

Equality Impact Assessment		Please enter responses below in the right hand columns
Date	September 2017	
Sign-off path for EIA (please add/delete as applicable) If you are conducting an EIA on a Cabinet decision, it should come to Corporate EIA panel for sign off.	Corporate EIA Panel	
Title of Project, business area, policy/strategy	Lambeth Local Plan Review - Issues Consultation	
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London Borough of Lambeth Equality Impact Assessment		Please enter responses below in the right hand columns.
1.0 Introduction		
1.1 Business activity aims and intentions <i>In brief explain the aims of your proposal/project/service, why is it needed? Who is it aimed at? What is the</i>	<u>Introduction</u> This is an Equalities Impact Assessment of the consultation and engagement plan for the Lambeth Local Plan Review issues consultation starting in October 2017. The Lambeth Local Plan is part of the statutory development plan for Lambeth, alongside the Mayor of London's London Plan. Together these documents set the policy context for	

<p><i>intended outcome? What are the links to the political vision, and outcomes?</i></p>	<p>growth and development in the borough and provide the basis for determining planning applications.</p> <p>The current Lambeth Local Plan was adopted by the Council in September 2015, following a statutory process of preparation and examination. The Inspector for the Local Plan examination found the Plan sound subject to early review.</p> <p>The Lambeth Local Plan needs to be reviewed to reflect changes to national and regional planning policy as well as changing circumstances in the borough and new evidence. Some aspects of the Plan remain up-to-date and do not need to change: the review will therefore be partial.</p> <p>It is considered that the overall vision and strategic approach in the existing Lambeth Local Plan 2015 are consistent with the three priorities of the Lambeth Borough Plan: inclusive growth, reducing inequality and strong and sustainable neighbourhoods. However, some of the policies need to be updated to take account of changing circumstances and new evidence. The review will therefore be partial (those parts of the existing Local Plan that will not be subject to change underwent an EIA as part of the Sustainability Appraisal which supports the existing Local Plan).</p> <p>The process of reviewing the Local Plan involves a number of stages required by the regulations governing plan preparation. In summary, these include:</p> <ul style="list-style-type: none"> • Public consultation on the matters to be covered in the review (Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012). In practice, this is often split into two stages: consultation on issues followed by consultation on a draft version of the Plan. • Consideration of representations received and revisions to the draft document. • Agreement by the local planning authority of the version it intends to submit for examination ('proposed submission version').
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- Publication of the proposed submission version of the Plan, along with an open invitation to submit representations (Regulations 19 and 20).
- Submission of the proposed Plan and supporting documents to the Secretary of State, along with any representations received at pre-submission publication.
- Independent examination by a planning inspector on behalf of the Secretary of State; this involves an assessment against legal and procedural requirements and consideration of the 'soundness' of the plan against four tests.
- Assuming the Plan is found to be 'sound' by the inspector, adoption of the Plan by the local planning authority.

The initial stage of statutory consultation (under Regulation 18 of the 2012 Regulations) will be split into two rounds. The first round will be consultation on issues for the review (referred to in this report as 'Regulation 18 part 1'). This will highlight and seek views on issues and alternatives for the more fundamental policy changes as well as proposed new areas of policy, but will not include detailed policy wording. There will be an opportunity for consultees to say whether they think the Council has identified the right issues for the review.

The second round of consultation will be on a Draft Revised Local Plan (referred to in this report as 'Regulation 18 part 2'). This will show the proposed wording changes for the more significant areas of policy, including any new proposed policies, and will also include any proposed minor wording changes needed for clarification.

The first round of public consultation (Local Plan Review issues consultation) is proposed to start in October 2017 and last for eight weeks. This will explore the key issues to be considered in the partial review, which are: housing growth and infrastructure; affordable housing; housing for older people; business and jobs; town centres; hotels; waste; air quality; and transport. These issues will be explored through a series of topic papers and questions, with links to further evidence where relevant.

The consultation and engagement approach for this initial round of issues consultation is set out in the attached Consultation and Engagement Plan.

Respondents to the consultation will be asked to complete optional demographic questions. This will enable analysis of the consultation findings by equality characteristics.

