacts would particularly affect vulnerable people. Actions in relation to this are discussed below in relation to the Planning Obligations Supplementary Planning Document and the Community Infrastructure Levy.

Planning Obligations Supplementary Planning Document

The action plan proposed that a Planning Obligations Supplementary Planning Document (SPD) should be produced in order to ensure that the identified requirements of the protected characteristics outlined in the report would be met.

Planning obligations, or Section 106 agreements, are legal agreements between local planning authorities and developers, or unilateral undertakings made by developers, in the context of the grant of planning permission. Planning obligations are intended to provide funding for a range of community improvements that may be needed as a consequence of development.

The S106 Planning Obligations SPD, including the amendments made in response to consultation was adopted by the Council on 24 January 2011.

Community Infrastructure Levy (CIL)

Lewisham Council is currently preparing proposals for a Community Infrastructure Levy (CIL). This is a new way in which local authorities can charge against most types of new development in their area. The money raised will be used to pay for local and sub-regional strategic infrastructure to support the new developments and population, such as schools, hospitals, roads and transport schemes as well as parks and leisure centres, and will help to reduce the adverse impacts identified above.

The Council consulted on a preliminary draft charging schedule during March and April 2012 and on a draft charging schedule from December 2012 up to end of January 2013 and hopes to have the CIL adopted and operational by April 2014.

Infrastructure Delivery Plan (IDP)

The Council has also produced an Infrastructure Delivery Plan to aid the process of delivery of appropriate infrastructure to support existing and new residents of Lewisham. It represents the Council's current understanding on infrastructure issues and has been prepared in consultation with those responsible for delivering infrastructure throughout the borough. .

The IDP is accompanied by a schedule in order to identify infrastructure needs and costs (including where possible phasing of development), funding sources and responsibilities for development. The IDP was published in xx

Consultation on the Core Strategy

Full details of the various stages of consultation undertaken, spanning five years between 2005 - 2010 can be found in the Core Strategy Consultation Statement on <http://www.lewisham.gov.uk/myservices/planning/policy/Documents/CoreStrategyPublicationConsultationStatementFebruary2010.pdf>.

A theme running through the consultation undertaken on the Core Strategy was the need for provision of a network of community facilities in order to support the proposed regeneration of the borough. Concern was expressed by a number of community groups that the proposed provision of new housing mostly in the Deptford New Cross Area would put an undue strain on existing infrastructure in terms of:

- provision of a network of accessible community facilities
- provision of new employment opportunities and protection of buildings in which existing jobs are located.
- accessibility to safe and convenient public transport.
- design, accessibility and safety of the public realm
- An appropriate mix of housing needed to be provided

All these issues impact on equalities groups.

6. Conclusions

6.1 The assessment has checked whether, in any of the areas identified:-

- there is unlawful discrimination
- there is an adverse impact on one or more protected characteristics
- there is a failure to promote equality of access or opportunity

- protected characteristics are, or may, be excluded from benefits
- some protected characteristics are disadvantaged.

6.2 Taking into account the issues raised in the current assessment, and building on the work carried out for the 2009 Equalities Impact assessment for the Core Strategy, and the Core Strategy EAA update in 2012 no major change is considered necessary to the documents or to the Action Plan set out in the previous Assessment.

6.3 The need for a new Gypsy and Traveller Site identified in the previous assessments is not within the scope of the Development Management Local Plan. This is being carried forward in a new Gypsy and Traveller's Site(s) Local Plan which will allocate a site or sites. Preparation of this plan has recently commenced and will be subject to a separate equalities assessment.

6.4 As stated in the Equalities Impact Assessment for the Core Strategy much of the positive effects of the policies in the DMLP document will depend on implementation and schemes coming forward from developers that meet the policy requirements and equalities aims set out.

6.5 The Council will continue to monitor the impact of the policies on protected characteristics and opportunities for this will occur with the preparation of further documents in the Lewisham Local Development Framework – in particular the Development Management Local Plan and the Lewisham and Catford Town Centre Local Plans which will deal with some more detailed implementation issues.

6.6 The impact of the Community Infrastructure Levy and the contribution this money will make towards providing facilities of benefit to community groups, together with planning obligations will also continue to be closely monitored by the Planning Service.

Reference: Provision of goods, facilities and services to trans people: Equality and Human Rights Commission

http://www.equalityhumanrights.com/uploaded_files/EqualityAct/psd_trans_guidance.pdf

Appendix 1

Detailed Assessment of Relevant Policies in the Development Management Further Options Document

	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and maternity	Race	Religion or belief	Gender/ Sex	Sexual orientation
Conversion of a single residential dwelling to two or more dwellings	Positive/ High Relevance	Positive/ Medium Relevance	Neutral/ Low Relevance	Neutral/ Low Relevance	Positive/ High relevance	Neutral/ Low Relevance	Neutral/ Low Relevance	Neutral/ Low Relevance	Neutral/ Low Relevance
This policy option seeks to restrict the conversion of family dwellings to self-contained flats to limited locations in order to preserve family housing with gardens in the context of a pre-existing high proportion of converted housing in the borough. The option also seeks to ensure that new conversions meet high quality space standards. This will have a positive impact on those groups whose protected characteristics require appropriate space and facilities in housing. No adverse impacts are indicated. By restricting the number of converted properties most provision for disabled people will be in new building housing which will be built to appropriate lifetime homes and wheelchair housing standards. No adverse impacts identified									
Sheltered housing and care homes	Positive/ High relevance	Positive/High relevance	Neutral/ low relevance	Neutral/ Low relevance	Neutral/Low relevance	Neutral/ Low relevance	Neutral/ Low relevance	Neutral/ Low relevance	Neutral/ low relevance
This policy seeks to ensure that Sheltered housing and care homes are appropriately located in terms of access to services and meet the needs of their future occupiers. This will have a positive impact on Age and Disability equalities groups. No adverse impacts identified.									
Houses in Multiple Occupation	Positive/ High relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ High relevance	Neutral/ low relevance	Neutral/ Low relevance	Neutral/ low relevance
Houses in Multiple Occupation provide low cost housing for people on low incomes. This is likely to be true for young single people and people in race groups. The policy is intended to ensure that this accommodation is of a good standard. It is also relevant to disability									

	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and maternity	Race	Religion or belief	Gender/ Sex	Sexual orientation
groups as the policy requires that 10% of rooms should be wheelchair accessible. No adverse impacts are identified.									
Student housing	Positive/ High relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ medium relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance
This policy seeks to ensure that student housing provision provides a high quality living environment that is appropriately located and meets all standards for Houses in Multiple Occupation. It will have a positive impact on equalities groups that require appropriate physical facilities. The policy also seeks a variety of accommodation with varied unit sizes and layouts which may meet the needs of pregnancy and maternity groups. No adverse impacts identified.									
Public Houses	Positive/ medium relevance	Positive/ medium relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ medium relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance
This policy aims to prevent the loss of public houses to other uses such as residential or retail. This will have a positive impact on those protected characteristics who use public houses as social facilities. Public Houses have been lost at an increasing rate over recent years. The policy also has the benefit of supporting other town centre uses and providing employment. Any loss of housing or jobs as a result of this restrictive policy would be negligible or unidentifiable due to the relatively small number of pubs remaining in the borough.									
Mini cab or taxis offices	Positive/ medium relevance	Positive/ high relevance	Positive/ high relevance	Neutral/ low relevance	Positive/ medium relevance	Positive/ high relevance	Neutral/ low relevance	Positive/ high relevance	Positive/ high relevance
This policy seeks to ensure that mini and taxi cab offices are well lit at night with good CCTV facilities (as well as being appropriately located in relation to other traffic, cyclists and pedestrians. This is formulated to ensure that night time security problems are reduced which is of relevance to most protected characteristics particularly those who may suffer from harassment and hate crimes. No adverse impacts are identified.									
Hot food take-away shops	Positive/ High relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ Low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance
This policy is intended to restrict new hot food take-away shops within 400 metres of a school and to limit the percentage of these shops in the town centres and shopping parades of the borough. The policy is in response to high levels of obesity in school children. The policy is likely to have a positive impact on the Age group. By improving health at this early stage long term impacts of obesity into old age would be reduced. The policy is not able to reduce the existing number of take-away food shops so an impact on other equalities groups, if any were to be identified, would be limited. No adverse impacts identified.									

	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and maternity	Race	Religion or belief	Gender/ Sex	Sexual orientation
Lighting	Positive/ High relevance	Positive/ High relevance	Positive/ High relevance	Neutral/ low relevance	Positive/ High relevance	Positive/ High relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ High relevance
This policy requires a high standard of lighting to provide appropriate lighting for public areas. This will improve accessibility and security. No adverse impact identified.									
Alterations and extensions to existing buildings including residential extensions	Positive/ medium relevance	Positive/ medium relevance	Positive/ medium relevance	Neutral/ low relevance	Positive/ medium relevance	Positive/ medium relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ medium relevance
This policy seeks for the first time to ensure that room sizes in extensions to dwellings meet the new room size standards set out in the London Plan. This will ensure that extensions meet the requirements of future occupiers. The policy also seeks privacy and security in dwellings which has a positive impact on groups who may suffer harassment. No adverse impacts are identified.									
Housing Design, Layout and Space Standards	Positive/ High relevance	Positive/ high relevance	Positive/ medium relevance	Neutral/ low relevance	Positive/ High relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ medium relevance
This policy applies the dwellings standards in the London Plan which seek to ensure that new dwellings meet the appropriate standards for future occupation, including lifetime homes and wheelchair standards, room sizes and the need for privacy in family size dwellings. It will have a positive impact on protected characteristics that require appropriate physical facilities. The policy also seeks privacy and security in dwellings which has a positive impact on groups who may suffer harassment and hate crimes. No adverse impacts are identified.									
Development on Infill Sites, Backland Sites, Back	Positive/ high relevance	Neutral/ low relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ high relevance

	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and maternity	Race	Religion or belief	Gender/ Sex	Sexual orientation
Gardens and Amenity Areas									
This policy restricts the development of separate dwellings on private back garden areas which is a new issue dealt with the DMLP. It is of relevance to age groups by protecting garden areas from development and preserving place for children to play. The policy also seeks privacy and security in dwellings which has a positive impact on groups who may suffer harassment and hate crimes. No adverse impacts are identified.									
Public Realm	Positive/ high relevance	Positive/ high relevance	Positive/ medium relevance	Neutral/ low relevance	Positive/ high relevance	Positive/ medium relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ medium relevance
This policy seeks to ensure a safe and accessible public realm for all. This is importance for those groups that require physical access and to those who may suffer from harassment and hate crimes. No adverse impacts are identified.									
Public Conveniences	Positive/ high relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance
This policy will require large new developments expected to attract a high level of visitors to provide public conveniences. This will be of benefit for those groups who require good and easy access to facilities. No adverse impact identified.									
Shopfronts, signs and hoardings	Neutral/ low relevance	Positive/ high relevance	Positive/ medium relevance	Neutral/ low relevance	Positive/ high relevance	Positive/ medium relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ medium relevance
This policy requires new shopfronts to provide disabled access. It restricts solid roller shutter blinds in order to provide better night time security in shopping areas. This is of relevance to disabled groups, and people with buggies, and to those protected characteristics that might experience harassment and hate crimes. No adverse impact identified.									
Hotels	Neutral/ low relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance
New hotel developments are required by this policy to be located with good transport accessibility and with at least 10% of bedrooms wheelchair accessible. This will benefit groups of people who are disabled. No adverse impacts are identified.									

	Age	Disability	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and maternity	Race	Religion or belief	Gender/ Sex	Sexual orientation
Innovative community facility provision	Positive/ high relevance	Positive/ high relevance	Positive/ medium relevance	Neutral/ Low relevance	Positive/ medium relevance	Positive/ medium relevance	Positive/ high relevance	Neutral/ low relevance	Positive/ medium relevance
The multiple use of community facilities promoted by this policy will be of positive benefit to all those protected characteristics who need to use meeting facilities. No adverse impacts identified.									
Nurseries and Childcare	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance
This policy aims to ensure an appropriate level of nursery and childcare provision exists and is spread equitably across the borough. And also that it is of a good standard with suitable play facilities. This is of positive benefit to young children and pregnancy and maternity groups. No adverse impacts identified.									
Places of Worship	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Neutral/ low relevance	Positive/ high relevance	Neutral/ low relevance	Neutral/ low relevance
This sets out the criteria for granting planning permission for new places of worship. The policy will give certainty to faith groups when considering new premises for locating places of worship and avoid difficulties when places of worship are inappropriately located.. Detailed discussion of the policies that protect industrial land from changes of use – including to places of worship where some groups seek to locate is discussed in the main part of the document. The policy seeks to mitigate an adverse impact in this respect in line with Core Strategy Action Plan									

Appendix 2: EIA of Core Strategy Options Report 2009

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1. Introduction

1.1 What is an Equalities Impact Assessment?

- 1.1 An Equality Impact Assessment or EIA is the process of systematically analysing a proposed or existing policy or strategy to identify what effect, or likely affect will follow from the implementation of the policy for different groups in the community. Similarly it can be the process for analysing the impact of the delivery of a service or function on different groups in the community.
- 1.2 Equality Impact Assessments are concerned with anticipating and identifying the equality consequences of particular policy initiatives and service delivery and ensuring that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures.

