

EQUALITY ANALYSIS PROFORMA

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Lambeth Local Plan Review – Draft Revised Local Plan October 2018

Q1.What is changing?

The Lambeth Local Plan was adopted in September 2015 and is one part of the statutory development plan for the borough, alongside the Mayor's London Plan and any adopted neighbourhood development plans. Under government planning policy, Local Plans must be reviewed and updated as required every five years. This means the reviewed Lambeth Local Plan must be adopted before September 2020. The review needs to take account of the new Borough Plan objectives, the new National Planning Policy Framework, the emerging new London Plan, new evidence and new development trends. The review must follow a statutory process that involves at least two rounds of public consultation and an independent examination process.

An initial round of public consultation on issues for the Local Plan review took place between October and December 2017. In October 2018 Cabinet is being asked to agree to the next round of public consultation on the Draft Revised Local Plan October 2018. The Draft Revised Local Plan October 2018 will show the proposed changes to current Local Plan policy alongside cross-references to new London Plan policy that will be implemented alongside it. The Draft Revised Local Plan October 2018 will be published alongside supporting evidence and a Sustainability Appraisal, which includes assessment of the emerging policies against 19 environmental, economic and social objectives.

After this, the next step will be a decision to proceed to pre-submission publication and submission to government for examination, anticipated in autumn 2019. An examination hearing is anticipated in early 2020, followed by receipt of the Inspector's report and adoption later in 2020.

Chapters for review of the Local Plan 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 is set out in Appendix 3 of the Cabinet Report 15 October 2018.

Q1.b Who will be involved in approving this decision?

The decision will be made by Cabinet - Lead Member Cllr Matthew Bennett, Cabinet Member for Planning and Investment and the following senior management officers: Strategic Director Sue Foster, Neighbourhoods and Growth; Director Sandra Roebuck, Growth Planning and Employment; and Head of Service Rob Bristow, Assistant Director Planning, Transport and Development.

Q2.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.

An EIA was previously undertaken on the consultation and engagement plan for the Issues Consultation, which took place in October-December 2018. To assess potential equality impacts of the consultation approach, the key stakeholder groups for the consultation were assessed against three levels of engagement: 'active', 'aware and potentially active' and 'unengaged and harder to engage'. This mapping exercise helped to identify consultation and publicity methods suitable for different stakeholder groups.

The EIA of the consultation and engagement plan took account of the findings of Lambeth's Equality Commission and identified that people with some protected characteristics – or combinations of characteristic - are less likely to participate in a planning consultation or have knowledge of the planning system. The EIA concluded that the Issues Consultation 2017 had 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. The EIA identified that these groups faced particular barriers when participating in public consultations. These included:

- A lack of accessible formats to assist disabled people to access consultation material.
- A lack of understanding of the planning system and the benefits of engaging in public life, particularly for younger people and disadvantaged socio-economic groups.
- A lack of access or understanding of how to use the internet which may impact older people's ability to participate in online surveys.

Mitigation measures were then used to help address these impacts. These mitigation measures included:

- Seeking the advice of organisations working within 'We are 336' (the hub for disabled organisations in Lambeth) to seek specific advice about formats and techniques that could be used to help disabled people access the consultation, particularly those with learning disabilities or those who are blind or visually impaired.
- Designing an online survey that could be used by stakeholders at any time on a computer, tablet or smartphone, rather than requiring people to attend consultation events as some groups are less comfortable with attending a consultation event or meeting.
- Undertaking a testing exercise with South East London Vision to test the accessibility of the online surveys for those who use screen readers and other accessibility software.
- Attending a Lambeth Vision group meeting to explain and publicise the consultation prior to it starting in order to raise awareness of the online surveys to those stakeholders who might take longer to complete them.
- Holding a consultation session with Lambeth Learning Disability Assembly Forum using accessible material to seek views on transport and town centres.

- Encouraging existing networks and community groups to publicise the consultation to their members.
- Requesting that secondary schools use the surveys as the basis for classroom and tutor group activities to target young people.
- Placing promotional posters in locations where more disadvantaged socio-economic groups may be likely to visit, such as community centres, customer centres, schools, doctors' surgeries, libraries and leisure centres.
- Publicising the consultation on social media to target groups who do not engage with traditional forms of media produced by the council.
- Sharing the details with Young Lambeth Co-op and Lambeth Youth Council and encouraging them to share details of the consultation with their networks in order to target young people.
- Producing 'summary information sheets' that provided stakeholders with key definitions and summaries of key evidence bases need to participate in the online surveys, using plain English as far as possible.

