

## Equalities Analysis in Lambeth

### Proposal Title \*

Lambeth Local Plan Review – Draft Revised Lambeth Local Plan Proposed  
Submission Version 2020

### Author

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Please provide name of lead author and/or those within project team who may be required to contribute to this assessment

### Who will sign off the assessment?

Rob Bristow

Please indicate who will be involved in approving this assessment. This will need to be signed off by the designated Head of Service or Director

### Q1a. What is changing?

The Lambeth Local Plan is part of the statutory development plan for Lambeth, alongside the Mayor of London's London Plan. Neighbourhood development plans, when made, also become part of the statutory development plan. Together these documents set the policy context for growth and development in the borough and provide the basis for determining planning applications. If the Council is to drive sustainable growth, manage its consequences and secure benefits for residents, it is essential to have an up-to-date Local Plan. Without this, the Council's ability to guide and shape investment and development will be significantly diminished. An up-to-date Local Plan will also make a vital contribution to delivering the Council's Borough Plan outcomes, achieving the recommendations of the Lambeth Equalities Commission and addressing the climate emergency declared by the Council in January 2019.

The current Lambeth Local Plan was adopted by the Council in September 2015, following a statutory process of preparation and examination. In October 2017, Cabinet agreed to a partial review of the Lambeth Local Plan to address changes to national planning policy, the emerging new London Plan and new evidence. Cabinet agreed a first round of public consultation on issues for the partial review, which took place over eight weeks between October and December 2017. In October 2018, Cabinet agreed a second round of public consultation on a full Draft Revised Lambeth Local Plan and Proposed Changes to the Policies Map, to take place over eight weeks between October and December 2018.

The Draft Revised Lambeth Local Plan October 2018 (DRLLP 2018) was published alongside supporting evidence and a Sustainability Appraisal, which included assessment of the emerging policies against 19 environmental, economic and social objectives, including an objective on equalities. The equalities objective is set out below and can also be found in the Sustainability Appraisal report as well as its non-technical summary.

In January 2020 agreement from Cabinet and Council will be sought for the next two stages in the statutory process of the Local Plan review: pre-submission publication of the Draft Revised Lambeth Local Plan Proposed Submission Version (DRLLP PSV) and Proposed Changes to the Policies Map, followed by submission to government for independent examination.

An examination hearing is anticipated in summer 2020, followed by receipt of the Inspector's report later in 2020 and adoption in early 2021.

The Local Plan is evidence based and has been informed by local data and studies on housing, business and jobs, town centre uses and hotels, transport, environment (including air quality and waste) quality of built environment and places and neighbourhoods area based studies. Drawing on the evidence base and the many issues raised through public consultations since 2011, six spatial planning issues affecting Lambeth have been identified: accommodating population growth; achieving economic prosperity and opportunity for all; tackling and adapting to climate change; providing essential infrastructure; promoting community cohesion and safe, liveable, inclusive neighbourhoods; and creating and maintaining attractive, distinctive places. The Local Plan sets a vision for the spatial development of the borough over the next 15 years, supported by six strategic objectives. Borough-wide policies are set out in seven chapters of the Plan covering delivery of the vision and objectives; housing; economic development, retail and town centre uses; social infrastructure; transport and communications; environment and green infrastructure; and quality of the built environment. Section 11 of the Plan includes place-specific policies for each part of the borough (eleven in total).

Chapters of the Local Plan that have been reviewed include housing, economic development, social infrastructure, transport and communication, environment and green infrastructure, quality of the built environment and places and neighbourhoods. A summary of the key changes to the policies since the October 2018 consultation draft is set out in Appendix 3 of the Cabinet Report 13 January 2020.

What is the most significant or key change taking place? Can you indicate the type of change in your response (e.g. policy/decision/strategy/ service/procedural/ geographic/procurement etc.) so it is clear what is being equalities assessed? Why is this change happening? What do you aim to achieve? Can you clearly indicate what decision-makers are being asked to take a decision on?

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Q1b. Who will be involved in approving this decision?

The decision will be made by Cabinet and Council.

Who else will be involved in signing-off this decision?

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Q2a. What do we know about the people who will be impacted by this change?

Key stakeholders for the Local Plan Review are:

- Those who live, work and carry out business in Lambeth
- Tenants and leaseholders
- Residents' associations
- Community and voluntary groups
- Elected politicians
- Neighbourhood planning groups (existing and emerging)
- Business Improvement Districts and business networks
- Developers and landowners (and their representatives)
- Registered providers of affordable housing
- Infrastructure providers (such as transport and health services)
- Statutory consultees such as the Mayor of London, other London boroughs, Historic England, Environment Agency and Natural England.

Ultimately all Lambeth residents and businesses have potential to be affected by the policies in the Local Plan.