2. Management of the Equalities Impact Assessment

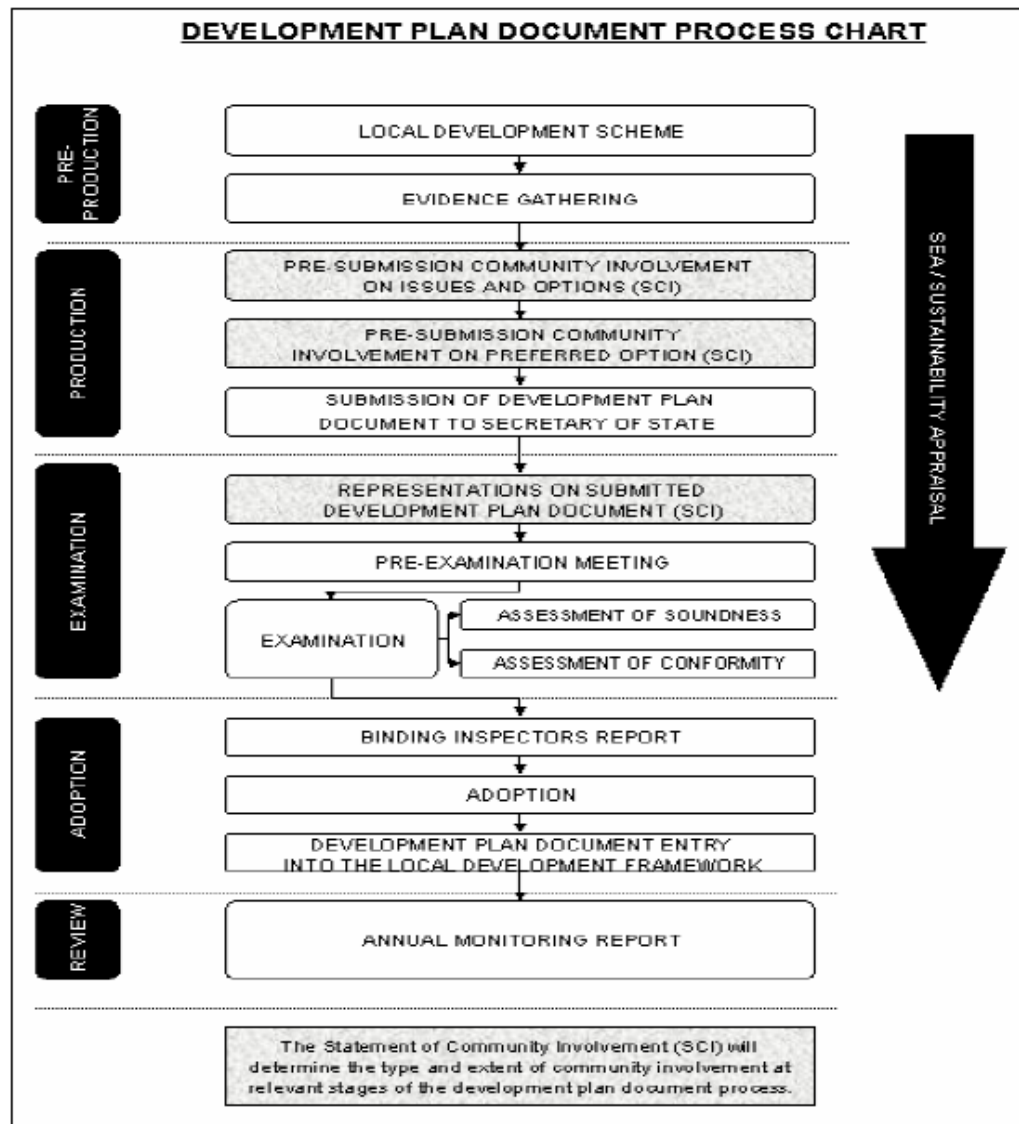
- 2.1 The assessment was undertaken by the Planning Policy Team in the Planning Service of the Regeneration Directorate, by Rosemary Duckworth Senior Policy Planner and Wilma Daniel, Policy Planner and will be evaluated by the Corporate Equalities Team. After public and stakeholder consultation the Equalities Impact Assessment will be reviewed.

3. Assessment aims and objectives

- 3.1 The objective of the Equalities Impact Assessment will be to gauge the impact on equalities groups of the suite of broad policy options presented in the Core Strategy Options Report, which will guide and promote the physical regeneration of the borough, provide affordable housing, promote regeneration of town centres and the provision of new employment space, protect open space, and provide community facilities in appropriate locations.
- 3.2 The Core Strategy will, when adopted by the Council, be the main overarching planning policy document for the Council's Local Development Framework (LDF). The LDF is a suite of documents that aims to deliver specific things such as homes, jobs, transport, parks, schools and other public services, in the most appropriate and accessible locations, over the next 15 years to 2025. It provides the legal framework for the granting or refusal of planning permission, and sets out policies for the location and amount of new built development that will deliver the objectives of the Council's Sustainable Community Strategy – Shaping Our Future, 2008-2020.
- 3.3 The Core Strategy Options Report is early stage of preparation of the Core Strategy and presents policy options for public consultation. Diagram 1 shows the stages of preparation of the documents that form part of the LDF. The Core Strategy is at an early stage called 'Pre submission Community Involvement on Issues and Options'.
- 3.4 This assessment considers the following six areas or strands that are central to the equalities agenda.

- Gender
- Race and Ethnicity
- Disability
- Age
- Sexual Orientation and
- Religion and Belief systems

Diagram 1 Stages in the Preparation of the Core Strategy



4. Scope/focus of the Equality Impact Assessment and assessment of relevance

4.1 The table below sets out the initial assessment of the relevance of equalities issues to the Core Strategy and its potential impact on different groups within society. This is the start of scoping the impact assessment and follows the guidance contained in the London Plan Supplementary Planning Guidance Document 'Planning for Equality and Diversity in London' (October 2007) in order to determine the answer to the two key questions.

- Could these policies affect some groups in society differently?
- Will these policies and the way they are implemented promote equal opportunities?

Lewisham Core Strategy Options Report Equality Impact Assessment scoping			
Equalities category	Equalities legislation	Assessment of potential impact- high, medium, low or no impact	Reason for this assessment
Gender	Sex Discrimination Act Equal Pay Act	High	<p>Many women in order to balance work and domestic responsibilities need access to employment and training closer to home with access to affordable childcare. Many women make local journeys and need convenient, affordable and safe public transport, safe and accessible walking routes and easy access to local services. Women are more likely to live in social housing due to lower wages and higher levels of part-time employment which may mean a reduction in the choice and quality in housing accessible to them. There are concerns about crime and personal safety at night, in the public realm, and alone on public transport.</p> <p>Core Strategy Options likely to be relevant to this group are policies for the provision of housing, access to local employment opportunities, good public transport, the provision of community facilities, and the design of the public realm to reduce crime and the fear of crime.</p>

Lewisham Core Strategy Options Report Equality Impact Assessment scoping			
Equalities category	Equalities legislation	Assessment of potential impact- high, medium, low or no impact	Reason for this assessment
Race	Race Relations Act Race Relations (Amendment) Act	High	<p>Black and Ethnic Minority (BME) groups tend to live in deprived areas with poor access to social facilities access to and lack private transport. Many BME groups experience discrimination in the labour market especially young black men and so lack access to employment. Many BME families experience overcrowding and poor housing conditions due to cost of housing and family size. There are concerns about fear of crime, abuse and personal safety. Relevant policies for this group will include housing provision, access to employment and training, the provision of community facilities, and the design of the public realm to reduce crime and the fear of crime.</p> <p>In respect of gypsies and travellers there is a lack of permanent sites in London and they are often located poorly and so barriers to education, employment and access to social and health facilities are experienced. There is a government requirement to include policies in the Core Strategy for the provision of sites.</p>
Disability	Disability Discrimination Act 2005 (DDA)	High	<p>Disabled people are more likely to experience worklessness and live in unsuitable and inaccessible housing, due to shortages of suitable housing and, despite improvements, difficulties with public transport. Training and education facilities may be inaccessible.</p> <p>Policy options relevant to these groups will be the provision of appropriate and accessible housing, public transport, and access to employment and training opportunities, and to community facilities.</p>

Lewisham Core Strategy Options Report Equality Impact Assessment scoping			
Equalities category	Equalities legislation	Assessment of potential impact- high, medium, low or no impact	Reason for this assessment
Age	<p>Relevant employment legislation</p> <p>Disability Discrimination Act</p>	High	<p>Children and young people may experience poverty and social exclusion due to high levels of worklessness in deprived areas, and as a result live in poor quality housing, with a lack of access to play facilities and open space. They may be vulnerable to crime, and accidents on the street and need safe public transport.</p> <p>Policy options relevant to children and young people are the provision of housing, including affordable housing and housing mix for family accommodation, access to employment for parents to reduce deprivation levels, availability of open space and play facilities, the quality of street design, safe and accessible public transport, and good design to reduce crime and the fear of crime.</p> <p>Older people are more likely to live in poverty and suffer low quality or inappropriate housing. They may be isolated and have security concerns both at home and on the street. They may experience discrimination in access to employment and in order to access facilities need cheap and safe public transport. Public realm accessibility is an issue as is a need for community facilities and/or meeting places to reduce isolation and vulnerability.</p> <p>Policy option relevant to older people include provision of housing designed to lifetimes homes standard, access to employment, quality of street design and the public realm designed to reduce the fear of crime, provision of community facilities, and safe and accessible public transport.</p>

Lewisham Core Strategy Options Report Equality Impact Assessment scoping			
Equalities category	Equalities legislation	Assessment of potential impact- high, medium, low or no impact	Reason for this assessment
Sexual orientation	Relevant employment legislation	Low	All improvements to infrastructure facilities, design, housing, natural and physical environment could have some impact on this group. There are specific issues such as concern for personal safety and fear of crime and harassment in the public realm. Most policies outlined above will have some impact on this group. The most relevant policy is good urban design to reduce crime and the fear of crime.
Religion and belief system	Relevant employment legislation	Medium	<p>Many faith groups may need appropriate housing due to family size. Access to places of worship and specialist community facilities is an issue for this group.</p> <p>Main policies relevant for this group are policy options to provide a mix including family sized housing, and the issue of the provision of buildings for faith groups (options for provision of community facilities), and public transport to access these buildings.</p>

5. Assess relevant data and research

- 5.1 A range of national, regional and local data was analysed and considered which resulted in the policy directions of the Core Strategy Options Report. This information is summarised below.
- 5.2 The Core Strategy is of relevance to the entire borough. However specific regeneration areas are identified, so the policy options will have different impacts on different parts of the borough, and on equalities groups who, as identified in the scoping section of the report above tend to live in areas with greater levels of deprivation.
- 5.3 The Core Strategy is required to be 'in general conformity' with the London Plan and National Planning Policy Guidance and Statements unless local circumstances dictate otherwise and evidence can be provided to this effect.

- 5.4 The requirements from the London Plan relevant to this Equalities Impact Assessment are summarised as follows:
- Opportunity areas for Deptford Creek and Lewisham-Catford-New Cross as a focus for housing and jobs
 - An annual housing target of 975 dwellings during the period 2007/08 to 2016/17 and an indicative capacity range of between 310 and 550 dwellings between 2017 and 2026/27
 - With the London town centre categorisations, Lewisham and Catford town centres are designated as major centres and Blackheath, Downham, Forest Hill, Lee Green, New Cross and Sydenham as district centres
 - Areas around the Surrey Canal Road and at Bromley Road are designated as Strategic Industrial Locations which provide land for uses such as waste transfer and processing, public utilities (e.g. bus garages), and industrial uses
 - Significant areas of the borough are identified as Metropolitan Open Land and with the 'Blue Ribbon Network' (Ravensbourne River).
- 5.5 The Council will additionally designate and protect areas of local significance such as, local shopping centres, local employment locations, areas of local open space and sites of nature conservation importance.
- 5.6 The Core Strategy Options Report proposes two main future scenarios for public consultation as to how the borough will accommodate the projected growth in population of the borough, and the forecasts made by the Greater London Authority for economic growth.

Strategic Spatial Option 1 seeks to ensure and support borough-wide regeneration growth. Essentially it goes beyond the requirements of the London Plan by designating a regeneration and growth corridor in the Deptford/New Cross area which is identified as an area suffering from significant social and physical deprivation. It allows the development of six major sites in this area, four of which are considered by the Greater London Authority (GLA) to be Strategic Industrial Locations, as 'Mixed Use Employment Locations' which would replace the industrial floorspace with higher density business space designed to meet GLA employment growth projections. New housing, new community, leisure and small scale shopping facilities, improved urban and greener environments would also be provided in a better connected, well designed environment. It allows for housing numbers to go beyond the London Plan requirement to 21,650 new dwellings by 2025.

Strategic Spatial Option 2 proposes housing growth to meet London Plan targets (14,550 dwellings by 2025) and does not involve such extensive regeneration in the Deptford/New Cross area by proposing just one Mixed Use Employment Location in Deptford/Creekside. This results in the retention of all the traditional warehousing and industrial space around the Surrey Canal Road and at Oxestalls Road.

Both options propose the redevelopment of Convoys Wharf for a large mixed use development, the regeneration of Lewisham and Catford Town Centres and the Deptford Creekside Opportunity Area. Small town centres are designated as 'activity

hubs' and 'local hubs'. The character of the residential areas and Conservation Areas will be preserved. Bellingham and Downham wards are identified as being in the worst 10% wards in England according to the Indices of Multiple Deprivation. Regeneration projects will continue estate renewal and build on existing projects such as the Downham Healthy Lifestyle Centre and Bellingham Sure Start programme.

Neighbourhood and local shopping centres and parades, along with a range of community and recreational facilities would be provided, retained and protected.

5.7 The Core Strategy Options Report also presents a set of 46 policy options around housing, employment land, open space, etc. These are listed and summarised in Appendix 1 to this report together with an assessment of their relevance to equalities issues in relation to each equalities group. Appendix 1 to this Report should therefore be read in conjunction with the research and demographic information presented below.