Stakeholders could opt to provide equalities information at the end of each online survey:

- How stakeholders heard about the consultation
- What type of stakeholder they were
- Postcode
- Age
- Whether or not the stakeholder, or anyone they lived with, had a disability
- Ethnicity
- Gender

The Issues Consultation Report October 2018 sets out detailed analysis of all of the consultation responses received and of the equalities information submitted. A total of 1,309 responses were received, of which 1,185 responses submitted using the online surveys and 124 responses submitted in writing via email or by post.

The Issues Consultation Report provides detailed analysis on the demographics of respondents for each of the online surveys. This analysis demonstrates that the majority of responses for each of the online surveys came from those who identified as being White British, not having a disability and as being over the age of 25. However, there were some differences between respondents for each of the online survey. For example, responses for the transport survey came from 19 different ethnicities, including from respondents who identified as being Mixed: White and Black Caribbean (1%), Black or Black British: Caribbean (2%), Asian or Asian British: Pakistani (1%) and Asian or Asian British: Indian (1%). This is compared to 11.5% of Lambeth residents being Black African, 8.8% being Black Caribbean, 1.5% being Indian and 1% being Bangladeshi (State of the Borough 2016). Responses from the Housing for Older People survey came from respondents from a range of ages, including respondents who identified as being between 65-74 years (32%) and 75-84 years (3%). This means that 35% of respondents for the Housing for Older People survey were over the aged over the age of 60 compared to the 11% of Lambeth residents who are over the age of 60 (State of the Borough 2016).

The Issues Consultation Report also demonstrates that some of the mitigation measures used were successful in promoting the consultation to a wide range of stakeholders. For example, 293 respondents heard about the consultation through social media, which was a method used to attempt to target groups who do not engage with the council's traditional forms of media and 128 respondents heard about the consultation via community groups or networks which were used to target a wide range of stakeholders. The consultation session with Lambeth Learning Disabilities Forum meant that stakeholders from

a range of organisations were able to participate in the consultation which included Lambeth Mental Health and Learning Disabilities Service, Lambeth College, Orchard Hill College, People First Lambeth, The Opportunities Project and Vosse Court. Past Lambeth consultations on planning policy documents have used a range of methods, including targeting through existing networks and, to a more limited extent, social media. However, this was the first time social media was used extensively to target specific groups and it was the first time specific sessions were held with disability groups. Overall these additional techniques were considered successful in helping to increase engagement among target groups and would be recommended for use again in similar types of consultation about planning or transport issues.

Particular issues were raised during the consultation in relation to those with protected characteristics. These included:

- Social rented units should only be provided for the most vulnerable, for example disabled people.
- Residents don't know who to go to for housing assistance should they become disabled.
- There is a lack of accessible housing and existing care homes should be protected.
- More support needs to be given those with disabilities, for example railings in Brockwell Park to help people access the pool or parking to help disabled or elderly people access taxis at night.
- Car trips are necessary for people with restricted mobility or with disabilities.
- Step-free access to public transport is important.
- New development in the borough should be car free except for disabled parking.
- Allowing developers to build new flats smaller than the minimum space standards will have a negative impact on younger people who will have to live in them, particularly when they want to start a family.
- Payday loan shops target the most vulnerable people or those with financial difficulties

Some of the issues raised cannot be addressed through planning and the Local Plan. These comments have been forwarded to the relevant council departments. The other comments have been addressed in the Draft Revised Local Plan October 2018 in the following ways:

- Requiring 70 per cent of new affordable housing units to be low cost rented homes allocated according to need in line with the council's allocation scheme. This will be Social Rent and London Affordable Rent.
- Housing that meets identified specific community needs will be protected unless it can be demonstrated that the accommodation is no longer needed and the new accommodation will instead meet another identified priority local need or the existing floorspace is adequately re-provided on-site or elsewhere in the borough.
- Requiring developments to support and enable improvements to public transport, including step free access at railway and underground stations.
- Requiring disabled car parking in line with the London Plan requirements.
- Ensuring that any schemes for large-scale purpose-built shared living meet both the requirements of the London Plan and Lambeth-specific requirements, including minimum space standards for each unit of at least 15m².
- Introducing a new policy to prevent concentrations of pay day loan shops and preventing any further pay day loan shops in Brixton, Streatham and West Norwood.