EIA of the Local Plan Review policies themselves will be undertaken and reported separately through the statutory sustainability appraisal process for local plan preparation, which tests emerging policies against a range of socio-economic objectives, including equality. The Sustainability Appraisal is an on-going process during the Local Plan preparation process. The timetable for the Local Plan Review is set out in the table below.

Stage	Date	
Consultation on issues for the review (Regulation 18 part 1)	October-December 2017 (8 weeks)	
Consultation on Draft Revised Local Plan (Regulation 18 part 2)	Summer 2018	
Pre-submission publication (Regulations 19 and 20)	Early 2019	
Submission	Spring 2019	
Examination hearing	Summer 2019	
Inspector's report	Winter 2019	
Adoption	Early 2020	

2.0 Analysing your equalities evidence

2.1 Evidence

Protected characteristics and local equality characteristics	Impact analysis For each characteristic please indicate the type of impact (i.e. positive, negative, positive and negative, none, or unknown), and:
Race	<p>The State of the Borough 2016 report states that around 40% of Lambeth’s population is White with a UK background. 25% of the population are Black. Lambeth has a small Asian population compared to other London boroughs, with 7.8% of Lambeth residents having an Asian background. The Residents Survey found that 68% of Asian British residents are most likely to agree that they can influence local decisions. Generally, BME residents more commonly agree than non-BME residents that they can influence local decisions. The Residents Survey 2016 also reports that 14% of Black Caribbean residents who were surveyed do not have access to the internet.</p> <p>It is acknowledged that some minority ethnic groups are less likely to participate in a planning consultation or have a knowledge of the planning system. This is because they may have arrived more recently in this country and/or they may belong to more disadvantaged socio-economic groups, which can present barriers to participation.</p> <p>To help address this, the online survey has been designed in a way that can be accessed by anyone at any time on a smart phone or tablet, which may be easier than having to attend events or meetings. Summary sheets linked to the online survey will provide people with simplified information to help them participate, regardless of their existing knowledge of the planning system. Promotional material for the consultation will be placed in locations that those in more disadvantaged socio-economic groups may be likely to visit, such as community centres, customer centres, schools and doctors’ surgeries. Groups that are less likely to engage may prefer to participate in an online survey than attend a consultation event or meeting, and they may be more likely to monitor social media rather than traditional Council publications, although it is acknowledged that some groups do not have access to the internet or a smartphone.</p> <p>It is hoped that Ward councillors will play a key role in helping to promote the consultation and providing support in responding to those who need it, particularly to those groups who</p>

	do not have access to the internet. A briefing session for Ward councillors will be held ahead of the start of the consultation.
Gender	<p>The State of the Borough 2016 report states that there are roughly equal numbers of male or female residents in Lambeth, with around 157,000 of each. Planning policy and planning decisions can have different impacts on men and women as differences can exist in the way men and women access housing and employment and use public spaces, public transport and community facilities. It is therefore important that the Issues consultation seeks the views of both men and women.</p> <p>However, a person's gender is unlikely significantly to influence whether or not they can access the online survey. It has been designed in a way that can be accessed by anyone at any time on a smart phone or tablet, which may be easier for some women with childcare responsibilities than having to attend events or meetings. The use of a range of publicity methods will also help raise awareness of the consultation to both men and women. For example, the use of social media plus posters/leaflet in locations such as schools, GP surgeries, libraries and leisure centres will help raise awareness of the consultation amongst both men and women, but may be particularly helpful to women with caring responsibilities.</p>
Gender re-assignment	<p>The State of the Borough 2016 states that it has been estimated that there are 20 transgender people per 100,000 people in the UK which suggests roughly 50-60 people in Lambeth, but there is limited local data available.</p> <p>In 2011, the council commissioned an ethnographic research study of transgender people living, working and using public spaces in Lambeth. The objective of the research was to better understand the needs of this group of residents and how these are being met by public services. One recommendation of this study related to whether it is necessary for council customers to declare their gender on the web and on paper forms.</p> <p>The impact of the Issues consultation on the gender re-assignment protected characteristic is not known. There is not enough evidence to assess whether this group would experience particular barriers finding out about the consultation or accessing the survey and related</p>