An EqlA was previously undertaken on the consultation and engagement plan for the Issues consultation, which took place in October-December 2017 (see attachment). More information on this, including analysis of respondents, can be found in the EqlA report on the DRLLP 2018, that was attached to the 15 October 2018 Cabinet Report as Appendix 6.

The second round of public consultation on the Draft Revised Lambeth Local Plan and Proposed Changes to the Policies Map took place between October and December 2018. The consultation resulted in 330 representations from a wide range of stakeholders, covering some 2,400 different points.

The breakdown of respondents by type is as follows:

Type of respondent	Number	Percentage
Individual	192	58
Tenants'/residents' association	6	2
Community group	11	3
Faith group	3	1
Neighbourhood Planning Forum	3	1
Elected politician	10	3
Representative body	11	3
Business	8	2
Business improvement district	5	2
Developer/landowner	53	16
Affordable housing provider	5	2
Infrastructure provider	11	3
Other London borough	6	2
Other statutory consultee (including the GLA)	6	2
<b>Total</b>	<b>330</b>	<b>100</b>

More detailed demographic information was asked of respondents who used the online survey to respond to the consultation:

#### Age

Question asked - Which age group applies to you?

82 (84.5%) of the 97 who submitted a survey answered this question.

Age Range	Count	Percentage
18-24	5	6.10%
25-34	18	21.95%
35-44	12	14.63%
45-54	17	20.73%
55-64	17	20.73%
65-74	10	12.20%
75-84	3	3.66%
<b>Grand Total</b>	<b>82</b>	<b>100%</b>

#### Disability

Question asked - Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? Please include problems related to old age.

79 (81.4%) of the 97 who submitted a survey answered this question.

Disability	Count	Percentage
No	70	88.61%
Yes, limited a little	7	8.86%
Yes, limited a lot	2	2.53%
<b>Grand Total</b>	<b>79</b>	<b>100%</b>

#### Sex

Question asked - At birth were you described as:

80 (82.5%) of the 97 who submitted a survey answered this question.

Sex	Count	Percentage
Female	37	46.25%
I prefer not to say	4	5.00%
Male	39	48.75%
<b>Grand Total</b>	<b>80</b>	<b>100%</b>

#### Ethnicity

Question asked - What is your ethnic group?

73 (75.2%) of the 97 who submitted a survey answered this question.

Ethnicity	Count	Percentage
Arab	1	1.37%
Asian / Asian British Chinese	2	2.74%

<b>Ethnicity</b>	<b>Count</b>	<b>Percentage</b>
Asian / Asian British Indian	1	1.37%
Asian / Asian British Pakistani	1	1.37%
Black African	3	4.11%
Black Caribbean	5	6.85%
Latin American/ Latin	1	1.37%
Mixed White and Black Caribbean	1	1.37%
Other	8	10.96%
White Irish	1	1.37%
White Polish	1	1.37%
White English / Welsh / Scottish / Northern Irish / British	48	65.75%
<b>Grand Total</b>	<b>73</b>	<b>100%</b>

A number of comments addressed the strategic approach but many were detailed points about aspects of policy wording or supporting text. The issues attracting the most comment were affordable housing, affordable workspace, hotels and tall buildings. The place-specific policies with most comments were Waterloo and West Norwood. A number of comments were made in relation to specific sites.

Full analysis of the comments made is set out in the Draft Revised Lambeth Local Plan October 2018 Consultation Report. That report includes a full schedule of every comment made, officer consideration of the comment and whether or not it resulted in a change to the wording of the Draft Revised Lambeth Local Plan for inclusion in the Proposed Submission Version.

The Sustainability Appraisal of the DRLLP PSV 2020 will be published for consideration alongside the draft plan document. It will include a 'non-technical summary' to make its content more accessible to readers. It will also form one of the statutory 'submission documents' that will undergo examination alongside the draft plan.

What does your information tell you about the people who will be affected by this change? Are protected groups impacted? What information do you hold on the protected characteristics of the people affected by the change? (Age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion or belief, gender, sexual orientation, health, socio-economic, language) Are there any gaps or missing information?

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## Q2b. How will they be impacted by the change?

Detailed analysis of the equalities impacts of the policies within the DRLLP PSV has been undertaken as part of the statutory Sustainability Appraisal for the plan. This Equalities Impact Assessment summarises the findings of that analysis and cross-refers to the more detailed analysis within that document.

The council is required to prepare a Sustainability Appraisal (SA) for all development plan documents (section 39 Planning and Compulsory Purchase Act 2004). A SA has been prepared on the DRLLP PSV 2020 and previous iterations of the draft plan. A SA is a systematic and iterative process undertaken during the preparation phases of a plan or strategy. The process tests the overall plan, including each emerging policy against the sustainability objectives that have been agreed for this purpose. The purpose of the SA is to inform the decision making process, by highlighting the potential implications of pursuing a particular strategy or policy response. The SA on the DRLLP 2018 made 98 recommendations and all of these have been considered in the preparation of the DRLLP PSV 2020. The schedule of SA recommendations made at that time, along with the planning policy response to each recommendation is set out as an appendix to the SA on the DRLLP PSV 2020.