Consultation feedback summary sheets will also be available during the consultation which will inform stakeholders of what people said during the consultation, what our evidence says and what we are proposing to do in the Draft Revised Local Plan October 2018.

Consultation on the Draft Revised Lambeth Local Plan October 2018 gives stakeholders the opportunity to comment on policy wording in the Local Plan, which is a necessary part of the statutory process for plan preparation. Due to the nature of the consultation and the content of the Local Plan, some groups may find this consultation less easy to participate in than the Issues consultation, which asked high level questions on a range of topics. However, in order to seek views from a range of stakeholders, particularly ones with protected characteristics and harder to reach groups, the following steps will be used to promote the consultation and seek comments (devised through close working with the council's communications team):

- Emailing stakeholders on the planning policy consultation database to encourage them to take part.
- Encouraging existing networks and community groups to publicise the consultation to their members.
- Publishing the Draft Revised Lambeth Local Plan on the council's website in full and by chapter so stakeholders can comment on the policies that interest them the most.
- Seeking comments using online survey forms that have been tested to ensure they are accessible and can be used by stakeholders at any time on a computer, tablet or smartphone. Comments will also be accepted by email and by post.
- Making hard copies of the Draft Revised Lambeth Local Plan available in the libraries for people to read.
- Publicising the consultation on the council's website, including a blog post on Love Lambeth.
- Publicising the consultation on social media to target groups who do not engage with traditional forms of media produced by the council.
- Producing ten short, colourful and easy-to-read 'consultation feedback sheets' that provide stakeholders with a summary of what people said during the Issues consultation (topic by topic), what the evidence base shows and the approach proposed in the Draft Revised Lambeth Local Plan October 2018, written in plain English as far as possible.

The Sustainability Appraisal of the Draft Revised Local Plan October 2018 will be published for comment alongside the draft plan document. It will include a 'non-technical summary' to make its content more accessible to readers.

Q2b. How will they be impacted by the change?

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 Draft Revised Local Plan October 2018. 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. Therefore, the final version of the Local Plan may be further altered, if appropriate, to maximise benefits, and minimise adverse effects as identified in the SA process.

The Draft Revised Local Plan October 2018 works alongside the Mayor's London Plan. For some policy areas, the council will apply and rely on London Plan policy, for example air quality. The emerging new London Plan policies have already been subject to equalities

impact assessment; this was incorporated into the Integrated Impact Assessment (IIA). 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](#).

The Sustainability Appraisal on the Draft Revised Local Plan October 2018 assesses how equality groups are likely to be impacted by the policies contained in the draft Plan. The Draft Revised Local Plan October 2018 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 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 benefit, different equality groups.

Overall, and taking into account SA recommendations to improve outcomes for equality groups, the SA analysis demonstrates generally positive impacts on the different protected groups in Lambeth. Table 1 below draws out some key summary analysis on equality groups from the SA work on some chapters of the Draft Revised Local Plan October 2018. For more detail, including baseline data on protected characteristics, and to review the whole SA analysis across all 19 sustainability objectives, please refer to Section 5 of the Sustainability Appraisal on the Draft Revised Local Plan October 2018 (which is being published for public consultation alongside the Draft Revised Local Plan October 2018).

Table 1: Key SA Objective 5 Equalities analysis of Local Plan chapters on equality groups.

Local Plan chapter	SA analysis
Housing	<p>Overall it is considered the housing policies should result in positive effects on equality groups. By increasing the supply and range of housing, including affordable housing of mixed tenures and size, and including accommodation for people with care and support needs; local plan housing provision will likely benefit all equalities groups, particularly those on low income levels and those requiring specialist housing through providing greater housing choice, tenures and availability. An increase in the availability and diversity of housing is likely to contribute to a reduction in overcrowding, which often occurs in less advantaged communities, particularly BME communities, and where renting dominates housing occupation, as it does in Lambeth. It is considered that policy H2 – affordable housing provides for a range of different income levels, from low cost rented homes (social rent/London affordable rent) and intermediate provision resulting in availability of more genuinely affordable housing for existing Lambeth residents.</p> <p>Net numbers of existing housing are safeguarded, unless the loss arises from creation of family sized units (which will benefit particular equality groups such as pregnancy and maternity, socio-economic and health groups (mitigating overcrowding)), or the proposal is for specialist non-self-contained accommodation to meet an identified local need, or hostels or HMOs (benefiting more vulnerable groups in Lambeth). To ensure mixed and balanced communities, a range of dwelling types, sizes and tenure is required from developments.</p>