	<p>information. Publicity will be disseminated through existing networks, including LGBT+ networks. Whilst the survey will include demographic questions to enable segmented analysis of the responses, these will not be requirement. The gender question will include an option for those who do not wish to identify with either 'male' or 'female'.</p>
<p>Disability</p>	<p>The State of the Borough 2016 reports that about 37,000 people in Lambeth have their day to day activities limited by a long term illness or disability. 7% of adults classify themselves as having a long term limiting illness or infirmity and 5% say they have a disability. Projections from the Department for Health suggests that there are 19,000 working age residents who have a moderate or severe physical disability in the borough and 37,600 who have a common mental disorder. The Residents Survey 2016 reports 58% of those with a long term illness or disability are more likely to agree they can influence decisions in the local area. However it found that 26% of disabled residents who were surveyed do not have access to the internet.</p> <p>The Lambeth Equality Commission identified evidence that showed disabled people face additional barriers that affect their ability to participate in public life. The recommendations of the Commission set out the steps that need to be taken to ensure a better level of understanding and awareness of disability issues so that disabled people can have their voices and heard and participate on the same terms as non-disabled people. It recommends that the Council should develop its approach to consultation and engagement so that the views and needs of under-represented communities are better reflected in outcomes from these. It further recommends that the Council should work with local disabled people's organisations to identify local good practice in increasing participation amongst disabled people and share this across the borough. The Council should review its engagement practices to support disabled people to participate in local consultations and decision-making and should ensure that information on key issues affecting disabled residents is available in a wide range of accessible formats.</p> <p>In 2016, the government's Women and Equalities Committee launched an inquiry on Disability and the built environment and focusses on the accessibility of homes, buildings and public spaces. A report published by the committee sets out that, whilst there were</p>

examples of where the involvement of disabled people had worked well, the predominant message was that disabled people did not feel that they were being effectively involved in local decision-making. This was in part due to the methods being used to engage. The inquiry recommended that best practice guidance be produced by the Department for Communities and Local Government in partnership with disabled people's organisation to provide guidance for local authorities and built environment professionals on how and when to involve disabled people in the process which lead to the creation of built or external environments.

For these reasons, this consultation has sought to include a particular focus on enabling disabled people in Lambeth to participate. To assess suitable methods, officers sought the views of organisations working within 'We are 336' (the hub for disabled organisations in Lambeth) to seek specific advice about formats and techniques that can be used to help disabled people access the survey and to find ways to feed their views into the consultation. These discussions concluded that supplementary methods were needed in order to seek the views of stakeholders with a learning disability or those who are blind or visually impaired. which are set out below.

During the 8 week consultation period, a consultation session will be held with the Lambeth Learning Disability Assembly Forum. This will use accessible material to seek their views on key topics of interest, such as transport.

During the development of the online survey, a testing exercise was undertaken with South East London Vision to test its accessibility. This exercise suggested a number of changes to the online survey to improve accessibility for stakeholders who need to use screen readers and other accessibility software. These changes have been included into the survey and further testing has been undertaken with members of the council's sensory team. In addition to improvements to the online survey, the officers will work with South East London Vision to publicise the consultation and encourage their stakeholders to take part. This will include attending the Lambeth Vision Group meeting to explain and publicise the consultation prior to it starting. This will assist in raising awareness of the online survey to those stakeholders who might take longer to complete it. South East London Vision will also

	<p>work with their volunteers to assist their stakeholders to participate in completing the survey.</p> <p>It is acknowledged that these measures will not be sufficient to address all the needs of disabled people in Lambeth but that, within the resources available for the consultation, they may assist in starting to improve on previous practice and help pilot approaches for future Council consultations.</p>
<p>Age</p>	<p>Lambeth has a relatively young age profile. The State of the Borough 2016 identifies that over half the population is younger working aged (20-44 years) and there are relatively few children and young people under 20. Lambeth has the highest number of people aged 25-29 of any London borough. The borough has a small proportion of people aged 60+, but over time the proportion of older people will grow. The Residents Survey 2016 reports that 57% of residents who are retired are more likely to agree they can influence decisions affecting their local area. It also found that 53% of retired and older people do not access the internet. However, Ofcom's Adults' media use and attitudes report 2017 found that nationwide, 51% of those aged 65-71 now have tablets compared to 39% in 2015. Smartphone use in this aged group has doubled since 2013. Almost half of internet users in this age group now have a social media profile.</p> <p>A recommendation from the Equality Commission is that the council should support community organisations with young people to encourage participation in public life.</p> <p>Young people may be less likely to engage with a Council consultation or have an understanding of the planning system. The new Local Plan will set the planning framework for the future of Lambeth of the next 15 years. This means it is important to seek the views of young people in the borough and to encourage them to participate in completing the survey by using targeted publicity methods.</p> <p>Schools in the borough will be asked to include information about the survey in their newsletters to encourage both pupils and parents to participate. Posters will also be made available in locations where young people may attend, such as community centres and</p>