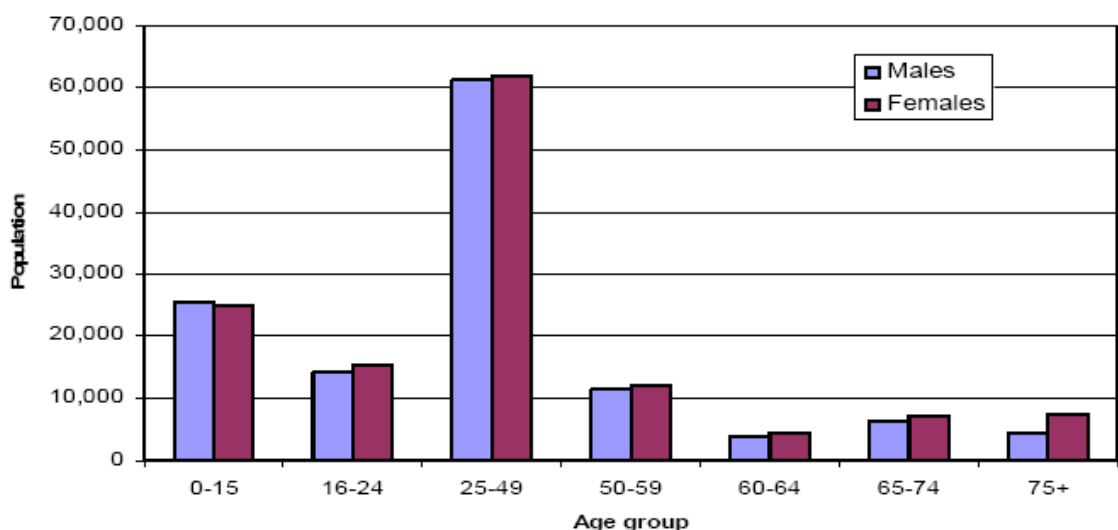
5.8 Population and Demographics

Mid Year Population estimates (ONS 2007) state that the borough is home to approximately 258,000 people and 113,000 dwellings. The population is expected to increase by approximately 25,000 people up to 2016. This would represent a 10% rise in 10 years. The borough is considered to be the 39th most deprived local authority area in England with pockets of deprivation in most areas but significantly concentrated in the southern wards of Bellingham, Rushey Green, Downham and Whitefoot, the northern wards of Evelyn, New Cross, Telegraph Hill and parts of Brockley, and Lewisham Central.

5.8.1 GENDER

In Lewisham, 51.3% of the population are female residents and 48.7% are male residents. There are slightly more female than male residents in almost every age band and women are most over represented in the over 75 years age group.

Population by gender (GLA, 2006)



Currently there are around 6,000 more women than men in Lewisham; by 2026 the gap is predicted to rise to around 10,000. However, the older male population is predicted to rise at a higher rate than the older female population. By 2026 the male population aged over 75 years is predicted to increase by 14% while the equivalent female population is predicted to fall by 5% (Gender Projections 2006 – 2026 (GLA)).

The Census 2001 showed that in Lewisham borough there were 11,242 lone parent households with dependent children. The highest numbers of these were in Evelyn and New Cross Wards with 916 (8.1%) and 861 (7.6%) families respectively. Bellingham, Downham, Telegraph Hill and Sydenham wards each had more than 700 lone parent families.

Assessment Scoping

Housing theme

The Equality Impact Assessment Scoping shows that housing provision has a high impact on this equalities group.

Deptford, Lewisham Town Centre and Bellingham are the areas in the borough most likely to contain unsuitably housed households (Lewisham Housing Survey 2007, Strategic Housing Market Assessment 2008).

The Lewisham Strategic Housing Market Assessment shows that the model of housing requirements demonstrates a very diverse pattern. There is a clear need for smaller market dwellings but a surplus of market dwellings with three bedrooms or more. There is also a high requirement for smaller social rented dwellings and for social rented dwellings with four or more bedrooms. There is an assessed need for social housing of 9,757 dwellings over the next five years with a clear requirement of one, two and four plus bedroom dwellings.

The Core Strategy is required to be in conformity with London Plan policies and has included options to provide 'Lifetime Homes' which are intended to be adaptable to changing needs over a lifetime of occupancy, and a requirement for 10% of all new housing to be wheelchair accessible or easily adapted for those using a wheelchair. This means that new homes will be capable of accommodating prams and buggies.

Access to employment theme

The Equality Impact Assessment Scoping shows that access to employment has a high impact on this equalities group.

Despite being the third most populous inner London borough, Lewisham's underlying economy is one of the smallest in London. The largest employers is the Public, Education and Health Services sector, followed by Distribution, Hotels and Restaurants and Banking and Finance. Town centres are key locations of economic activity (Lewisham Employment Land Study 2008).

The overall employment figure for Lewisham including those working in and out of the borough was 132,700 at Development 2005, with an increase of approximately 2,700 between 2000 and 2005. Only 31% of the residential population are employed in the

borough (Lewisham Employment Land Study 2008). The overall employment level is below the national average. In July 2007 the borough wide unemployment rate was 3.7% which was above the Greater London average.

The Census 2001 showed that Downham, Whitefoot Bellingham and Evelyn wards had considerably fewer people working in professional, and technical occupations than in other wards in the borough (Downham Ward 2.4%, Whitefoot and Bellingham Wards 2.9%, Evelyn Ward 3.8%). Otherwise no specific pattern of employment could be seen.

Transport theme

The Equality Impact Assessment Scoping shows that public transport has a high impact on this equalities group.

Access to a car in Lewisham is significantly lower compared to London with 43% of residents having no access to a car or van. There are significant variations throughout the Borough's wards ranging from over 50% households without a car in the more deprived wards (Brockley, Evelyn and New Cross) to under 33% in Catford South, and Grove Park (Census 2001). Walking will be the most important mode of travel at the local level and offers the potential to replace short car trips and therefore the quality of the street network is very important.

Evidence produced by the Planning Service has identified the Deptford New Cross area as needing significant improvements to the connectivity of the street network and accessibility to local community facilities (Deptford/New Cross Masterplan covering areas in Evelyn and New Cross wards). Many opportunities exist to improve transport infrastructure over the next five years and beyond, which will contribute to accessibility improvements. These include the extension of the East London Line, additional capacity for mainline trains through Thameslink, and major station improvements at Lewisham, Catford, Deptford and Forest Hill.

Community facilities theme

The Equality Impact Assessment Scoping shows that access to community facilities has a high impact on this group.

The Planning Service has conducted a preliminary assessment of social infrastructure needs arising from proposed new development in the Core Strategy Options Report covering education, health, leisure, recreation, community facilities, open spaces and emergency services. The assessment was conducted using a standard model produced by consultants for the Thames Gateway called the Social Infrastructure Framework (SIF) model. The SIF working paper has identified the following possible deficiencies using this model:

- Secondary school places, although the Building Schools for the Future programme will create a surplus by 2012
- Primary healthcare and one-stop primary healthcare centre with this increasing by 2012

- Shortfall in the amount of community centre provision although some is under-used.

Design of the public realm theme

The Equality Impact Assessment Scoping shows that the design of new development has a high impact on this equalities group.

Crime and the fear of crime are regularly mentioned in surveys of issues that concern local residents. Although Lewisham has generally lower levels of crime than most of the other inner London boroughs, fear of crime is a key issue (Metropolitan Police Service and Lewisham Residents Survey 2007).

The Core Strategy Options Report proposes that new development is designed to reduce the opportunity of crime, improve the street scene and the connectivity of the street network, and promotes Mixed Use developments that ensure high levels of natural surveillance by ensuring a variety of users throughout the day and evening.

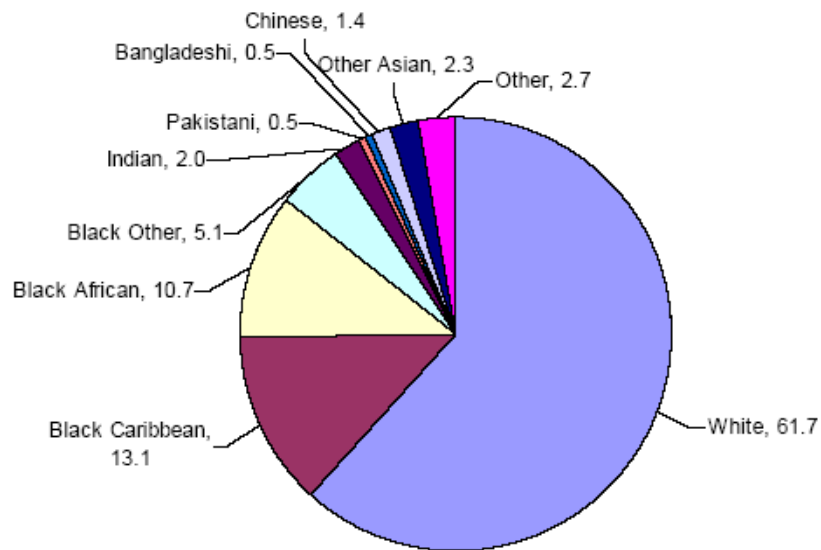
5.8.2 BLACK AND MINORITY ETHNIC COMMUNITIES

Lewisham is a diverse borough, with almost 40% of the population coming from BME communities. This diversity is also evident in our local schools, where 69% of the school population is from minority ethnic groups.

There has been a growth in all groups of the black and minority ethnic (BME) population from 39% of households in 2001 (Census 2001) to 49.4% of households in 2007 (Lewisham Strategic Housing Market Assessment) who are largely focussed in the northern and central parts of the borough.

Over the next two decades the borough is expected to become more diverse, with the BME population projected to rise to 45% by 2026. In particular, the Black Caribbean and Black African populations are expected to increase, with the Black African population experiencing the greatest growth. The total number of residents within the Black Other, Indian and Asian Other groups will also grow; however, the Chinese, Pakistani and Bangladeshi populations are projected to remain static.

Percentage of population by ethnic group (GLA, 2006)



The total number of people in the White population approximately remains the same, but the White population as a percentage of the total population will continue to decline, reflecting the growth of the BME population in relative numbers. The GLA have projected that the White population of Lewisham will be 55% in 2026, compared to 66% in 2001.

Ward data from the 2001 Census showed that Evelyn and New Cross wards had the highest numbers of BME people (63.1% and 62.4% respectively). Rushey Green, Telegraph Hill, and Brockley Wards each had just over 50%.

The London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (March 2008, Fordham Research for the GLA) found a minimum additional pitch requirement for Lewisham of four and a maximum residential pitch requirement of 16.

Ethnic projections – percentage of population (GLA, 2006)

<i>Ethnic group</i>	2001*	2006	2011	2016	2021	2026	Overall change
White	66.0	61.7	58.9	57.1	55.9	55.0	-11.0
Black Caribbean	12.2	13.1	13.5	13.9	14.1	14.3	2.1
Black African	9.1	10.7	11.8	12.4	12.6	13.2	4.1
Black Other	4.6	5.1	5.5	5.8	6.1	6.3	1.7
Indian	1.4	2.0	2.4	2.6	2.7	2.8	1.4
Pakistani	0.4	0.5	0.5	0.5	0.5	0.5	0.1
Bangladeshi	0.5	0.5	0.5	0.4	0.4	0.4	-0.1
Chinese	1.4	1.4	1.4	1.5	1.5	1.5	0.1
Other Asian	2.1	2.3	2.5	2.6	2.7	2.7	0.6
Other	2.3	2.7	2.9	3.1	3.2	3.3	1.0

*2001 Census

Assessment Scoping

The Equality Impact Assessment Scoping shows that housing, access to employment, transport and community facilities themes have a high impact on this equalities group as does the design of new development and the public realm in reducing crime and the fear of crime. The information for each theme given in paragraph 5.6.1 is relevant and should be referred to.

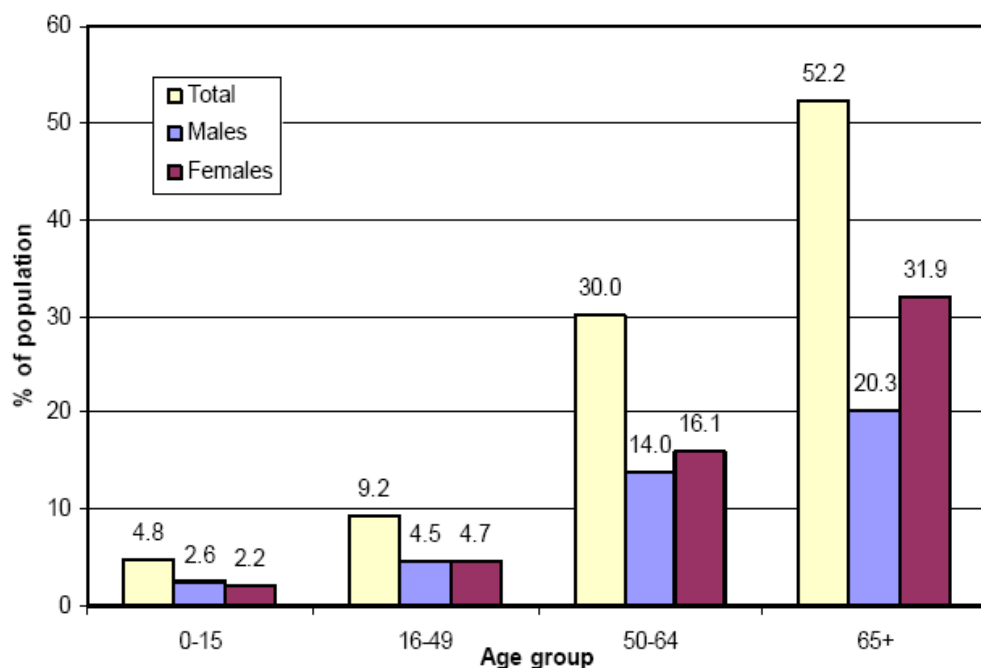
5.8.3 DISABILITY

The 2001 Census showed that Lewisham has 38,823 people or 15.6% of the population had a 'limiting long term illness. This compared to London as a whole at 15.49% and England at 17.93%.

Assessment Scoping

The assessment concluded that access to all facilities, including appropriate housing, employment, education and training, public transport and community facilities, and the quality and accessibility of the public realm all have a high impact on this equalities group. Information on these themes, relevant to this group is to be found in paragraph 5.6.3. Comments from consultation exercises (see below) refer to the physical quality of the street realm such as dropped kerbs, paving, suitable street furniture, access to public facilities, which are not the focus of the Core Strategy Options Report.