Accordingly, the proposed final version of the Local Plan has been further altered from the DRLLP October 2018 version to maximise benefits, and minimise adverse effects as identified through the entire SA process (both on the DRLLP 2018 and on the DRLLP PSV 2020) as well as in response to consultation comments and the inspectors report on the draft London Plan.

The DRLLP PSV 2020 works alongside the Mayor's London Plan as the Borough's Development Plan (together with any neighbourhood plans made). For some policy areas, the council will apply and rely on London Plan policy, for example air quality. For others it adds a local dimension to the London-wide approach. The emerging new London Plan policies have already been subject to equalities impact assessment; this was incorporated into the Integrated Impact Assessment (IIA) for that document. Other assessments forming the IIA were Strategic Environment Assessment, Health Impact Assessment, and Community Safety Impact Assessment. For more detail on this please see the [London Plan Integrated Impact Assessment](#) and its [Supplementary Equalities Impact Assessment Information](#). The Draft London Plan and supporting documents, including the IIA, underwent examination by a panel of planning inspectors appointed by the Secretary of State for Housing, Communities and Local Government during 2019.

The SA on the DRLLP PSV 2020 assesses, among other things, how protected equality groups are likely to be impacted by the policies contained in the draft Plan. The DRLLP PSV has been assessed against 19 sustainability objectives. While there is a specific objective on equality and diversity (SA Objective 5) it is considered that a number of other objectives seek to improve outcomes for various protected equality groups. For example there are SA objectives on health and well-being, access and services, addressing crime and fear of crime, housing, liveability and social cohesion, transport, education and skills, local economy and tackling worklessness – all of which apply to, and seek to benefit, different protected equality groups.

*SA Objective 5 states: To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty, and social exclusion. To achieve this objective, plan policies should promote a culture of equity, fairness and respect for people and the environment; improve environmental conditions for Lambeth's deprived areas and deprived communities; reduce poverty and social exclusion; remove or minimise disadvantage suffered by persons who experience disadvantage or discrimination; promote social cohesion within and between population groups; enable social integration between minority groups and wider society; address housing, cultural, social and employment needs of those with protected characteristics; and promote adequate accessibility, in particular for older and disabled people.*

As a further level of scrutiny and in addition to the policy prompt questions set out for SA Objective 5 in the Sustainability Framework, the SA analysis also used a series of indicators in relation to inequalities and social exclusion to help assess the impact of policies. These indicators have been derived from research undertaken by the Town and Country Planning Association and Trust for London in their publication 'London Planning for a Just Society? Exploring How Local Planning Authorities Are Embedding Equality and Inclusion in Planning Policy' October 2019. Recommendations to help advance equality and help foster good relations have been made in the SA where appropriate.

During the process of undertaking the SA on the DRLLP SPV 2020, recommendations have been made, where appropriate, to maximise positive effects and minimise potential negative effects on equality groups as well as the wider environment in general. Overall, the SA analysis demonstrates generally positive impacts on the different protected groups in Lambeth. Table 1 below draws out some summary analysis on equality groups from the SA work on some chapters of the DRLLP PSV. For more detail, including baseline data on protected characteristics, and to review the whole SA analysis across all 19 sustainability objectives, please refer to Sustainability Appraisal on the DRLLP PSV 2020 (which is being published for submission alongside the DRLLP PSV 2020).

**Table 1: Summary of SA Objective 5 equalities analysis of Local Plan chapters on equality groups.**

Local Plan chapter	SA analysis
	<p>Overall it is considered the housing policies should result in positive effects on SA Objective 5. By increasing the supply and range of housing, including affordable housing of mixed tenures and size, and including accommodation for people with care and support needs; local plan housing provision will likely work towards benefitting all protected equalities groups, as well as those on low income levels, those with mental ill health and multiple long term health conditions and particularly those requiring specialist housing through providing greater housing choice, tenures and availability. An increase in the availability and diversity of housing contributes to a reduction in overcrowding, which often occurs in less advantaged communities, particularly BAME communities, and where renting dominates housing ownership, as it does in Lambeth. All housing policies contribute towards delivery of more and improved quality (warmer, safer and healthier) housing and more genuinely affordable housing in the borough, which will help all protected equalities groups as well as those on low incomes and those with mental health and long-term health conditions. Policies seek to improve conditions for the disproportionate number of people, often BAME, older people and lower income people living in Lambeth's older housing stock. It is considered that policy H2 on affordable housing seeks to secure the Mayor's threshold levels of affordable housing from new development and provides for a range of different income levels, from low cost rented housing (social rent/London affordable rent) and intermediate provision. 70% of new affordable housing should be low cost rented homes allocated to need in line with the council's allocation scheme and for Londoners on low incomes (social rent/London affordable rent). This will benefit the lowest income groups of the borough. 30% should be intermediate products including London Living Rent and London Shared Ownership. Over time, this should result in increased availability of more genuinely affordable housing for existing Lambeth residents. Net numbers of existing housing is safeguarded. Exceptionally loss of residential accommodation may be acceptable where the proposal is for specialist non-self-contained accommodation to meet an identified local need (local plan policy H8). This provides opportunity to benefit more vulnerable groups in Lambeth, including age and disability protected groups. To ensure mixed and balanced communities, a range of dwelling types, sizes and tenure is required and the</p>