	<p>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. New housing must conform to building control standards (includes ‘wheelchair users dwellings’ and ‘accessible and adaptable dwellings’), and policy H5 together with policy EN4, which would help to reduce issues such as homelessness, overcrowding and the risk of ill-health from damp or mould. Policy H8 makes provision for housing to meet specific community needs, benefits the more vulnerable groups of society (for example older persons, those with significant mental or physical health limitations), enabling Lambeth residents to remain in the borough.</p> <p>The policy on estate regeneration should result in significant positive effects for lower income Lambeth residents (minimum 50% affordable housing is required and in no circumstances will a net loss of affordable housing, or of social rented housing, be allowed in an estate regeneration scheme).</p>
<p>Economic Development, Retail and Town Centre Uses</p>	<p>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 address worklessness and poverty. 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. This includes education providers and organisations whose primary purpose is to support disadvantaged groups and tackling economic inequality through CDI related activity. 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 cultural and social values in the retail offer they provide. The policies contribute to increased access to localised employment which will benefit many equalities groups including women and parents in terms of offering a better work and domestic life balance.</p> <p>Policy ED7 also seeks to safeguard local shops, specialist shopping and markets to meet community needs, which will support different cultural retail sectors. Through this the policy will assist those who are less mobile, such as older people, disabled people and those on low incomes by having these services accessible and local thereby reducing need to travel far. Encouraging new residential development on appropriate sites in town centres and residential above ground floor 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 provided these are available on affordable terms. 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</p>

	<p>of home, thereby providing increased accessibility for low income groups, the elderly and people with mobility difficulties. The protection of existing indoor and street markets in the borough (policy ED12) provides continued opportunity for access to cheap, fresh and healthy food; supports market holders; and will likely result in positive outcomes for various equality groups.</p> <p>It is considered that policy ED15 on employment and skills should result in significant positive effects 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 worklessness, and poverty, including child poverty as well as provide opportunities for young people (but not limited to just the young) to get work through apprenticeships.</p>
Social Infrastructure	<p>Policies S1 and S2 support the protection and provision of social infrastructure which should impact positively on all residents, including poorer communities and equality groups. 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 that new social infrastructure should be made available to all residents irrespective of tenure. Similarly, proposals of 500 residential units or more should incorporate suitable childcare provision to meet additional need that cannot be met by existing facilities. New sports and leisure facilities provided within hotels and purpose-built student housing or shared living should be made available for community access during off-peak hours to groups of Lambeth residents and users identified by the council. To maximise positive effects on all groups in the local area, the SA recommends all new social infrastructure provision should be made available to all residents of the local area, rather than just those of the new development or those identified by the council.</p>
Transport	<p>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) 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, inconvenient, and unreliable or is felt to be unsafe so it is important the council lobbies for improvements in this regard as well. In so far as planning policy is able; it is considered the public transport policies seek to address most of these barriers. Improvements to public transport infrastructure should have positive impacts on equality groups especially if they link deprived neighbourhoods with areas of employment opportunity. There is a funding gap for the new station at Brixton and/or Loughborough Junction connecting to the London Overground so effects on equality groups and the wider population of Brixton are less likely to be</p>

	<p>maximised. The provision of safe and secure walking routes should have a positive impact on those who are more likely to suffer harassment in the streets, such as LGBT and BME groups. However, the whole journey experience needs to be accessible from leaving the house to arriving at the desired destination. 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. 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 safe and inclusive and prioritise those with particular mobility needs. This is commended and should result in more positive effects for those equality groups with accessibility needs. Clarification is sought on whether policy T2 applies to shared use of road space/public realm between pedestrians and vehicles as this shared use of space can be problematic for disabled users, elderly and young children/parents/carers.</p> <p>Disabled persons parking for new residential developments is set out in London Plan policy 6.1. For non-residential developments disabled persons parking should be provided for 5 per cent of the workforce, including where no general parking is provided. 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, disabled, older residents, and those on lower incomes / cannot afford to own and run a car. For those groups that require it, the draft Local Plan makes provision of mini-cabs, taxis and private hire vehicles which will help address accessibility and safe travel.</p>
<p>Environment and Green Infrastructure</p>	<p>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:</p> <ul style="list-style-type: none"> • 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