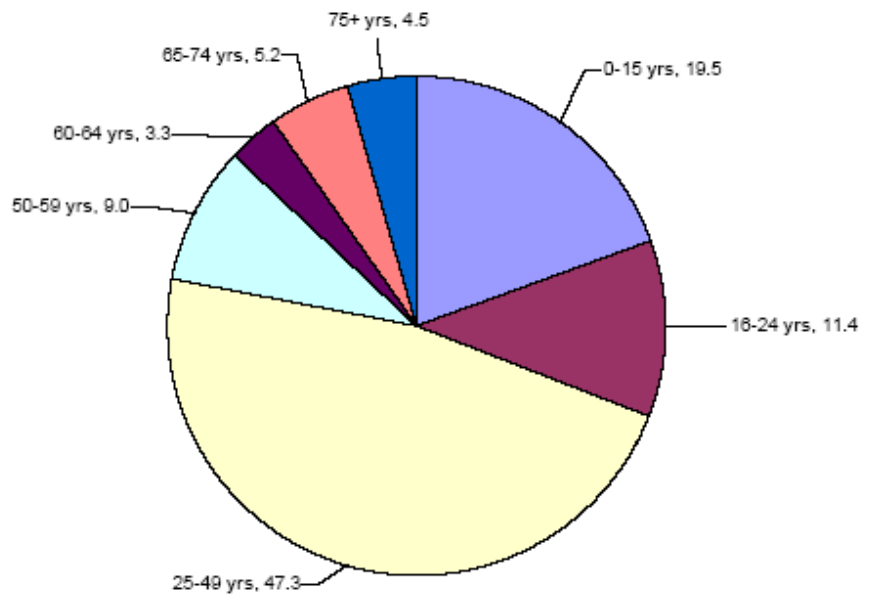
Percentage of population with a LLI, health problem or disability (ONS, 2001)



5.8.4 AGE

Lewisham has a relatively young population; almost a fifth of its population is in the 0–15 years age group. Approximately one in seven people in the borough are aged over 60, compared to around one in five nationally.

Percentage of population by age (GLA, 2006)



In percentage terms, by 2026 the overall make-up of the population by age band remains relatively unchanged. However, there are clear trends within individual age bands. The 50–59 and 60–64 age bands are projected to increase by 37 percentage points and 47 percentage points respectively as Lewisham’s relatively young population ages. The 16–24 age band is the only age band to decline.

Assessment Scoping

The Equality Impact Assessment Scoping shows that housing, access to employment, transport and community facilities themes have a high impact on this equalities group as does the design of new development and the public realm in reducing crime and the fear of crime. Information on these themes are to be found in paragraph 5.6.1 above.

The assessment scoping also showed that in addition the provision of open space and playing facilities is of great concern to young people. Information on the amount of provision is given below.

Open Space Theme

Open Space makes up almost 20% of the borough’s land area of which

- 415 ha is classified as Public Open Space
- 69 ha is classified as green corridor (rail side land)

- Almost 300 ha is classified as Metropolitan Open Land (i.e. open space considered to be of strategic importance for the whole of London) and
- Just over 300 ha is designated as Sites of Nature Conservation Importance.

The existing capacity of open space in Lewisham amounts to 16.96 square metres per person or 1.695 ha per 1,000 population. It is estimated that in order to maintain the current per person ratio of 16.95 square metres, in the face of projected population increases Lewisham must increase its public open space provision by 9.6 ha by 2012.

The Open Space Strategy for Lewisham (2005-2010) sets out the local standard of 1.7 ha per 1000 persons which would require an extra 10.9 ha of public open space provision by 2012, and identifies areas of deficiency in public open space.

The Core Strategy proposes to retain and protect the Open Spaces in the borough. The Open Space Strategy for Lewisham identifies areas of open space deficiency that could potentially be improved with the provision of small new open spaces as part of the mixed use employment developments proposed in the Core Strategy Options Report in the Deptford/New Cross area, although it is considered unlikely that an increase of 9.6 ha or 10.9 ha by 2012 is practically achievable.

5.8.5 **SEXUAL ORIENTATION**

In Britain there is relatively little national research on the lives of lesbians, gays and bisexuals. The only nationwide surveys that have already provided information on sexual orientation are the Census and the National Survey of Sexual Attitudes and Lifestyle (NSSAL).

The NSSAL in 2000 found that approximately 5% of men and women in Britain stated that they had ever had same-sex partners. This figure rose to over 10% for men and almost 7% for women who lived in London.

The Census in 2001 published more localised data, including the number of same-sex couples that were living together in each local authority. This reported that Lewisham has the 12th largest number of same-sex couples sharing a home, with 1,070 people describing themselves as living with a same-sex partner.

In the meantime, there are various other estimates of the extent of the gay and lesbian population in Lewisham. Using central government's guideline of 6% of the total population, the gay and lesbian population in Lewisham would be more than 15,000. This estimate does not include bisexual adults, or people who come to Lewisham to work or socialise, so the true extent of the LGB communities may well be greater than this. In 2007 a question on sexual orientation was added to the Council's Annual Residents Survey for the first time. Over 1,000 residents were randomly selected from across the borough to participate in these face-to-face interviews, of which 2% identified themselves as being gay, lesbian or bisexual.

Assessment Scoping

The Equality Impact Assessment Scoping found that the impact of the Core Strategy Options Report on this group would be low apart from improvements to the design of new development and the public realm to reduce crime and the fear of crime. It is likely however that improvements under all the identified themes would be of benefit to members of this equalities group.

5.8.6 RELIGION AND BELIEF SYSTEM

Prevalence of religion or faith (Census, 2001)

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religions	No religion	Not stated
Inner London	54.57	1.00	1.90	1.78	11.67	0.51	0.44	18.34	9.79
Camden	47.10	1.31	1.53	5.63	11.57	0.22	0.59	22.02	10.03
Hackney	46.56	1.14	0.81	5.29	13.76	0.85	0.57	19.03	11.99
Hammersmith and Fulham	63.65	0.77	1.09	0.79	6.85	0.19	0.43	17.64	8.59
Haringey	50.07	1.05	2.05	2.64	11.26	0.33	0.52	19.98	12.09
Islington	54.21	1.05	1.00	1.05	8.11	0.34	0.41	23.72	10.12
Kensington and Chelsea	61.96	1.16	1.00	2.23	8.41	0.20	0.57	15.25	9.20
Lambeth	58.82	0.86	1.27	0.45	5.39	0.16	0.47	21.70	10.88
Lewisham	61.25	1.09	1.69	0.28	4.62	0.17	0.46	20.40	10.05
Newham	46.84	0.65	6.93	0.20	24.31	2.83	0.27	9.01	8.95
Southwark	61.58	1.07	1.09	0.41	6.85	0.24	0.36	18.51	9.89
Tower Hamlets	38.64	0.99	0.79	0.93	36.40	0.35	0.27	14.19	7.44
Wandsworth	61.81	0.71	2.28	0.65	5.20	0.25	0.36	19.99	8.77
Westminster	55.05	1.32	1.93	4.27	11.77	0.22	0.52	16.16	8.76

The table above gives data on the prevalence of different religions across London. This is based on 2001 Census data, the first census to include a question on religion. The table and graph below show that the diversity of Lewisham's population in terms of ethnicity is not reflected in its religions and faiths. Lewisham has the lowest proportion in Inner London of people with a religion other than Christianity (8%), with the highest being 40% in Tower Hamlets and the Inner London average being 17%. More specifically, Lewisham has the lowest proportion of Muslim people in Inner London (4.6%), and the second lowest proportion of Jewish and Sikh people. Although Christianity is clearly the most prevalent religion in the borough (at 61% it is the fifth highest proportion in Inner London), Lewisham also has a relatively high proportion of people (30%) either with 'no religion' or who did not state their religion when asked.

Data from the 2001 Census shows no particular pattern of geographical distribution of the various faith groups. The exception to this being Evelyn and New Cross Wards which had 7.3% and 7% respectively of Muslim people.

Assessment Scoping

The Equality Impact Assessment Scoping found that the issues for this group were housing, public transport (refer to paragraph 5.6.1) and access to appropriate community facilities and church buildings. The work being done by the Planning Service in assessing the amount of community infrastructure available is in its early days (see Community Facilities theme in paragraph 5.6.1).

6 Consultation

6.1 The Council is consulting on the contents of this Equality Impact Assessment at the same time as it is consulting on the Core Strategy Options Report and its Sustainability Appraisal.

6.2 The consultation on the Core Strategy Options Report is a statutory requirement and must be carried out according to the Statement of Community Involvement (SCI) which forms part of the suite of Local Development Framework documents. The SCI was published in 2006 and can be found at:

<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/StatementCommunityInvolvement.htm> .

6.3 The Government in the guidance issued for the preparation of Local Development Framework documents (Planning Policy Statement 12) states that communities should be involved as stakeholders in the preparation of the plan. The SCI at paragraph 2.3 states that the Council will consult the following sections of the Lewisham community defined as hard to reach groups:

- Children and young people
- Minority ethnic people
- Older people
- Faith/religion groups
- Gender groups
- Gay and lesbian people
- Disabled people

6.4 The Issues and Options consultation stage was the first consultation stage for the preparation of the Core Strategy. The Preferred Options consultation was the second stage of preparing the Core Strategy. A full account of the consultation for both Issues and Options and the Preferred Options can be found at:

<http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/LDFConsultation/>.

6.5 The current stage of plan preparation has built on previous consultation stages, and the comments made from the equalities groups consulted. Due to comments received from Government Office for London on various issues including the evidence base and a number presentation issues the Council is re-consulting on the preparation of its Core Strategy and hence prepared the Core Strategy Options Report.

6.6 The Planning Service has a comprehensive database of community groups who were directly informed by post of the planning proposals, including groups who meet all the above categories. Results of both consultation stages (June to December 2005 for the Issues and Options and May to July 2006 for the Preferred Options) and the equalities issues raised by various groups are summarised below, and as stated above the reports as a whole are on the website.

- Provision of social rented housing was in great demand.

- Questions about the amount of new community infrastructure that would be required to meet the needs of the increase in population and the proposed growth in housing were raised and there were concerns over where and how new community and infrastructure facilities would be provided, both in terms of such facilities as healthcare, and other community facilities, and transport provision.
- Provision of special needs and specialist housing was supported.
- There was general support for the protection and enhancement of town centres to provide accessible shopping facilities and for the protection of a core of employment locations to provide accessible job opportunities.
- Need for cycle parking areas, and improved public transport was identified.
- Good design was supported. This could range between design for new accessible housing, street facilities such as paving and visual aspects of new development.
- There was support for housing mix in terms of provision of larger family dwellings and lifetime homes.
- There was support for the Mixed Use Employment Policy but concerns were also raised by some about the loss of existing employment opportunities and industrial buildings

6.7 The Planning Service also held meetings with particular equalities groups. The Service has limited capacity to undertake large numbers of meetings, however it was hoped that this targeted selection would add to and confirm the large scale consultation results obtained by responses from the postal consultation exercise. The outcomes of these meetings are summarised below:

Sure Start Group at the Shaftesbury Christian Centre Deptford

The major concern of this group was that new housing development should provide a mix of dwellings to provide for family occupation, and that it should not be limited to small one or two bedroom flats. The other concern expressed was that community facilities, especially in Deptford and New Cross would be insufficient to support the large amount of development proposed in the Core Strategy Options Report.

Sure Start Group Bellingham

Concerns expressed about need for open space for children to play, improvements to Catford Town Centre environment. Safety and fear of crime, particularly at night was a key concern.

Pensioners Forum

This group were concerned about the following issues of relevance to the Core Strategy:

- The Bellingham area should be included in proposals for local renewal.
- The percentage of affordable housing proposed to be derived from new developments was not considered sufficiently ambitious.

Elders Summer School Goldsmiths College

People in this group were concerned about

- The quality of the streetscape and street furniture, such as public toilets, bus shelters and seating.
- Protection of local amenities such as the Broadway Theatre and also the lack of a cinema in the borough.
- Housing designed to a high standard to enable independent living in mixed communities but also appreciating differing housing needs to promote harmony.
- Promotion of bungalow style developments for elderly people.
- Sufficient support networks.
- Importance of greenery and open space.
- Importance of energy saving systems and devices such as solar panels.

Lewisham Disability Coalition

People in this group were concerned that

- All new housing development should be built to 'Lifetime Homes' standards, and accessible homes should be built on the ground floor of new developments.
- Public facilities including shops and public toilets should be accessible.
- Accommodation for voluntary groups should be provided for from planning obligations.
- General concern about the quality of the streetscape, dropped kerbs, paving and parking spaces for disabled people.

Vietnamese Group

This group who are based in the Pepys Estate area were concerned about the new mixed development being promoted by the Core Strategy at Oxestalls Road. They were

- Pleased that the area would be improved which would improve their quality of life.
- Low cost business units were seen as desirable to give their children routes into employment and therefore reduce the possibility of 'turning to crime'.
- The upgrading of business units had the potential to reduce the numbers of jobs available to local people.
- High density housing would need adequate open space that is safe for all age groups which could also provide opportunities for intercultural living, exercise, and socialising.
- Crime was a major concern limiting access to services and public spaces.
- Enhanced, safer and more pleasant routes to Deptford Green School and to Deptford High Street were needed.
- Need for a community facility to provide large and small rooms at low fees for community celebration and access to services and information.

Faith Groups including the Crofton Park Baptist Church, College Park Baptist Church and Churches in Lewisham

Points made included:

- Concerns expressed about graffiti, anti social behaviour and security issues.
- Protection of public open space and its use by as many people as possible in order to create a sense of equity.
- Flexibility of other uses to be introduced into shops that had been in long term vacancy.
- The importance of public transport networks for faith groups.
- Promoted the sharing of community meeting rooms to be used flexibly by several groups, and the needs of different faith groups for different types of buildings.
- The importance of Lewisham Town Centre as a place, its special location as a focal point for local identity, which should be developed in an iconic way to make it a genuine community asset and 'put it on the map'.

6.9 It is considered that the outcomes of these extensive consultation exercises confirms the results of the scoping exercises and the general approach taken in the Core Strategy Options Report.