## Housing

DRLLP PSV 2020 provides for this. Communal amenity and children's play areas should be accessible to all residents of the development, irrespective of tenure. New housing must conform to London Plan policy D5 (accessible housing) and building control standards (this includes 'wheelchair users dwellings' and 'accessible and adaptable dwellings'), and policy H5, together with EN4, will help to address accessibility (both internal and external space), overcrowding and the risk of ill-health from damp or mould thereby helping protected groups such as age, race, disability as well as lower socio-economic status and those with health conditions. Policy H8 makes provision of housing to meet specific community needs, and therefore works to benefit the more vulnerable groups of society (for example older persons, those with significant mental or physical health limitations). Policy sets out that such housing needs to be suitable for the intended occupiers, relevant to client needs including inclusive design, and accessible to public transport services and social networks. Design needs to address the needs of people with dementia and other long-term health conditions. This all helps to advance equality.

Children's play areas will be required in new developments expected to have ten or more children and should normally be made on-site and policy H5 also ensures all dwellings regardless of tenure have access to external amenity space. Such space should be designed to be inclusive for all users, and be accessible to all residents of the development, irrespective of tenure.

Policy H8 supports the provision of housing to meet specific community needs, across a range of tenures. Housing to meet specific community needs in Lambeth can include temporary accommodation for homeless households, sheltered housing with care support, reablement accommodation (intensive short-term), accommodation for victims of domestic abuse and/or violence, staffed hostels, residential-care and nursing-care homes, extra-care housing, and supported housing provision for children, people with physical and learning disabilities or those with mental health issues who require additional support, older persons and other client groups. These forms of specialist housing often provide essential accommodation for the most disadvantaged and vulnerable residents. Loss of this type of housing in the borough will be resisted. Proposals for new housing to meet this need will need to demonstrate how the design will address the needs of people with dementia and other long-term health conditions.

Policy H9 makes provision for new hostels and Houses in Multiple Occupation, and policy H10 sets out a commitment to safeguard the existing site for gypsy and traveller needs and meet the identified future need. It is also considered that the housing policies effectively support the Lambeth Borough Plan 2016 – 2021 three priorities: creating inclusive growth, reducing inequality, and building strong and sustainable neighbourhoods.

One of the biggest influences on people's health is employment. The DRLLP PSV has a number of policies which either directly or indirectly seek to improve the economy of the borough, get residents working and thereby create conditions that improve health and reduce health inequality. Economic policies seek to protect and maintain sites and premises in business use and provide affordable workspace, thereby maintaining and/or increasing employment opportunities in the borough to help create inclusive growth by distributing the benefits of new development to Lambeth residents. Provision for affordable workspace and flexible workspace suitable for micro, small and medium enterprises increases availability of workspace for specific social, cultural or economic purposes. This will help benefit start-ups, creative businesses and not-for-profit and/or charitable organisations supporting Lambeth's creative and digital industries (CDI) economy and providing significant social value. There is a shortage of lower-cost B class space or workspace for small businesses across Lambeth, particularly for businesses in the creative sectors. Provision of affordable workspace is particularly important in opening up start-up opportunities to, for example, lower-income communities, women, language and BAME groups.

Implementation of the policy and approach to planning obligations that will secure the affordable workspace will be set out in the council's Affordable Workspace SPD (due to go to Cabinet in February 2020). The forthcoming SPD will itself be subject to the EqIA process. The SPD will contain information on the selection criteria for approved affordable workspace providers. Such criteria will likely include their capability in activity that promotes the workspace tenant opportunities, services and events to residents local to their workspace – particularly for those in priority groups; facilitating corporate social responsibility activities between the voluntary sector and tenants within workspace; creating employment and training opportunities for