	<p>leisure centres. For secondary schools, officers will ask selected schools to consider using the consultation survey as the basis of a classroom or tutor time activity, particularly relevant to young people studying humanities subjects like Geography, Citizenship or Sociology. This is being arranged with Lambeth School Services.</p> <p>Details of the consultation will be shared on the council’s social media channels. It is hoped that this method of publicity will encourage young people to complete the online survey when they are using social media. The details of the consultation will also be shared with Young Lambeth Co-op and Lambeth Youth Council and they will be encouraged to share this with their networks and on their own social media channels to target a range of groups and young people.</p> <p>It is acknowledged that there are barriers for some older people in using and accessing the internet, which may impact on their ability to participate in the online survey. To help address this, the consultation will encourage people who are less confident using computers to seek help in libraries. In addition, the consultation will be promoted through posters and leaflets in locations commonly used by older people, such as day centres and doctors’ surgeries.</p> <p>It is therefore considered that the Issues consultation may have both a positive and negative impact on age. Whilst some may be disadvantaged in accessing the information, it is hoped that the measures outlined above will help to mitigate this – and in so doing, awareness of planning and built environment will be raised to be the benefit of those participating.</p>
<p>Sexual orientation</p>	<p>The State of the Borough 2016 states that regional data suggests that around 3.5% of people in London are Lesbian, Gay, Bisexual and Transgender. Recent health estimates suggest that Lambeth has one of the largest populations of gay men in the UK.</p> <p>There is not enough evidence about the participation of different sexual orientations in planning consultations to know whether the Local Plan review consultation will have a positive or negative impact on this protected characteristic. The online survey has been designed to be answered by anyone at any-time, so there may be no specific barriers in this</p>

	<p>case. LGBT+ networks in the borough will be used to help disseminate information about the consultation.</p>
Religion and belief	<p>According to the State of the Borough 2016, over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents by religion.</p> <p>It is acknowledged that some religious and faith groups may be less likely to participate in a planning consultation or have a knowledge of the planning system. This would tend to be for the same reasons set out under the Race protected characteristic, because many of those with a religious affiliation in Lambeth are also members of minority ethnic groups. Some may have arrived more recently in this country and/or they may belong to more disadvantaged socio-economic groups, which can present barriers to participation.</p> <p>To help address this, the online survey has been designed in a way that can be accessed by anyone at any time on a smart phone or tablet, which may be easier than having to attend events or meetings. Summary sheets linked to the online survey will provide people with simplified information to help them participate, regardless of their existing knowledge of the planning system. Promotional material for the consultation will be placed in locations that those in more disadvantaged socio-economic groups may be likely to visit, such as community centres, customer centres, schools and doctors' surgeries. The council's network of voluntary and community sector contacts will be asked to distribute posters to their members. Groups that are less likely to engage may prefer to participate in an online survey than attend a consultation event or meeting, and they may be more likely to monitor social media rather than traditional Council publications.</p> <p>It is hoped that Ward councillors will play a key role in helping to promote the consultation and providing support in responding to those who need it. A briefing session for Ward councillors will be held ahead of the start of the consultation.</p>
Pregnancy and maternity	<p>The State of the Borough 2016 states that there have been between 4,000 and 5,000 births in Lambeth every year in recent decades and in 2013/14 there were 4,571. There are an estimated 6,000 to 9,000 Lambeth residents pregnant or on maternity leave at any one time.</p>