7 Assessment of impact and outcomes and reducing any adverse impact

7.1 The overall assessment concludes that the Core Strategy Options Report does not result in discrimination, and most policies have a positive impact. Two potential negative impacts were identified. These results are discussed further in Appendix 1 to this report.

7.2 A potential adverse impact on faith groups was identified arising from the protection of employment land in the policy options, which the Council is entitled to do under National Planning Policy Guidance in the interests of retaining the vitality and viability of the local economy. Cheaper premises in business and industrial locations offer attractive buildings for churches and meeting rooms. The Council often enforces against these unauthorised uses in the interests of preserving modern business premises which, according to evidence prepared by the Council (Lewisham Employment Land Study 2008) are in short supply.

7.3 The Core Strategy Options Report, particularly Strategic Spatial Option 1 does, however, propose the release of considerable amounts of land, currently in sole business and industrial use for Mixed Use Employment Locations, where a wider range of community uses will be appropriate and, also proposes that a network of community facilities should be provided from section 106 planning obligations arising from large new developments. This should act to reduce the negative impacts of this policy direction, and also act to meet the concerns of some community groups reported in the consultation section of this report that the development of housing on the Mixed Use Employment Locations in the Deptford/New Cross area would result in

pressure being put on the capacity of local community facilities and the transport network.

- 7.4 A further potential adverse impact was identified in the development of the Mixed Use Employment Locations in Strategic Spatial Option 1 which will result in the loss of some traditionally provided workshop, industrial and warehousing floorspace which will result in some firms needing relocation. There will be a consequent loss of some existing local employment opportunities, as some of these businesses will not wish to take space in the new business developments for various reasons. The figures are not available to gauge the number of people in equalities groups employed in these firms. These jobs should be replaced in new business floorspace, with the potential to offer wider and more varied jobs and training opportunities. The negative impact of the loss of premises for some businesses could be mitigated by support provided by the Council and other development agencies for the relocation of these firms into other premises close by.
- 7.5 One specific suggestion arose from internal discussion during the assessment which was that parking for child buggies and prams could be required in major new development to the benefit of the Gender Equalities group. This suggestion cannot be incorporated into the Core Strategy but can be included in other more detailed documents that will form part of the Local Development Framework.
- 7.6 Options under housing and employment, transport and the provision of community facilities are likely to create a range of opportunities for the community as a whole, which would help directly or indirectly in dealing with complex issues such as poverty, social exclusion, and safety within the borough. Managing and improving the natural and physical environment will have benefits for everyone within Lewisham's diverse communities.
- 7.7 The assessment of the Strategic Spatial Options concludes that Strategic Spatial Option 1 presents the most advantageous result for equalities groups as it promotes regeneration for the whole borough. The Deptford/New Cross area in particular is the focus of extensive regeneration which will benefit equalities groups identified by this report as living in this area. The benefits of Strategic Spatial Option 2 for this area is much less marked and extensive. These benefits will however, depend on the implementation of the associated physical and social infrastructure outlined in Core Strategy Options Report. The options for section 106 planning obligations or whether to opt for the Community Infrastructure Levy are particularly important in this respect.

8. Action Plan

- 8.1 The Core Strategy is at an early stage of preparation. It will not become the formal policy of the Council until November 2010 due to the number of further stages of preparation required (see Council's Local Development Scheme (LDS) published April 2008). Until that date the Unitary Development Plan 2004 and the London Plan comprise the Development Plan for the borough used to grant or refuse planning permission.

- 8.2 The Planning Service work programme for the Local Development Framework includes the preparation of a Supplementary Planning Document which will set out the framework for the planning obligations that will be sought to meet the identified requirements of the equalities groups outlined in this report. This document is projected to be completed and adopted by November 2010 (LDS 2008) and will be a very important document aiding the implementation of the aims and objectives of the Core Strategy.
- 8.3 The provision of appropriate community infrastructure has been identified as an issue of concern to equalities groups in the Deptford/New Cross area due to the amount of new development that will be focused there over the plan period up to 2026. The Planning Service will be preparing an Infrastructure Implementation Schedule that be required to support the Core Strategy and will need to be ready for the next stage of Plan Preparation in 2009 (see Diagram 1 page 4 'Pre-Submission Community Involvement on Preferred Option' stage).
- 8.4 Other documents to be prepared include a Development Policies document that will be able to provide policies that deal with some of the more detailed concerns of equalities groups, as opposed to the rather 'broad brush' approach taken by the Core Strategy. This document is projected to be completed and adopted by January 2011 (LDS April 2008).
- 8.5 Further investigative work into the structure of employment in the industrial and warehousing premises on sites proposed for redevelopment as Mixed Use Employment Locations so as to mitigate any potential adverse impact on equalities groups will need to be undertaken. As the delivery of new development on these sites will take place probably over the entire plan period (up to 2026) and on a piecemeal basis, research into the make up of employees will rapidly become out of date. It is recommended that this work should represent an ongoing commitment by the Economic Development Service working in conjunction with the Planning Service to identify any impacts as and when development proposals come forward.
- 8.6 A contribution to the future work programme could be a programme of briefings for Regeneration Staff and other groups across the Council as to the significance and nature of the documents that make up the Local Development Framework due to their significance in providing the physical implementation framework of the Council's Sustainable Community Strategy (6 months to 1 year).

9 Formal agreement

- 9.1 This Equalities Impact Assessment will require agreement by the Planning Management Team, Regeneration Management Team, Corporate Equalities Board and Mayor and Cabinet.

10 Publication of results

- 10.1 This report will be published on the Council's website in the Equalities section and also made available for consultation and comment on the Planning web pages.

11 Monitoring

- 11.1 This document presents policy options and directions only. It is a consultation document, and members of the public are invited to make choices between the options presented and consider whether all reasonable alternative approaches to planning the future of the borough have been considered.
- 11.2 The next stage of plan preparation is a published Core Strategy (draft plan) which will make choices between the various policy options presented, and following further public consultation a submission plan followed by an independent Examination in Public. This will result in a final plan for adoption by the Council.
- 11.3 Monitoring arrangements such as the Annual Monitoring Report (AMR) will enable the Council to examine and assess more closely the implementation of policies in the Plan once they are adopted, and how they impact on equalities issues. This monitoring will also be undertaken by the Planning Management Team, Regeneration Management Team, the Corporate Equalities Board and Mayor and Cabinet. However, at this stage the policies in the Unitary Development Plan (UDP) 2004 and the London Plan represent the adopted Development Plan for the borough and which are the subject of current monitoring exercises.

APPENDIX 1 - Assessment of relevance of the Core Strategy Options Report

The content and form of the Local Development Framework is governed to a large degree by legislation. In the past planning documents dealt largely with land use issues and formed a framework around which applications for planning permission are decided. However, the new spatial planning system brought in by the Planning and Compulsory Purchase Act 2005 and associated regulations and guidance presents more opportunities to ensure that the needs of equality groups are considered within the planning process by offering a spatial context in which wider initiatives of benefit to the community may be implemented.

H = High Relevance to Equalities Issues M = Medium Relevance to Equalities Issues L = Low Relevance to Equalities Issues

Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Strategic Spatial Options							
Option 1: Borough-wide regeneration and growth	H	H	H	H	L	M	<p>This option provide large amounts of new housing, new employment and training opportunities, an improved urban environment, improved transport links, new community facilities that are likely to be of benefit to all equalities groups according to the Scoping Assessment and demographic data.</p> <p>It has the potential to provide physical and social regeneration of large areas of Deptford/New Cross which are poor in environmental quality, and which are identified in the main report as having high levels of deprivation. It will therefore have a high positive impact. The regeneration of these areas will be in addition to the regeneration strategy pursued in Option 2. The intention of Option 1 is to provide new forms of employment, new housing in line with Core Strategy aims (up to 20,000 dwellings), increase accessibility and connectivity and provide new associated community and transport facilities.</p> <p>Concern was expressed in previous rounds of consultation about the level of development proposed and whether strain would be put on community services and the transport network in Deptford/New Cross thereby resulting in a negative effect on equalities groups who may be employed in this area.</p> <p>Clearly in order to meet equalities issues the Council will also need to ensure that the appropriate level of community and transport facilities are provided commensurate with the level and intensity of housing development proposed.</p>

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
							<p>Option 1 will result in the loss of up to 134,000 m² of more 'traditional' style warehousing and industrial floorspace and its replacement by up to 106,800 m² of new employment floorspace over six sites in the Deptford/New Cross Area currently in business and industrial use. The net extra supply of floorspace will range between 74,000 m² and 174,000 m² depending on the density and type of employment development undertaken. It is expected that the new floorspace will provide a more varied range of jobs, and training opportunities while retaining a reservoir of the more industrial style of employment floorspace. Whether these jobs will be suitable for local equalities groups will depend on implementation which is hard to predict as the Core Strategy is a broad brush document and does not provide detailed guidance, but the policies do provide for new employment and training opportunities.</p> <p>A potential adverse impact is identified in that some firms will not wish to take up space in new business development and some local jobs will need to be relocated.</p> <p>The information is not available to quantify this impact on equalities groups, but action should be taken to mitigate this by assisting firms in relocation arrangements to support them through a period of adjustment.</p> <p>This Option essentially provides Borough wide growth and regeneration by the development of Mixed Use sites in Deptford/New Cross which are addition to the more modest approach to regeneration proposed in Option 2.</p>

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
							Bellingham and Downham wards are identified as areas for social regeneration which is projected to help the identified equalities groups in these areas.
Option 2: Modest approach to borough-wide regeneration based on the implementing and achieving the parameters of national and regional planning policy.	H	H	H	H	L	M	<p>This option also provides regeneration opportunities but does not include development across a number of poorly used industrial sites in Deptford/New Cross. It therefore does not have the same level of positive impact on the areas of deprivation identified in the main report.</p> <p>Nevertheless extensive development is proposed in Lewisham Town Centre and uses in and around Catford Town Centre will also be intensified. One site at Creekside will be redeveloped as a Mixed Use Employment Location.</p> <p>Regeneration under this option is expected to provide new access to housing and jobs, and provide new opportunities for equalities groups. Although the amount of new housing is expected to be about 50% of that proposed in Option 1 the Council will still need to ensure that new community facilities and services are provided and public transport is at an appropriate level to ensure no negative impact on equalities groups. It should be noted that both growth options promote mixed use developments which are likely to improve the sustainability and usability of the new developments for all equalities groups by providing for a range of uses which ensure that there is activity throughout the day and evening and thereby promoting social inclusiveness and reducing fear of crime. This option does not however promote such major redevelopment in the Deptford/New Cross area so the opportunities it presents fewer</p>

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
							opportunities for equalities groups who are identified in the main report as living in this part of the borough. Bellingham and Downham wards are identified as areas for social regeneration which is projected to help the identified equalities groups in these areas.
Core Strategy policy directions - Council's recommended options							
Providing New Homes							
Housing provision	H	H	H	H	L	M	This is of benefit to all sections of community as the policy seeks to meet and exceed London Plan target for housing over a period of ten years. Gender Groups, BME Groups, Disability and Age equalities groups will all benefit from increased access to appropriately designed housing. Religions and belief system groups will also benefit due to some of these groups having larger size families.
Affordable housing threshold	H	H	H	H	L	M	This option states that affordable housing will be sought on sites of 0.3 ha or larger or capable of providing 10 or more dwellings and that 50% of these dwellings should be affordable. This presents an increase on previous local policies and is likely to benefit most equalities groups who have difficulties in accessing housing including gender, BME, age and disabilities equalities groups.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Housing tenure	H	H	H	H	L	M	This option states that affordable housing will be given priority over other types of tenure on housing sites which is likely to benefit most equalities groups as above. The options also states that the Council will support 100% affordable housing schemes.
Housing mix	H	H	H	H	L	H	This option requires that new development provides a range of dwelling types and sizes. This is likely to benefit varying groups within the community who have differing requirements for size and type of dwelling. Comments above also apply. This option is likely to have greater relevance to religious groups due to the need of some groups for large family housing.
Lifetime Homes	M	M	H	H	L	L	This option is especially relevant to older people and people with disabilities who will be helped by ensuring that dwellings are flexible enough to be adapted for a lifetime of changing requirements for accessibility. The homes also help parents who need to gain access and store baby buggies, and therefore have a positive impact on gender groups.
Accessible housing	L	L	H	H	L	L	This option requires 10% of all new dwellings to be wheelchair accessible in line with the London Plan and encourages special needs housing provision in line with the Lewisham Strategic Housing Market Assessment. It therefore specially relevant to Disability groups, and older people.
Gypsies and travellers	L	H	L	L	L	L	The options aims to provide sites for Gypsies and Travellers using a criteria based approach to site selection with the aim of providing an appropriate site to accommodate them in line with the locally assessed need for a site.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Grow Local Economy							
Strategic Industrial Locations	M	M	M	M	L	M	Strategic Industrial Locations are intended to provide a reservoir of land that is protected for lower value uses such as waste transfer, warehousing, transport depots, and public utilities. The emphasis is therefore not on provision of jobs but the protection of London's basic infrastructure for these purposes. If these functions were not protected then there would be access issues affecting all groups in the community requiring access to transport and the disposal of waste and other basic economic functions. The option is therefore of medium relevance to gender, BME, disability, age and religious groups as the impact of the policy is likely to be indirect.
Locally significant employment areas	H	H	H	H	L	H	Providing sites for smaller business units, creative industries and other workshop units throughout the borough will benefit the local economy of the borough, and provide access to jobs and training opportunities close to home thus benefiting the whole community. A network of jobs closer to home is likely to benefit gender, BME, disabilities, and age equalities groups. Some religious communities experience difficulties in finding appropriate premises for new churches or meeting rooms and may seek to locate in small warehouse premises which are protected for business use, and the Council then takes enforcement action against these uses. Whilst this could be viewed as being disadvantageous to religious groups the Council has taken the decision to protect modern business units that are in short supply according to the evidence prepared by the Council. The Council is proposing Mixed use Employment Locations which will allow more varied uses on some employment land which could help to remedy this situation.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
New and growing business and industrial sectors	H	H	H	H	L	H	<p>The Mixed Use Employment Locations are in the Deptford/New Cross area which is identified in the main report as an area suffering multiple deprivation across a range of equalities groups including gender, BME, disabilities and age equalities groups.</p> <p>This option concerns the Mixed Use Employment Locations that are expected to provide new and important employment and training opportunities. Mixed Use developments which provide a range of uses that will be populated through the day and evening will help in reducing crime and the fear of crime which is of positive benefit to all identified equalities groups. These locations will provide opportunities for new community uses and perhaps help in providing premises for some equalities groups in particular faith communities who have had difficulties in obtaining appropriate meeting accommodation.</p>
Convoys Wharf	M	M	M	M	L	M	<p>This option refers to the proposed development of Convoys Wharf for a mix of housing, employment space and community and leisure facilities. It is expected to provide important new facilities that will benefit all identified equalities groups albeit on one large site adjacent to the Thames so it will benefit those people who live close by.</p>
Other employment locations	H	H	H	H	M	H	<p>This option concerns the retention of a network of smaller business and commercial premises that have the potential to provide a network of local business services and employment opportunities close to where people live.</p> <p>This option is therefore of positive benefit to all the identified equalities groups.</p>