residents local to their workspace; and their business conduct, for example their approach to London Living Wage; local employment (where appropriate) and inclusive recruitment. The selection of approved affordable workspace providers will also be subject to EqIA when the decision report is written. Policy ED7 Town centres, also seeks to safeguard local shops, and other local services to meet community needs, and it is considered that this will help support different cultural retail sectors. Through this, the policy will assist those who are less mobile, such as older people and people with disabilities, and those on low incomes by having these services accessible and local thereby reducing the need to travel, or at least the need to travel far. Encouraging new residential development on appropriate sites in town centres and residential use above ground level also reduces the need to travel, increases accessibility to fresh, local and cultural food, and promotes social cohesion and therefore works to benefit equality groups (e.g. age, disability, and race) and lower socio-economic groups provided these are available on affordable terms. Major redevelopment proposals in town centres will also need to re-provide small shop premises on affordable terms, which will contribute to maintaining locally owned businesses and help support social, cultural and ethnic diversity of the area. The policies contribute to increased access to localised employment which will benefit many equalities groups including women and parents in terms of offering a better work and domestic life balance. Policy ED11 will have similar positive impacts on equality groups as it seeks to have day-to-day local retail uses such as newsagents, chemists, grocers and bakers within walking distance of home, thereby providing increased accessibility for low income groups, the elderly, women in pregnancy and maternity stage and people with mobility difficulties.

Lambeth's markets are well established and popular with local communities and visitors. The protection of existing indoor and street markets in the borough (policy ED12) provides continued opportunity for access to affordable, fresh and healthy food; food from a variety of cultures, supports market holders; fosters good relations; and maintains the social value of markets, and will likely result in positive outcomes for various equality groups. It is considered that policy ED15 (employment and skills) should result in significant positive effects on advancing equality and fostering good relations by helping to ensure local jobs go to local people, and that these people have the necessary skills to partake in the employment opportunities offered by major development in the borough. Financial contributions will be sought from major developments to help support those sections of the Lambeth workforce that are furthest from employment, having been out of work for a long period of time and/or having low levels of skills. It will address unemployment and disadvantage in the workplace, help address child poverty and provide opportunities for young people (but not limited to just the young) to get work through apprenticeships. The policy is likely to benefit young people, the unemployed (who may include BAME) and lower income communities in particular, who may have more limited access to education and employment opportunities. It may also help women and caregivers in providing localised employment which can assist in maintaining or improving a better work/life domestic balance.

Policy S1 safeguards existing social infrastructure and policy S2 supports new or improved social infrastructure both of which should impact positively on all equality groups. It is noted that the DRLLP PSV provides protection of all existing social infrastructure, and this will include those social infrastructure that supports groups with protected characteristics.

Proposals for more than 25 residential units should include appropriate provision of social infrastructure to meet the additional need that will arise, where this cannot be met adequately through existing facilities. Policy states new social infrastructure should be made available to all residents irrespective of tenure. Similarly, proposals of 500 residential units should incorporate suitable childcare provision to meet additional need that cannot be met by existing facilities.

Transport policies T1 – T4 promote sustainable travel, including walking, cycling and use of accessible public transport. Policies seek to improve access to public transport, improve walking and cycling routes and reduce dependence on the private car which will benefit poorer residents (including those 50% of residents that do not have access to a private vehicle), those that prioritise their health, and those less able to travel. The policies support improvements to public transport services which will be focused on maximising its use especially by people with disabilities, the elderly, young children and others for whom public transport accessibility is a barrier. Other barriers to public transport use will arise if it is too expensive,