	<p>Being pregnant or caring for young children could present a barrier to participating in public events and meetings. In this case, the primary consultation method is an on-line survey, which has been designed to be accessed by anyone at any time on a smart phone or tablet. This should be easier for women with caring responsibilities, because they can choose how, when and where to take part. In addition, the distribution of posters and leaflets publicising the consultation in GP surgeries/health centres, community centres and schools will make it more likely that pregnant women and those with young children will find out about it. As schools are going to be asked to publicise the consultation through their newsletters and websites, stakeholders with children may also know about the consultation through this publicity method.</p> <p>It is hoped that Ward councillors will play a key role in helping to promote the consultation and providing support in responding to those who need it. A briefing session for Ward councillors will be held ahead of the start of the consultation. They may wish to promote the consultation by networking at toddler groups or in school playgrounds at pick-up time, for example.</p>
Marriage and civil partnership	<p>The 2011 Census recorded that in Lambeth there were 144,966 residents who were single, 65,017 were married and 2,060 were in a registered same-sex civil partnership. 9,524 residents were separated, 18,082 were divorced and 8,651 were widowed.</p> <p>It is not known whether this consultation will have a positive or negative effect on this protected characteristic – there is insufficient information to assess this.</p>
Socio-economic factors	<p>The Lambeth Equality Commission saw evidence that economically and socially disadvantaged groups are less likely to participate in public life. As a result, these groups have less voice and influence and are also less likely to experience the well-evidenced benefits of participation, particularly on health and wellbeing. It is also acknowledged that some stakeholder groups are less likely to have an understanding of the planning system and are less likely to participate in a planning consultation.</p>

	<p>It is hoped that the online survey and publicity methods selected will have a positive impact on socio-economic factors and that the methods used will help enable economically and socially disadvantaged groups to participate. This includes using publicity methods that are as far reaching as possible and encourage local community groups and networks to publicise the consultation to their members. The ‘summary information sheets’ will provide stakeholders with the key definitions and summaries of key evidence bases so they have the necessary information they need to participate. Plain English has also been used as far as possible.</p> <p>It is hoped that Ward councillors will play a key role in helping to promote the consultation and providing support in responding to those who need it. A briefing session for Ward councillors will be held ahead of the start of the consultation.</p>
Language	<p>Around 150 different languages are spoken by families in the borough. Around 6% of the population speak a main language other than English, mostly EU and African languages. The language used in planning documents and planning consultations is often complex and technical and can be difficult for stakeholders to understand if they do not have an understanding of the planning system or English is not their main language. In order to improve the accessibility of the online survey and topics, each of the questions and supporting information has been written in plain English as much as possible.</p> <p>As the primary consultation method is online, stakeholders will be able to use online translation software if they require assistance. They can also make a request to the Council for the information be translated into a different language free of charge.</p> <p>It is hoped that Ward councillors will play a key role in helping to promote the consultation and providing support in responding to those who need it. This will include Ward councillors who are members and/or native speakers of minority languages in the borough – and who may therefore be able to encourage participation and help explain and translate the materials within those communities. A briefing session for Ward councillors will be held ahead of the start of the consultation.</p>

<p>Health</p>	<p>The State of the Borough report states that about 37,000 people in Lambeth have their day to day activities limited by a long term illness or disability. About 60% of people with a limiting health condition are aged over 50.</p> <p>Planning and the built environment has a big impact on people’s health and wellbeing and so it is important that the Issues consultation does not have a negative impact on health. The consultation needs to seek the views of stakeholders regardless of their health and it is important to seek the views of stakeholders where planning may have a greater impact on their health, such as older and disabled people.</p> <p>Stakeholders with poor health may be more likely to participate in an online survey than attend a consultation event. It has been designed to be accessed by anyone at any time on a smart phone or tablet. The consultation will be publicised through health networks and posters in GP surgeries and health centres.</p> <p>A presentation on the Issues consultation will be given to the Council’s Health and Wellbeing Board to seek their views on the issues raised.</p> <p>The Issues consultation will seek specific views on air quality, which has a big impact on health, and a consultation session will be held with the Air Quality Action Plan steering views to seek their views on how the Local Plan should address poor air quality.</p> <p>Finally, as set out in the analysis of the disability protected characteristic, a number of methods are being used to seek the views of disabled stakeholders to ensure the consultation is accessible as possible.</p>
<p>2.2 Gaps in evidence base <i>What gaps in information have you identified from your analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are</i></p>	<p>For some of the protected characteristics, there is little evidence of the relationship between that characteristic and the likelihood of participating in a public consultation about planning issues. Demographic questions will be included at the end of the surveys to collect relevant demographic information for each issue. This will enable analysis of the consultation findings by relevant demographic characteristics, which may help to fill some of the gaps in evidence to inform future rounds of consultation on the Local Plan Review and</p>