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
							This option also allows for consideration of whether some premises in business use should remain in this use which could release some sites for other sorts of community use, for example meeting places for faith groups where appropriate.
Retail hierarchy	H	H	H	H	M	M	This option proposes a network of town centres that provide various retail and other facilities. It provides for local shops and shopping parades which present opportunities for niche retailers to provide specialist goods for various equalities groups. It is important for all equalities groups to be able to access these facilities and therefore has a positive benefit for all.
Location of retail development	H	H	H	H	M	M	This option locates major retail, leisure and other town centre uses within the major and district town centres. This ensures that large development is close to appropriate public transport and therefore accessible to as many sections of the community as possible without the need for private transport such as a car, particular gender and BME groups and disability groups.
Lewisham and Catford centres	M	M	M	M	L	L	This option concerns the enhancement of the status of Lewisham and Catford Town Centres and promotion and improvement of their function, character, vitality and viability. Many equalities groups will visit these centres less frequently for more major shopping trips. The enhancement of their status and function will ensure that people in the borough do not have to travel far to high quality varied facilities and that they are accessible by local public transport. Comments above in relation to equalities groups apply.
Vitality and viability	H	M	H	H	H	H	This designates certain shopping areas in Town Centres and protects them against changes of use away from retail shops and to ensure essential services are maintained.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
							<p>This option will help to protect the retail function of town centres and so protect a range of retail facilities covering the whole borough. This is of importance to enable all equalities groups to maintain access to a range and choice of local shops and provisions.</p> <p>The option will also protect of 'non-core' areas for non-retail uses but which nevertheless are important to the functioning of town centres may be important for the requirements faith groups have for buildings, and to Sexual Orientation groups using evening entertainment premises so there would potentially be places to locate.</p>
Environment and design	H	H	H	H	M	H	Good design and a high quality environment contributes to accessibility, and a reduction in crime and the fear of crime which will benefit all equalities groups.
Accessibility	H	H	H	H	L	M	This option promotes good accessibility, and the encouragement of better accessibility by public transport, and is important for all equalities groups who are disadvantaged in terms of access to transport.
Local shopping facilities	H	H	H	H	L	H	This option promotes a network of local shopping facilities and so is advantageous to most equalities groups particularly those that suffer access issues. Local shopping facilities can also provide specialist provision for local BME and faith communities.

APPENDIX 1 - Assessment of relevance of the Core Strategy Options Report

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H = High Relevance to Equalities Issues M = Medium Relevance to Equalities Issues L = Low Relevance to Equalities Issues

Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Climate change and environmental management							
Climate change and adapting to the effects	L	L	L	L	L	L	This option is concerned with mitigating and adapting to the impacts of climate change will in general benefit all sections of the community.
Sustainable design and construction and energy efficiency	H	H	H	H	L	H	This option requires new development to be designed to high and energy efficiency standards, and to reduce CO2 emissions will benefit equalities groups who are financially disadvantaged by reducing power bills, enabling the better heating of homes and contributing to overall health. These include all equalities groups but in particular gender, BME, disabilities, age and religious groups.
Managing and mitigating the risk of flooding	H	H	H	M	L	L	This option states ways of managing and mitigating flood risk. Many equalities groups live in areas of the borough that are considered more likely to be at risk from flooding in particular the Deptford New Cross Area is potentially at risk from the Thames and there are flood risk areas along the Ravensbourne Valley. It is especially important for people with disabilities that development is designed to mitigate flood risk, and also gender groups with children.
River and waterways network	L	L	L	L	L	L	This option enhancing and improving river water quality and river frontages will create a sense of place and identity that will benefit everyone in the community.
Open space protection	H	H	H	H	L	M	Protection of open spaces will provide a network of accessible open spaces, contribute to play facilities and sports provision for young people, and the overall health of the community and be of benefit to most equalities groups as identified in the public consultation exercise.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Open space provision	H	H	H	H	L	L	Provision of new open spaces will likely to improve the overall health of disadvantaged sections of the community, provide accessible recreational and sports facilities which will enhance a sense of community and wellbeing and therefore likely to benefit most equalities groups. This option identifies an area of open space deficiency in the Deptford/New Cross area where new developments could act to improve the amount of open space in the area and thereby improve access for people living in this area. Equalities groups that are relevant are gender groups, BME groups, disabilities groups and age groups.
Biodiversity	L	L	L	M	L	L	This option proposes the preservation and enhancement of biodiversity features is unlikely to have any negative impact on the equality groups. The retention of locally important habitats will be of educational value to young people in the Age Equalities group.
Waterways naturalisation	L	L	L	L	L	L	This Option which encourages proposals for the naturalisation of waterways and rivers in conjunction with the Environment Agency help in reducing flooding, and improve water quality which will be of benefit to the community as a whole.
Character and design of open space	H	H	H	H	M	M	This option ensures that new public open space is accessible and attractive is of benefit to the community in general. Design can be used to enhance safety and reduce the fear of crime thereby improving usability and accessibility. It therefore of special relevance to all equalities groups who feel vulnerable to crime and have concerns about personal safety. It is therefore of direct relevance and positive benefit to gender, BME groups, disabilities and age groups, and sexual orientation groups.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Addressing Lewisham's waste requirements	M	M	M	M	L	M	This option deals with the disposal of Lewisham's waste including the potential for energy recovery which would be beneficial to those people able to take advantage of district heating systems fuelled by energy recovery. Appropriate waste handling is of general benefit to all sections of the community.
Building a sustainable community							
Accessibility	H	H	H	H	L	M	This options promotes good transport and the ability to move around freely which is central to all the borough's population to grasp opportunities and contribute to community cohesion. Hence the policy approach and emphasis on improving public transport should, in general, be beneficial to the equality target groups as these are less likely to own or have access to a private car and rely on public transport, walking and cycling. The young and some of the elderly would be unable to drive a car. Women often do not have access to a car. However, where public transport is deemed to be unsafe (or too costly) this could prohibit use, particularly by the elderly and women. Improvements across the borough to encourage and enhance public transport addresses accessibility issues and promotes health and well being for the benefit of all sections of the community.
Parking requirements	M	L	H	L	L	L	This option promotes accessibility for people with disabilities in terms of car parking provision. However, consider incorporating a requirement that large new developments provide accessible space for parents with prams.
Transport infrastructure improvements	H	H	H	H	L	L	Improvements to the existing transport infrastructure is critical to ability of all the borough's population as a whole, and to the identified equalities groups who do not have access to private transport to move around and ensure accessibility and is also likely to benefit everyone in the community.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Freight	L	L	L	L	L	L	The approach taken to freight movement in the preferred option should result in environmental improvements for the benefit of all sections of the community. It proposes the uses of the River Thames and the Transport for London Road Network (e.g. the South Circular) as freight transport corridors. It is of low direct relevance to community groups.
Improving design for Lewisham	H	H	M	H	M	M	This option focuses on principles to design out crime will benefit groups such as women or older people and some BME and sexual orientation groups who are vulnerable to crime or have concerns about safety. In general, promoting good design for new built environment will promote feelings of safety by providing a high quality environment that is accessible, connected and legible. This will benefit and improve morale in all identified equalities groups
Conserving Lewisham's historic environment	L	L	L	L	L	L	This option preserving Lewisham's historic environment will create a sense of local identity which will benefit the community in general. It is however of low direct relevance to identified equalities groups.
The location for tall buildings	L	L	L	L	L	L	This option ensures that tall buildings are directed to areas where other tall buildings are located and close to centres of good public transport such as Lewisham and Catford town centres. It will prevent negative impacts on the character of identified heritage and open space features in and from the borough resulting in improvements in the environment for the benefit of all sections of the community.
Strategic and local views, landmarks and panoramas	L	L	L	L	L	L	This option provides effective management of strategic and local views, landmarks and panoramas. It will enhance the quality of the landscape for the benefit of all sections of the community, including the identified equalities target groups.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Lewisham's river and waterways network	L	L	L	L	L	L	This option seeks to improve visual links to the rivers and waterways network. This will improve the character and the quality and accessibility of the area to the benefit of all sections of the community, including equality groups.
Community and recreational facilities	H	H	H	H	M	H	This option provides a network of community, health, education, cultural, entertainment and arts facilities across the whole borough. This will benefit equalities groups with poor access to public transport, and low incomes. The loss of a local community facility will harm disadvantaged groups more as they have to pay more out of often limited incomes to access facilities further away. A network of these facilities will help cohesion amongst groups such as BME groups, gender groups, people with disabilities and older people who might feel isolated and contribute to improving social inclusion.
Delivering educational achievements	H	H	M	H	L	L	This option which promotes the Building Schools for the Future programme and the enhancement of the other major educational facilities in Lewisham will improve literacy rates and skills with in the borough thus benefiting everyone in the community. High quality adult and further education facilities close to home will benefit people with disabilities, gender groups, BME groups and others with limited access to travel facilities.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Healthy lifestyles and healthcare provision	H	H	H	H	H	H	This options supports the implementation of the Lewisham Primary Care Trust Commissioning Strategy Plan, ensures that the potential health impacts of development are identified and addressed at an early stage in the planning process, support local health facilities. Policies on healthcare facilities is of general benefit to all sections of the community. Equalities groups often experience difficulties in accessing and obtaining appropriate health care for the reasons identified in the main report scoping assessment.
Planning Obligations and CIL							
Section 106 Planning Obligations	H	H	H	H	M	M	Section 106 of the Planning Acts is a mechanism/tool to arrange for funds for a range of community improvements that may be required arising from new development. Developers agree to make either a financial contribution, or provide new facilities for community needs identified as resulting from any new development. The Option will have a general positive impact on the community as a whole. This option will also help to ensure that the improvements in the number and range of community facilities that will be required in association with increased population and housing provision will be met so as to ensure that the equalities groups identified in the main report are not disadvantaged and indeed positively benefit from the new development proposed. The Planning Service Works programme includes the preparation of a Supplementary Planning Document which will be based on evidence as to what will be appropriately required from developers as part of their 'planning obligation'.

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Options	Gender	BME	Disability	Age	Sexual Orientation	Religion and Belief System	Comment
Community Infrastructure Levy	H	H	H	H	M	M	CIL is a mechanism/tool to arrange for funds for delivering a range of community infrastructure facilities in the borough. It will have a general positive impact on the community as a whole. It might be considered as an alternative to S106 Planning Obligations.

Appendix 3

LOCAL DEVELOPMENT FRAMEWORK

SITE ALLOCATIONS DOCUMENT Proposed submission version

Equalities Analysis Assessment Update

March 2012



February 2012

Lead officer: John Miller/Brian Regan

Period of equality analysis:

The Site Allocations DPD will be adopted as Council Policy once all formal stages are complete. The document has a lifespan up to 2026. to run concurrent with the duration of the adopted Core Strategy DPD, the main planning policy document for the borough..

The analysis relates to the future development of specified areas of land and buildings within the borough.

The Site Allocations Document is on the Lewisham web site at:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/site-allocations/Pages/default.aspx>:

Content

1. Purpose
2. Background
3. The Equality Act
4. Equalities analysis assessment
5. Assessment of relevant data, policy and research
6. Update of the Core Strategy Equalities Impact Assessment Action Plan (2009)
7. Consultation
8. Decision/result
9. Equalities analysis: proposed actions

Appendix 1

Equality and Human Rights Commission equalities categories and definitions

Appendix 2

Statistics from the ONS

Appendix 3

Core Strategy Equalities Impact Assessment February 2009

1. Purpose

1.1 The Government requires all councils to produce a set of documents collectively known as the Local Development framework (LDF) which sets out the planning strategy and policies for an area. The Core Strategy, adopted in June 2011, is the main LDF document. The LDF will eventually replace the remaining saved policies in the Lewisham Unitary Development Plan (UDP). The Site Allocations DPD follows on from the Core Strategy and identifies sites, usually 0.25 hectares and above which are likely to be developed during the lifetime of the LDF (2011 – 2026). It should be noted that sites in Lewisham and Catford Town Centres are being included in Areas Action Plans for these centres. The Core Strategy sets out the policy context and principles for the development of the allocated sites.

1.2 The Site Allocations DPD sets out proposals for the allocation and development of sites and for designated and safeguarded sites as follows:

- Sites proposed for housing development (in line with Core Strategy Policy 1
- Local Employment Locations (LELs) (in line with Core Strategy Policy 3
- Small Mixed Use Employment Locations (MELs) designated by the Core Strategy
- Designates primary and secondary shopping areas within the Major and District Town Centres
- Designates new Sites of Importance to Nature Conservation (in line with Core Strategy Policy 12)
- Safeguards land for waste management facilities (in line with Core Strategy Policy 13)
- Safeguards land for social infrastructure provision such as schools (in line with Core Strategy Policies 19 and 20)

1.3 A full Equalities Impact Assessment (EIA) was carried out in respect of the policies in the Core Strategy in February 2009. The impact assessment was carried out at a stage when the Core Strategy was still in preparation and was presenting a series of options for each policy. All options in the document were assessed. The purpose of this Equalities Analysis Assessment is to:

- (a) assess the three new protected characteristics (gender reassignment, marriage and civil partnership and pregnancy and maternity) that were identified in The Equality Act 2010 and therefore were not assessed in 2009 (see sections 3, 4 and 5)
- (b) update of the Core Strategy Equalities Impact Assessment Action Plan from 2009 in relation to all protected characteristics (see section 6)
- (c) conduct an assessment of the new Site Allocations document (see section 8).