Economic Development,  
Retail and Town Centre  
Uses

Social Infrastructure

Transport

inconvenient, unreliable or is felt to be unsafe so it is important the council lobbies for improvements in this regard as well. Addressing such barriers helps advance equality, eliminate discrimination and foster good relations although it is recognised that some of these barriers are outside the scope of planning policy. In so far as planning policy is able; it is considered the public transport policies seek to undertake what is possible through planning to address applicable barriers. Improvements to public transport infrastructure should have positive impacts on equality groups especially if they link deprived neighbourhoods with areas of employment opportunity. However timely deliverability of such projects can be uncertain. According to the Infrastructure Delivery Plan (IDP), there is no progress or update for new high-level stations at Brixton and/or Loughborough Junction connecting to the London Overground, nor is there progress for access improvements and platform lengthening to Wandsworth Road and Clapham High Street Stations. There is also a significant funding gap (£16M) on refurbishments to provide step-free access and a safer and improved user experience at Brixton Rail Station so effects on equality groups and the wider population of Brixton are less likely to be maximised. Similarly there is a current funding gap on improving step-free access at Tulse Hill Station. The lack of step-free access adversely affects the following protected groups: age (older and younger), disability and pregnancy and maternity. The council will need to continue to lobby TfL, Network Rail and other appropriate bodies for the required funding/ delivery of improvements. The provision of safe and secure walking and cycling routes should have positive impacts on those who are more likely to suffer harassment in the streets, such as LGBTQ+, BAME and faith groups and also those with mental health issues. However, the whole journey experience needs to be accessible, from leaving the house to arriving at the desired destination. All journeys, particularly those made by public transport, involve an element of walking. People with disabilities, and powered mobility scooters and wheelchairs users all use (or should be able to use) footpaths as part of their journeys in a safe and inclusive manner. Policy T1 supporting text requires transport assessments to identify areas requiring improvements to support people with disabilities and reduced mobility. This is considered to have a positive effect on SA Objective 5 and the disability and age protected groups. Clause (e) in policy T2 on walking states that the council is committed to ensuring that the physical environment in Lambeth, including all our streets, is fully accessible to all. Provision for pedestrians should therefore be inclusive and prioritise those with particular mobility needs. This policy approach is commended and should result in more positive effects for those equality groups with accessibility needs, provided such improvements are delivered. It is noted that the IDP identifies funding gaps for some transport projects, for example Healthy Route Network, Low Traffic Neighbourhoods, Loughborough Junction Public Realm which suggests it is uncertain when such projects can be delivered. Until they are, adverse impacts for some protected groups will continue. Overall it is considered that policy T4 appropriately seeks to achieve an accessible public transport network thus providing positive impacts for people with disabilities, elderly, pedestrians with prams and other people with reduced mobility. However, as described above, there are current funding gaps for projects that seek to provide step-free access and generally improve stations, for example Brixton Rail and Tulse Hill stations, which means that until such time as step-free improvements are delivered, there will continue to be adverse impacts on particular equality groups (i.e. disability, age and pregnancy and maternity). Parking for people with disabilities for new residential developments is set out in London Plan policy T6.1. For non-residential developments, Lambeth will apply London Plan policy T6.5 on non-residential disabled persons parking. 'Adequate provision' should be made for disabled parking (at least one bay), dependant on local factors such as the nature of the development, site constraints and existing provision. Supporting text paragraph 8.36 to DRLLP PSV policy T7 states that the availability of step-free access to public transport is a relevant consideration and where appropriate the developer will be expected to facilitate improvements to this. These improvements will help to ensure that those with particular mobility needs are better able to utilise public transport. Clause (f) states that Blue Badge parking should be located closest to town centres and the entrance of facilities which also positively contributes to SA Objective 5 and the disability protected group. The provision of car clubs (aim is for a car club space within 400m of each other) should impact positively on equalities groups, particularly those with no access to a car, those that live in areas of poor public transport accessibility, people with disabilities, older residents, and those on lower incomes / cannot afford to own and run a car. For those groups that require

it, the DRLLP PSV 2020 makes provision of mini-cabs, taxis, private hire and ride hail services which will help address accessibility and safe travel, particularly at night for women, LGBTQ+, pregnancy and maternity and older and younger persons.

Protection of existing open space and green infrastructure and increasing quantity of open space and green infrastructure in the borough helps encourage healthy lifestyles and mental well-being for those equalities groups at greater risk of ill-health (e.g. some children and young people, some older people, some women, some members of ethnic minority communities, those that speak other languages, people with a history of mental illness). Evidence suggests certain population groups are more likely to benefit, for example:

- Children: A greater quantity or proximity of natural spaces around the home or school is significantly related to improved cognitive performance and reduced incidence of behavioural issues. Evidence suggests that use of green space by children is a lifetime determinant of future use.
- Older people: Older people, especially over 75 years old, or those living on their own who are socially isolated, or in a care home are at greater risk of heatstroke. Planting trees and vegetation and the creation of green spaces to enhance evaporation and shading can make the environment cooler and reduce this risk.
- Lower socio-economic groups: The benefits of green space are greatest for people from lower socio-economic groups. Living environments with a greater amount of green spaces are associated with reduced likelihood of depression and anxiety amongst those from this group.
- People in confined circumstances e.g. care homes, hospitals, prisons: Evidence in the literature shows that among other benefits, viewing nature is positive for health in terms of recovering from stress, improving concentration and productivity, and improving psychological state.

Environment and Green Infrastructure

The policy also safeguards cemeteries and burial space in the borough, which will benefit particular faith groups. Policy EN2 enables access to cheaper or even free fruit and vegetables which will benefit lower socio-economic groups, reduce poverty and improve health and social inclusion/sense of community. The incorporation of community gardens, allotments, orchards and innovative spaces for food growing are encouraged in major developments (not limited to residential) and therefore can benefit, for example, faith groups, people with disabilities, young and older persons groups that use buildings or land in D1 or D2 use class. Fuel poverty can be addressed through policies EN3 and EN4, together with applicable London Plan policies, which will help reduce energy bills and benefit lower socio-economic groups, the elderly and other groups struggling to provide a warmer home. In terms of flood risk; the location of housing in relation to health hazards is an important consideration for those who are less able to deal with the impacts of flooding, for example older people, people with disabilities, people with particular mental health needs, and children and young people. A key issue will be assessing the potential vulnerability of occupiers in flood risk areas, including arrangements for safe access and egress. The council will apply London Plan policies for improving air quality and managing heat risk, both of which acknowledge the adverse effects that can be experienced by the more vulnerable members of society, such as the very young, the elderly or those with pre-existing health conditions.