<p><i>unable to fill in the gaps please state this clearly with justification.</i></p>	<p>future Council consultations on other matters. This analysis will also help to understand the particular views of different social groups on the planning issues under discussion.</p>
<p>3.0 Consultation, Involvement and Coproduction</p>	
<p>3.1 Coproduction, involvement and consultation <i>Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?</i></p>	<p>The key stakeholders are set out in the attached Consultation and Engagement Plan, along with the proposed consultation and publicity methods. Section 2 of this EIA sets out the methods that will be used to targeted groups with specific protected characteristics. Further analysis of who responded to the consultation and their feedback will take place once the consultation exercise has been completed.</p> <p>During the design of the consultation, advice was sought from key stakeholders working with disabled people about how to make the consultation and publicity as accessible as possible. This takes account of the recommendation from the Equalities Commission which states the Council should ensure that as more services and processes are digitised, residents who might need additional support (such as disabled residents) are involved in the designing and testing of systems and technology.</p>
<p>3.2 Gaps in coproduction, consultation and involvement <i>What gaps in consultation and involvement and coproduction have you identified (set out any gaps as they relate to specific equality groups)? Please describe where more consultation, involvement and/or coproduction is required and set out how you intend to undertake it. If you do not intend to undertake it, please set out your justification.</i></p>	<p>Prior to the consultation it is not possible to determine whether there are any gaps in the selected consultation and publicity methods. The consultation is inevitably limited by the resources available to carry it out: every effort has been made within the resources available to take account of the needs of the different protected characteristics. Following the consultation, analysis will take place of responses received. This will include an analysis of which stakeholders responded, based on the information provided from the demographic questions. This will identify whether any alternative consultation methods are needed to target specific groups or protected characteristics during the next stage of consultation on the Draft Local Plan.</p>

4.0 Conclusions, justification and action	
<p>4.1 Conclusions and justification <i>What are the main conclusions of this EIA? What, if any, disproportionate negative or positive equality impacts did you identify at 2.1? On what grounds do you justify them and how will they be mitigated?</i></p>	<p>Overall it is considered that this type of Council consultation has the potential to have negative impacts on some of the protected characteristics, particularly those within more disadvantaged socio-economic groups, some disabled people, and some younger and older people. For other characteristics, like marital status and sexual orientation, the potential impacts are less clear to determine.</p> <p>The consultation and publicity methods have been designed based on an analysis of key stakeholders and their potential barriers, where known; and mitigation measures have been included to help address these. These include use of an online survey designed to be accessible by anyone at anytime, combined with wide ranging publicity in key locations, online support in libraries, encouragement to disseminate information through networks and community groups, and support from Ward councillors within their constituencies.</p> <p>As a result, it is hoped that the consultation may in fact have an overall positive impact on disabled and young people, because some in these groups may find out more about the planning system, the issues that affect them and how to influence them.</p>
4.2 Equality Action plan	
<i>Please list the equality issue/s identified through the evidence and the mitigating action to be taken. Please also detail the date when the action will be taken and the name and job title of the responsible officer.</i>	
Equality Issue	Mitigating actions
It is unknown exactly which stakeholders will respond during the consultation and whether all of the stakeholders have been targeted.	Analysis will be undertaken of both the responses received and the demographic information collected to give a detailed picture of who responded and whether other methods are required to target specific stakeholder for consultation on the Draft Local Plan be published in 2018.
5.0 Publishing your results	
The results of your EIA must be published. Once the business activity has been implemented the EIA must be periodically reviewed to ensure your decision/change had the anticipated impact and the actions set out at 4.2 are still appropriate.	

EIA publishing date	2 October 2017
EIA review date	Early 2018
Assessment sign off (name/job title):	

All completed and signed-off EIAs must be submitted to equalities@lambeth.gov.uk for publication on Lambeth's website. Where possible, please anonymise your EIAs prior to submission (i.e. please remove any references to an officers' name, email and phone number).