This EAA will be reported to Mayor and Cabinet for consideration at the same time as the results of the consultation process for the Site Allocations DPD. This Consultation process will take place in March – April 2012.

The Council is about to launch its Comprehensive Equalities Scheme for 2012-16 -. As a single equality scheme, the CES will provide an overarching framework and focus for the Council's work on equalities and help ensure compliance with the Equality Act 2010.

2. Background

2.1 The 2009 EIA identified issues across a range of protected characteristics that needed to be addressed. These issues were based on the guidance contained in the London Plan Supplementary Planning Guidance Document 'Planning for Equality and Diversity in London' (October 2007) in order to determine the impact of the policies in the Core Strategy and Site Allocations DPDs on protected equalities groups in Lewisham and were therefore consistent with the London Plan.:

2.2 The Core Strategy DPD covers the entire borough and applies new policies on changes to the physical environment such as: change of use of buildings, protection of such uses as open space, protection of existing community facilities and providing new ones, shops, offices, industrial buildings and warehouses, and the quality, amount and location of new housing development. The scoping concluded that the

following issues covered by the Core Strategy DPD were relevant to equalities groups:

- The needs of all groups to access employment and training
- Quality of housing and accessibility to housing for all groups including the provision of affordable housing
- Provision of accessible and safe public transport
- Provision of community facilities e.g. schools and places of worship
- Provision of a safe and accessible public realm to reduce crime and the fear of crime
- Provision of safe and accessible open space and play facilities
- provision of the above improvements and facilities in deprived areas of the borough to reduce social exclusion

2.4 The Core Strategy DPD provides policies at a strategic level and does not deal with the interior design of individual buildings such as community facilities or with housing allocation policies.

2.5 The overall assessment in 2009 was that the policies in the Core Strategy would not discriminate and that most policies have a positive impact.

2.6 Three potential adverse impacts were identified:

- Protection of Employment Land. The Council protects employment land (land in office, industrial and warehousing use) against changes of use in certain locations in order to protect the vitality and viability of the economy – both locally and for London as a whole. These types of buildings are popular for church groups to use as they are large and relatively inexpensive. The Council often takes enforcement action against unauthorised uses in order to preserve good quality premises for businesses.
- Designation of Mixed Use Employment Locations would result in some cases in the loss of some traditionally provided workshop, industrial and warehousing floorspace which will result in some firms needing relocation, and a consequent loss of some existing local employment opportunities due to firms either not wishing to or not able to relocate within new mixed use developments.
- Concerns of community groups arising from public consultation that the amount of new housing development proposed in Spatial Option 1 of the Core Strategy Further Options Report which provided for borough-wide regeneration and growth would place undue stress on the existing network of facilities (shops, transport, health facilities, community facilities and other services) particularly in the Deptford New Cross area where most of the new development would locate.

2.7 The Core Strategy DPD sets out the main strategic framework for the future development of the borough and sets out high level policies dealing with the location, type and quality of new development. The Core Strategy must under Planning Legislation must be 'in general conformity' with the London Plan. This means that although the policies in the Core Strategy are locally targeted and based on local evidence there must be no overall conflict with the aims of the London Plan. The policies in the London Plan may also be used to support the Council's stance on planning issues as it is formally part for the Development Plan for the Borough. As stated above in paragraph 2.1 the EIA of the Core strategy relied heavily on a document supplementary to the London Plan for the assessment of the plan on equalities issues.

2.8 The specific aim of this equality analysis assessment (previously known as Equality Impact Assessment), is therefore to identify the positive and negative impacts of the Core Strategy DPD and as a consequence the Site Allocations DPD, on three protected characteristics that were not included in the earlier Impact Assessment. The assessment will also provide an update on the Core Strategy EIA. The emphasis on the Equalities Analysis of the Core Strategy arises because the Site Allocations DPD follows on from and is essentially a document that implements the policies in the Core Strategy DPD in detail on small sites throughout the borough.

2.9 The Council has an obligation to have regard for the duties set out in the new Equality Act 2010. These duties are outlined below.

3. The Equality Act

3.1 The Equality Act 2010 became law in October 2010. The Act aims to streamline all previous anti-discrimination laws within a Single Act. The new public sector Equality Duty, which is part of the Equality Act 2010, came into effect on the 5 April 2011.

3.2 The new equality legislation covers the following protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. It also applies to marriage and civil partnership, but only in respect to eliminating unlawful discrimination and only in relation to employment. For more information on the protected characteristics, refer to Appendix 1.

3.3 The Equality Duty has three aims. It requires public bodies (including local authorities) when making decisions to have due regard to the need to:

- I. eliminate unlawful discrimination, harassment, victimisation and any conduct prohibited by the Equality Act 2010
- II. advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- III. foster good relations between people who share a protected characteristic and people who do not share it.

4. Equalities analysis assessment of the new protected characteristics

4.1 This section provides a scoping of the impact of the Core Strategy on the three protected characteristics not covered by the earlier Equalities Impact Assessment identifying both potential positive and negative impacts of the policies.

Protected characteristic	Impact (Low, medium, high) (Positive or negative)	Potential impacts
Gender reassignment	High/ positive	Particular problems are faced by this group in terms of access to public services and safety in public spaces and neighbourhoods (for example privacy, choice and dignity in using facilities such as public changing rooms in leisure centres). This group also faces problems in feeling welcome in their communities and neighbourhoods and may face hate crime, abuse and be fearful for their personal safety. Core Strategy policies likely to be relevant to this group are those concerned with the design of safer living environments by ensuring the accessibility of public transport, providing a user friendly street environment and reducing crime and the fear of crime by providing a mix of uses with lively street frontages, the overlooking of public areas etc.
	Medium/ positive	The Core Strategy has policies to ensure the provision of new community facilities and protect existing facilities.
		The Core Strategy sets out the framework for the physical provision of these facilities by the Council, private developers, housing associations and other developers. However the implementation of the policies by others, and the way these facilities are operated in practice will be vital to ensure that the needs of this group are met and the influence of the Core Strategy on these issues is limited .

Marriage and Civil Partner - ships	Medium/ positive	This protected characteristic relates to equality in employment. The Core Strategy sets out a range of opportunities for the physical provision of buildings that provide employment (office, industry, warehousing and also retail premises and community facilities such as nurseries, schools etc.).
	Low/ positive	The Core Strategy sets out policies to protect local employment sites and to replace some sites in low density employment use with high density mixed use development which will provide a greater variety of local job opportunities. This is assessed as low because although the Core Strategy can set out a framework it cannot influence the actual delivery of jobs within the employment premises built or protected as a result of

		this policy, or influence employment policies within the businesses that might occupy these buildings.
	Low/ positive	The Core Strategy protects a range of local shopping facilities ranging from larger national chains in Lewisham town centre to small local convenience stores. These shops provide a range and variety of local employment opportunities. As discussed above, the Core Strategy relates to the provision of employment premises rather than employment policies in the businesses occupying them.
	Low/ negative	The mixed use employment designations which involve the redevelopment of sites, some of which are in industrial use, will result in the loss of some traditional types of industrial employment such as car repair businesses, warehousing and printing. This should be outweighed by the provision of new employment facilities in the mixed use developments and enhance shopping facilities particularly by the support given for the regeneration of Lewisham Town Centre. As discussed above this relates to the provision of premises for jobs rather than equal employment policies for access to jobs.

Pregnancy & Maternity	High/ positive	<p>The Core Strategy has positive policies in place that will benefit people in this group by setting out a framework for providing an accessible network of community facilities, and ensuring an accessible, safe and well designed public realm.</p> <p>The Core Strategy also sets out policies for new housing development that will mean that this will be built to lifetime homes standards which should ensure they are sufficiently flexible to accommodate prams and buggies. Core Strategy policies ensure the provision of family housing (3+ bedrooms) in any new development of 10 or more dwellings.</p>
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4.2 The scoping exercise indicates that potential impacts (both positive or negative) can be grouped under the following headings:

- provision of a network of accessible community facilities
- provision of new employment opportunities and protection of buildings in which existing jobs are located.
- accessibility to safe and convenient public transport.
- design and accessibility and safety of the public realm
- provision of housing that can accommodate the needs of a family with young children

All these potential impacts may be related to either the physical aspects of ensuring community cohesion and inclusion, or access to employment by the provision of business premises, or provision of appropriate housing.

5. Assessment of relevant data, policy and research

5.1 This section will explore sources of available evidence to help identify whether the initial findings, are robust and can be justified. Relevant research and data information will be used to inform the outcome of this equalities analysis assessment as well as to develop mitigating actions for adverse impacts. Appendix 2 sets out sources for the demographic data for the borough as a whole.

5.2 Provision of a Network of Accessible Community Facilities

This material is taken from 'Provision of goods, facilities and services to trans people' published by the Equality and Human Rights Commission. Research conducted for the Equalities Review in 2007 (see 'Provision of goods, facilities and services to trans people') identified areas where trans people were most likely to experience discrimination. This document is of relevance to the protected characteristics of gender reassignment. Access to leisure services featured significantly. Issues include the need for privacy and appropriate changing facilities, courteous treatment, and the existence of an equality policy which ensures fair treatment and outlines the action that can be taken in the event of unfair treatment. This is not highly relevant to the Core Strategy which is not directly concerned with the policies that apply within these buildings. However the provision of a network of facilities will benefit all equalities groups. Similar comments apply to the protected characteristics of the Pregnancy and maternity group with respect to the acceptance of the need to breast feed babies.

5.3 Provision of New Employment Opportunities and Protection of Buildings in which existing jobs are located

As stated above the impact on the protected characteristics of the equalities groups is low as the Core Strategy cannot influence employment practice. However the protection of and provision of business, commercial and retail floorspace will have a positive impact generally.

5.4 Accessibility to Safe and Convenient Public Transport

The research in relation to Trans people discussed in para 5.2 above found that many trans people may experience anti-social behaviour or hate crime. 46% of trans people had experienced harassment in their neighbourhoods and 73% had experienced some form of harassment in public. Safe and accessible public transport is therefore a high priority for this group.

People in the pregnancy and maternity group are also likely to rely on public transport. Car ownership in many of the deprived areas of the borough is low with 42.8% of households not owning a car (Census 2001). This ranges from over half in the north of the borough in New Cross(55.8%) to under a third (32.8%) in the south in Grove Park.

In relation to Marriage and Civil partnerships this issue is of marginal relevance as the protected characteristics of this group relate to employment policy.

5.5 Design and Accessibility and Safety of the Public Realm

The research in relation to trans people discussed above highlights their vulnerability to abuse and harassment where they live. The research found that 46% of trans people had experienced family breakdown due to their gender identity and 28% had moved to a different area because of their gender reassignment. Secure housing design and an accessible and safe public realm will help to support this group and increase feelings and perceptions of security.

People in the pregnancy and maternity group will also rely on an accessible and safe public realm due to the physical necessity of transporting small children.

In relation to Marriage and Civil partnerships this issue is of marginal relevance as the protected characteristics of this group relate to employment policy.

5.6 Provision of housing that can accommodate the needs of a family with young children

ONS data 2010 shows that Lewisham has a slightly higher birth rate than London, at 76.8 live births per 1,000 women aged 15-44, as opposed to 72.1 live births per 1,000 women aged 15-44 in London as a whole.

The Lewisham Strategic Housing Market Assessment 2008 shows that housing provision has a high impact on pregnancy and maternity equalities group. Deptford, Lewisham Town Centre and Bellingham are the areas of the borough most likely to contain unsuitable housed households (Lewisham Housing Survey 2007, Strategic Housing Market Assessment 2008). The assessment showed a clear need for smaller market dwellings, but a surplus of market dwellings with three bedrooms or more. There is also a high requirement for smaller social rented dwellings and for social rented dwellings with four or more bedrooms.

The Core Strategy is required to be in conformity with the policies in the London Plan and has policies to provide 'Lifetime' Homes which are intended to be adaptable to changing needs over a lifetime of occupancy, and a requirement for 10% of all new housing to be wheelchair accessible or easily accessible for those using a wheelchair. This means that new homes will be capable of accommodating prams and buggies.

6. Update of the Core Strategy Equalities Impact Assessment Action Plan (2009)

6.1 Amount of New Employment Proposed in Mixed Use Employment Locations and Loss of Employment due to redevelopment

The Core Strategy sets the context for the Site Allocations DPD and allocates the main development sites (Strategic Site Allocations (SSA)) in the borough that are intended to ensure the regeneration of the north of the borough.

The Action Plan stated that research should be undertaken into the structure of employment on the industrial sites that are proposed to be redeveloped for mixed use business with residential and would thereby lose the more traditional forms of industrial and warehousing employment.

The lead in time for development is over a period of years so it was considered that the nature of employment on the sites would change over time and be out of date by the time the schemes came to fruition.

A number of the schemes have received planning permission as below. However only one scheme is currently on site which is Marine Wharf West which forms part of the Plough Way SSA, and it has not yet been completed.

- Marine Wharf West: This is on the site of the former Jet Stationery Factory which was demolished. When it was last operational in 2007, 133 staff were employed. This would have been in a variety of industrial, warehousing and transport roles. The redevelopment proposal (is projected by the developer to double the number of jobs provided on site to between 264 – 270 in smaller more flexible accommodation. The proposal intends to ensure that business on the site will complement existing employment provision and serve the needs of local people. Business Support and training is proposed and terms attractive to new and small/medium sized businesses. The numbers of jobs provided and the more varied nature of the premises in a range of uses in retail, office, and light industrial will increase the range of jobs locally and

complement the industrial and warehousing uses in the areas along Surrey Canal Road and across the border in LB Southwark.