Policy Q1 inclusive environments is considered a key policy for all development under the local plan to achieve SA objective 5, advance equality, foster good relations and is therefore likely to result in significant positive impacts for people with disabilities, older people, other people with mobility constraints, children, LGBTQ+, pregnancy and maternity, faith groups and BAME. It should be noted the Draft London Plan also places a significant emphasis on inclusive environments. Policy Q4 – public art – has potential to foster good relations and result in improved social cohesion/inclusion and reduce feelings of discrimination as it seeks to support, celebrate and reflect Lambeth's diverse communities. Policy Q6 – urban design and public realm also seeks to provide a public realm that is improved for all users, particularly through legibility, permeability and convenient access for all users and offers positive benefits for protected equality groups. Policy Q6 has also been improved since the DRLLP with regards to wheelchair users and those with mobility issues as supporting text now states that greater clear footway distances (more than 2m) may be required in high footfall locations such as at major transport interchanges. This would benefit disability groups as well as pregnancy and maternity.

Quality of the Built Environment

DRLLP PSV policies Q6, Q7 and Q11 have been significantly improved since the DRLLP 2018 with regards to climate change mitigation and adaptation. It is considered these policies help protect certain equality protected groups, for example age, disability and those with certain health conditions as overheated buildings and environments resulting from climate change can be potentially lethal. Development and alterations to the built environment to create safe and secure environments that reduce crime, fear of crime and anti-social behaviour will benefit all groups but particularly women, the elderly, LBGTQ+, faith and BAME groups. Policy Q16 shop fronts states that designs should have level entrances where possible, thereby recognising and benefitting disability, age and pregnancy and maternity protected groups.

Overall it is considered that all eleven places and neighbourhoods policies (Waterloo, Vauxhall, Brixton, Streatham, Clapham, Stockwell, West Norwood, Kennington/Oval, Herne Hill, Loughborough Junction and Upper Norwood/Crystal Palace) should result in positive impacts for their local communities and equalities groups. The policies were developed through the identification of priorities important to local people. The places and neighbourhoods policies highlight opportunities for sustainable growth in each centre and where such local growth needs to be supported by transport and other infrastructure. The purpose of each policy is to take a neighbourhood based approach and plan positively to create places that foster local community identity and inclusion. Many policies identify specific public transport and public realm improvement projects and that will have positive impacts on a number of protected equality groups. Similarly policies set out detail to support growth in employment, affordable workspace, housing (including affordable housing) cultural uses, for example.

#### Places and Neighbourhoods

Would you assess the impact as positive, adverse, neutral? Do you have any uncertainty about the impact of your proposal? Is there a likelihood that some people will more impacted than others? Can you describe the ways in which they will be affected? How might this change affect our 'general duty'?

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### Q3a. How do you plan to promote and deliver any positive impacts of the proposal?

The DRLLP PSV 2020 will be promoted through the examination process which is undertaken in a public environment where anyone can make a formal written submission and speak at the hearing. Adoption of the Revised Local Plan will be promoted via the website (like all aspects of the planning service), with physical copies made available in libraries and the Town Hall. This is in line with the council's Statement of Community Involvement 2015.

Delivery of the DRLLP PSV 2020 (once adopted) will be through the planning application decision-making process (there are approximately 2,500 planning decisions in Lambeth each year) and through publishing data on what is actually being delivered through statutory duty monitoring reports. The DRLLP PSV 2020 includes a series of monitoring indicators covering the range of policy topics, such as overall housing delivery, affordable housing, specialist older persons housing, student bedspaces, gypsy and traveller pitches, affordable workspace, office floorspace, industrial land, visitor accommodation, open space and green infrastructure, transport and air quality. These monitoring indicators help determine how policies are working in practice and how successful they are, and this information will be used to consider whether policies may need to change in any future review. All planning policy monitoring data is published [on-line](#). Data on housing and employment also inputs into corporate KPIs.

How might the principles of fairness, equality of opportunity and positive relationships be further promoted as a consequence of this proposal? How do you propose to measure your positive outcomes and the benefits outlined to find out if these have been achieved?

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### Q3b How do you plan to address and mitigate any negative impacts of the proposal?

The SA work has resulted in a number of SA recommendations to either improve positive impacts or avoid/mitigate negative impacts in implementing the DRLLP PSV 2020. See Section 5 of the Sustainability Appraisal on DRLLP PSV 2020 for more information.

The Equality Act 2010 places a duty on officers and the council to have due regard to the impact our policies and decisions have on people with 'protected characteristics': sex, race, disability, sexual orientation, age, religion or belief, gender reassignment, pregnancy, and maternity, and to ensure no negative equalities impacts from planning decisions. Accordingly the Equality Duty supports good decision-making to ensure policies and services are appropriate and accessible to all and meet different people's needs and that equality considerations in all stages of policy making process has been made. It is considered preparation of the DRLLP PSV 2020 has met this duty.