- The proposals for the Cannon Wharf section of the Plough Way SSA are proposed to replace 230 jobs with 400 jobs. It is proposed to replace the Cannon Wharf Business Centre providing office space, some commercial units with a street frontage of retail units, cafes and restaurants, office and leisure space with a nursery. The jobs that will be lost are in the low density parts of the site in timber yards, small road haulage firms, and small importers. This scheme is not yet on site.
- Surrey Canal Triangle SSA: This is an area of industrial and warehousing estates surrounding the Millwall Stadium. Jobs in the area include car repairs, warehousing, printers, timber yard and joinery depot and other forms of industrial and warehousing jobs. In December 2010 the developer assessed that there were 183 jobs on site. The redevelopment scheme was projected to potentially deliver between 933 and 1946 on site jobs discounting those relating to construction and development of the scheme. The jobs would be provided in a mixture of retail shops, cafés and restaurants, hot food take-aways, business uses (offices), community assembly and leisure uses and a hotel. There would also be a number of premises maintenance jobs. A relocation scheme for displaced businesses was proposed, and is being required by the Mayor of London as a condition of grant of permission.
- Oxestalls Road SSA: This area was assessed by the developer at the beginning of 2010 as providing 162 jobs in such uses as a Car breaker, a self storage facilities, a scrap yard, petrol filling station, off licence and car wash and a car auction facility. Most jobs were provided in a refuse vehicles depot (75) and at a Taxi Cab Repair Company (45). The redevelopment would potentially provide in the region of 740 jobs in a mix of industrial, retail, restaurant, office and leisure uses. It is understood that the taxi cab repair company would be able to continue to operate on site. The scheme has not yet progressed as the developer does not own all of the site.
- Convoys Wharf SSA: Convoys Wharf is a very significant large site on the banks of the Thames at over 16 hectares which is currently a vacant wharf. The wharf uses on site are protected by Directions of the Mayor of London which prevent about half of the site from being used for other purposes. This may be reviewed by the Mayor and the Secretary of State in the future. However the site has not been used as a wharf since 2000. Most of the buildings on site, which until recently were used for low intensity storage purposes have now been demolished and the site is entirely vacant. Even when operating as a wharf the site provided few jobs. The new development should it finally go through it's final stages of approval including referral to the Mayor Of London, has the potential to provide a much more varied and substantial job offer.

The commitment of many of the schemes to relocated business on site, and to providing a mix of uses which will generate a variety of jobs including entry level jobs for younger people is considered to mitigate the adverse impact of the loss of some jobs which would have been traditionally available. This is of relevance to the protected characteristics age groups, gender reassignment, marriage and civil partnerships, disabilities, race and gender.

6.2 Adverse Impact on Faith Groups due to protection of Employment Premises

This impact was identified due to the shortage of economical premises for faith groups to occupy and their consequent unauthorised use of warehousing/industrial

units for this purpose. Ways of mitigating this impact within the remit of the Core Strategy were considered. It was thought that the designation of Mixed Use Employment Locations which would replace some industrial sites would potentially allow the provision of premises which could be used by faith groups. A large multi faith centre will be provided as part of the development of the Surrey Canal Triangle SSA and will be able to accommodate large congregations and be available to all religious groups. Other ways of mitigating this impact were outside of the influence of the Core Strategy, such as, for example, the multiple use of community buildings such as schools by using them after school hours.

6.3. Pressure on Public facilities by intensity of development

The Core Strategy EIA identified the concerns of community groups and local residents that the choice of a borough wide regeneration strategy would place undue stress on community facilities and public transport. The Assessment considered that this would potentially produce an adverse impact on equalities groups particularly in the Deptford New Cross Area where most of the new development would be located, and where general levels of deprivation are such that these impacts would particularly affect vulnerable people.

6.3.1 Planning Obligations Supplementary Planning Document

The action plan proposed that a Planning Obligations Supplementary Planning Document (SPD) should be produced in order to ensure that the identified requirements of the equalities groups outlined in the report would be met. Planning obligations, or Section 106 agreements, are legal agreements between local planning authorities and developers, or unilateral undertakings made by developers, in the context of the grant of planning permission. Planning obligations are intended to provide funding for a range of community improvements that may be needed as a consequence of development.

Planning obligations can be used to prescribe the nature of development (e.g. by requiring that a given portion of housing is affordable); or to secure a contribution from a developer to compensate for loss or damage (e.g. enhancements to open space); or to mitigate a development's impact (e.g. through increased or improved public transport provision).

The SPD, including the amendments made in response to consultation was adopted by the Council on 24 January 2011.

6.3.2 Community Infrastructure Levy (CIL)

In addition to the Planning Obligations SPD Lewisham Council is currently preparing proposals for a Community Infrastructure Levy (CIL). This is a new way in which local authorities can charge against most types of new development in their area. The money raised will be used to pay for local and sub-regional strategic infrastructure to support the new developments and population, such as schools, hospitals, roads and transport schemes as well as parks and leisure centres. The proposal is currently at a first draft stage and will be available for public comment during March/April 2012. Ultimately the Council hopes to have the CIL adopted and running by mid to late 2013.

6.3.3 Infrastructure Delivery Plan (IDP)

The Council has also produced an Infrastructure Delivery Plan to aid the process of delivery of appropriate infrastructure to support existing and new residents of Lewisham. It represents the Council's current understanding on infrastructure issues and has been prepared in consultation with those responsible for delivering infrastructure throughout the borough. This includes:

- physical infrastructure such as transport, utilities, waste management and flood defence
- social infrastructure such as education, health, leisure, estate renewal and emergency services
- green infrastructure such as parks, allotments, cemeteries and church yards.

The IDP is accompanied by a schedule in order to identify infrastructure needs and costs (including where possible phasing of development), funding sources and responsibilities for development.

6.3.4 Core Strategy Briefing

The Core Strategy EIA also noted that it would be positive to produce a programme of briefings for staff across the Council on the Core Strategy. This was provided in a different form by a series of organised visits to which all council staff were invited to tour the major regeneration sites.

7. New Issues Arising from the Site Allocations Development Plan Document

7.1 The EIA for the Core Strategy Further Options Report 2009 noted that the aim of the option for selecting sites for Gypsies and travellers presented for consultation was to use a criteria based approach to identifying an appropriate site in line with locally assessed need. This criteria based policy was included in the adopted Core Strategy. However it has not been possible to include an allocation for a Gypsy and Traveller Site in the Site Allocations DPD using the Core Strategy Policy. Despite extensive efforts on the part of the Council no suitable site has as yet been found that meets the criteria of the policy. A site in Church Grove Ladywell which had previously been granted planning permission for five pitches was subsequently found to be no longer suitable due to access issues in connection with an increase in the legal size of touring caravans and lorries. The Council will shortly be conducting another site search for a suitable site. However this search will not result in the selection of a site in time for the formal consultation and adoption process of the Site Allocation DPD.

7.2 The most recent research about the Gypsy and Traveller community in Lewisham was compiled by the survey company 'Local Dialogue' as part of the borough's Gypsy and Traveller future needs assessment (2011). The survey found that it was difficult to accurately determine the number of Gypsy and Traveller families in the borough. It estimated that 70 per cent of these are thought to be of Irish Traveller origin, with the remaining 30 per cent consisting of Roma Gypsies, English Gypsies and New Age Travellers. The 01/2006 government circular stated that 'Gypsies and Travellers are believed to experience the worst health and education status of any disadvantaged group in England (and that) research has consistently confirmed the link between the lack of good quality sites for gypsies and travellers and poor health and education.' All respondents to the Local Dialogue survey thought that Lewisham Council should provide sites, with some specifying the need for them to be in safe places, near schools and other amenities as well as being able to accommodate additional/disabled needs. These comments are similar to the assessment criteria for Gypsy and Traveller sites in Core Strategy Policy 2 which were in turn based on the governments Planning Circular 01/06 Planning for Gypsy and Traveller Caravan Sites.

7.3 The Church Grove Site was proposed as a site for Gypsies and Travellers in the consultation exercise on options for the Site Allocations DPD in 2010. No comments

were received on the appropriateness of this site for this use as part of this specific consultation exercise, beyond an acknowledgement by the Greater London Authority that the site had been proposed to be allocated.

7.4 The process of site selection for a Gypsy and Traveller site can continue outside of the Site Allocation DPD preparation process. The DPD is not necessarily a comprehensive document and merely lists the sites that the Council considers are potentially available for development. This does not rule out that other sites could become available for development during the lifetime of the document. The omission of a site for Gypsies and Travellers within the Site Allocations DPD could be considered to have an adverse impact on these equalities groups in the short term. This temporary adverse impact will be mitigated by the new site search being undertaken by the Council and the eventual provision of an allocated site.

8. Consultation

8.1 Consultation on the Core Strategy

The Core Strategy has now been adopted by the Council. This section looks retrospectively at the consultation that was undertaken from the perspective of equalities groups in particular the three groups that were not dealt with in the previous Core Strategy Equalities Impact Assessment. Full details of the various stages of consultation undertaken, spanning five years between 2005 - 2010 can be found in the Core Strategy Consultation Statement on <http://www.lewisham.gov.uk/myservices/planning/policy/Documents/CoreStrategyPublicationConsultationStatementFebruary2010.pdf>

8.1.1 Responses

A theme running through the consultation undertaken was the need for provision of a network of community facilities in order to support the proposed regeneration of the borough. Concern was expressed by a number of community groups that the proposed provision of new housing mostly in the Deptford New Cross Area would put an undue strain on existing infrastructure in terms of:

- provision of a network of accessible community facilities
- provision of new employment opportunities and protection of buildings in which existing jobs are located.
- accessibility to safe and convenient public transport.
- design, accessibility and safety of the public realm
- An appropriate mix of housing needed to be provided

All these issues impact on equalities groups.

8.2. Consultation On the Site Allocations Further Options Report 2007

The Consultation process for this report is outlined in a separate Consultation Statement dated March 2012 to be found on the Council's website at <http://www.lewisham.gov.uk/myservices/planning/policy/LDF/site-allocations/Pages/further-options.aspx>. The detailed consultation comments are also available on this link.

8.3 Responses

As a result of this largely site based nature of the documents comments are largely concerned with the physical nature of the site, infrastructure concerns, comments about the accuracy of the information in the Site Allocations DPD, and objections to proposed uses. .

9. Findings and Results

9.1 Following initial data analysis assessment and identification of potential areas for discrimination, use of data and research and previous consultation exercises, the assessment checked whether, in any of the areas identified:-

- there is unlawful discrimination
- there is an adverse impact on one or more equality categories
- there is a failure to promote equality of access or opportunity
- some equality categories are, or may, be excluded from benefits
- some equality categories are disadvantaged.

9.2 Taking into account the issues raised in the current assessment and building on the work carried out for the 2009 Equalities Impact assessment for the Core Strategy, no major change is considered necessary to the documents or to the Action Plan set out in the previous Assessment.

The negative impacts caused by the loss of traditional industrial uses for marriage and civic partnership groups on some major sites in the borough will be mitigated by the introduction of new and more varied forms of employment on these sites and by schemes to help the relocation of existing businesses.

The fact that it has not been possible to allocate a site for Gypsies and Travellers in the Site Allocations document reflects a delay in the provision of a site that is outside the control of this document. This negative impact will be remedied by the search for a site which will be ongoing, and is not dependent on its inclusion in this document.

10. Proposed Actions

10.1 As stated in the Equalities Impact Assessment for the Core Strategy much of the positive effects of the policies in the document will depend on implementation and schemes coming forward from developers that meet the policy requirements and equalities aims set out. The Council will continue to monitor the impact of the policies on Equalities groups and opportunities for this will occur with the preparation of further documents in the Lewisham Local Development Framework – in particular the Development Management DPD and the Town Centre Area Action Plans for Lewisham and Catford Town Centres which will deal with some more detailed implementation issues.

The impact of the Community Infrastructure Levy and the contribution this money will make towards providing facilities of benefit to community groups, together with planning obligations will also continue to be closely monitored by the Planning Service.

Reference: Provision of goods, facilities and services to trans people: Equality and Human Rights Commission

http://www.equalityhumanrights.com/uploaded_files/EqualityAct/psd_trans_guidance.pdf

Appendix 1

Available from the EHRC site online at: <http://www.equalityhumanrights.com/advice-and-guidance/new-equality-act-guidance/protected-characteristics-definitions/>

The following characteristics are protected characteristics

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

Age

Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Gender reassignment

The process of transitioning from one gender to another.

Marriage and civil partnership

Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race

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

Religion and belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Sex

A man or a woman.

Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes

More in-depth definitions of these protected characteristics are available on the Office of Public Sector Information website.

Appendix 2:

All Census data on Lewisham may be found on the following link

http://instantatlas.lewisham.gov.uk/InstantAtlas_Live/dataviews/. A document giving information as to how to access and use this information is here :

http://instantatlas.lewisham.gov.uk/InstantAtlas_Live/news/item?itemId=4

Some relevant extracts are given below.

Employment and Unemployment Rates by Gender

Date June 2011 Source ONS

	Lewisham	London
Employment Rate Males	76.8%	75.4%
Unemployment Rate Males	9.8%	9.1%
Economic Activity Rate Males	84.6%	83%
Economic Inactivity Rate Males	13.6%	17%
Employment Rate Females	58.1%	60.6%
Unemployment Rate Females	11.2%	9.35
Economic Activity Rate Females	65.4%	66.8%
Economic Inactivity Rate Females	34.6%	33.2%

Number of Live Births per 1,000 women aged 15-44 Date 2010 Source JNS

Lewisham	65.5
London	72.1

Under 18 Conceptions per 1,000 women aged 15-17 Date 2009 Source ONS

Lewisham	55.6
London (Average for all boroughs)	39.6

Appendix 3:

CORE STRATEGY EQUALITIES IMPACT ASSESSMENT 2009