Development plan policies are designed to ensure negative impacts are mitigated, either by amending the design of developments and/or through planning obligations. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as statutory tests in the Community Infrastructure Levy Regulations 2010 and as policy tests in the National Planning Policy Framework. DRLLP PSV Policy D4 sets out that planning obligations will be sought to secure affordable housing and to ensure that development proposals provide or fund local improvements to mitigate the impact of development and/or additional facilities and requirements made necessary by the development. This may include:

- on-site provision of infrastructure, whether transport, education, health, libraries, sport and leisure, waste, emergency services and cultural and community provision;
- local public realm improvements including streetscape, local public open space, play facilities and community safety;
- mitigation of impacts on and/or enhancement of heritage assets;
- mitigation of noise impacts;
- highways and traffic works;
- public transport improvements;
- local walking and cycling improvements;
- car clubs, parking restrictions, and travel plans;
- hotel and visitor management measures;
- access to employment opportunities created by the development by securing employment premises and learning and skills initiatives;
- access for local businesses to supply chain opportunities created by the development;
- small and flexible office space, affordable workspace and affordable retail units;
- maintenance and management arrangements;
- town centre management;
- public access to on-site facilities;
- low carbon and renewable energy, including carbon offset;
- sustainable drainage systems and flood risk mitigation;
- connection to, and support of, quality broadband and other telecommunication and information technology support networks;
- green infrastructure
- local food production and growing; and
- other sustainability measures, including mitigation of impacts on and/or enhancement of biodiversity and wildlife habitats.

Community Infrastructure Levy (CIL) contributions are also collected from new development to contribute towards the cost of delivering the infrastructure required to support growth and development in the borough.

What impact has this evidence had on what you are proposing? What can you do differently that might lessen the impact on people within the timeframes i.e. development-implementation? Who can help you to develop these solutions?

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### Q4. How will you review/evaluate your proposal, mitigating actions and/or

### benefits? Who will be responsible for this?

The council is required to review its Local Plan every five years. This provides an opportunity to look again at the implementation of new or revised policies and assess their effectiveness. There are monitoring indicators in the Plan that help determine how policies are working in practice and how successful they are, and this information will be used to consider whether policies may need to change during the next review. The council is also required to produce an annual monitoring report. These brings together data in other annual monitoring reports that are prepared including housing development pipeline report (includes completions and affordable housing), student accommodation assessment, hotel and visitor accommodation and commercial development pipeline report. Data is published on-line and reported internally to the lead Cabinet Member. Data on housing and employment also inputs into corporate KPIs.

The team responsible for section 106 agreements (planning obligations) and CIL reports annually on the collection and spend of financial contributions received.

The Local Plan monitoring indicators measure performance on matters that are directly and specifically influenced by decision-making on planning applications. Given the anticipated positive impact of Local Plan policies on some protected characteristics groups, it is expected that positive performance against Local Plan indicators will therefore also have an indirect positive effect on more general statistics about protected characteristics groups collected/reported by other council service areas. When reviews of the Local Plan take place, this wider information about protected characteristics groups will be considered in addition to more narrow performance against the specific Local Plan indicators.

In addition to monitoring data, subsequent reviews of Local Plan policy will be informed by other forms of evidence and any changes to the national and/or regional planning policy context.

The Planning Strategy and Policy team within Planning, Transport and Development (Neighbourhoods and Growth) is responsible for reviewing/evaluating the Local Plan and collating monitoring data.

Who will you be accountable to for the above actions/outcome? How will those responsible know these actions have worked? What performance indicators will you use to demonstrate this? Are there any other forms of evidence you can use to support this assessment of their effectiveness?

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### Section to be completed by Sponsor/Director/Head of Service

Outcome of equality impact assessment

- No adverse impact, no change required
- Low adverse impact, minor adjustment required
- Significant adverse impact, further action required
- Significant impact identified unable to mitigate fully
- Unlawful in/direct discrimination, stop and rethink

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### Comments from Sponsor/Director/Head of Service

Overall, the proposed policies in the DRLLP PSV are expected to have a significant positive impact on groups with protected characteristics, particularly those within more disadvantaged socio-economic groups, some BAME people, some disabled people and some younger and older people. While the DRLLP PSV is a borough-wide document, it contains a strong neighbourhood focus based on positive planning through the places and neighbourhoods policies. These policies embody a recognition that place-shaping is best addressed through a neighbourhood approach. Where development has potential for harmful impacts, the proposed policies include measures and mechanisms to mitigate these impacts.

Submit for approval

Resubmit

## Executive Approval

Approved

### Attachments

[LPR issues consultation EIA FINAL.docx](#)

[191209 Draft Local Plan Review FINAL for approval.docx](#)

Close