	<p>shading can make the environment cooler and reduce this risk.</p> <ul style="list-style-type: none"> • 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. <p>The policy also safeguards cemeteries and burial space in the borough, which will benefit particular faith groups.</p> <p>Policy EN2 on local food growing enables access to cheaper or even free fruit and vegetables which will benefit lower socio-economic groups, help reduce poverty and improve health and social inclusion / sense of community. Incorporation of community gardens, allotments, orchards are encouraged in major developments (not limited to residential) and therefore can benefit, for example, faith, disabled, young and older persons groups that use buildings or land in D1 or D2 use class.</p> <p>Fuel poverty can be addressed through policies EN3 and EN4 which will help reduce energy bills and benefit lower socio-economic groups, the elderly and other groups struggling to provide a warmer home. In terms of flood risk; the location of housing in relation to health hazards is an important consideration for those who are less able to deal with the impacts of flooding, for example older people, people with disabilities, and children and young people. A key issue will be assessing the potential vulnerability of occupiers in flood risk areas including arrangements for safe access and egress. 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 (for example very young, elderly, those with pre-existing health conditions).</p>
Quality of the Build Environment	<p>Policy Q1 inclusive environments is considered a key policy for positively impacting equality groups and is likely to result in significant positive impacts for disabled people, older people, other people with mobility constraints and children. It should be noted the Draft London Plan also places a significant emphasis on inclusive environments. The policy team may wish to clarify that these policies apply to all new development as well as the wider public realm. However, policy Q6 – urban design and public realm seeks to provide a public realm that is improved for all users, particularly through legibility, permeability and convenient access is for all users, and this offers positive benefits for equality groups. The SA recommends the policy team consider surface materials</p>

	<p>used in the public realm and their ease of use for different equality groups. For example some materials can become slippery in wet weather (negative impact for elderly, young, wheelchairs users and buggy users/carers) or are more difficult to move on (for example wheelchair users, buggy pushers). It is also recommended that the policy team is satisfied that policy seeks to ensure safe shared public realm spaces (where pedestrians and vehicles are supposed to use the same road space). The shared use of such space can be problematic for disabled users, elderly and young children/parents/carers. People with visual impairments should also be considered in public realm improvements and surface materials.</p> <p>Development and alterations to the built environment to create safe and secure environments that reduce crime, fear of crime and anti-social behaviour will benefit all groups but particularly women, the elderly, LBGT and BME groups.</p>
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Q3a. How do you plan to promote and deliver any positive impacts of the proposal?

The Draft Revised Local Plan October 2018 will be promoted through various rounds of consultation and through the examination process which is undertaken in a public environment where anyone can make 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.

As set out in section 2 a total of 1,309 responses were received, of which 1,185 responses submitted using the online surveys and 124 responses submitted in writing via email or by post. It also identified that some mitigation measures were successful in promoting the consultation to a wide range of stakeholders, including the use of social media, community groups or networks and working with the Lambeth Learning Disabilities Forum. The Draft Revised Local Plan October 2018 will be promoted through various rounds of consultation and through the examination process which is undertaken in a public environment where anyone can make 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.

Consultation on the Draft Revised Local Plan October 2018 will be publicised using the similar methods to the Issues consultation in 2017 in order to reach as many stakeholders as possible and officers in the planning policy team and working closely with the council's communications team on this. Promotional measures will include:

- Publishing the Draft Revised Local Plan October 2018 on the council's websites and having copies in libraries.
- Seeking comments via email, post and online surveys.
- Emailing all contacts on the planning policy database to notify them of the consultation.
- Producing 'consultation feedback sheets' which provide a summary of the consultation feedback, our evidence base and the approach proposed in the Draft Revised Local Plan October 2018. These use plain English as far as possible.
- Promotion of the consultation through existing bulletins and forums.
- A Love Lambeth blog post.

- Promotion of the council's social media channels including Facebook and Twitter.

Delivery of the Draft Revised Local Plan October 2018 will be through the planning application decision-making process and through publishing data on what is actually being delivered through statutory duty monitoring reports. The Draft Revised Local Plan October 2018 includes a series of monitoring indicators cover the range of policies 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 during the next review. All planning policy monitoring data is published [on-line](#). Data on housing and employment also inputs into corporate KPIs.

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 Draft Revised Local Plan October 2018. See Section 5 of the Sustainability Appraisal on Draft Revised Local Plan October 2018 for more information.

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. Draft Revised Local Plan October 2018 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, 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;
- 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;
- affordable retail units;

- maintenance and management arrangements;
- town centre management;
- public access to on-site facilities;
- low carbon and renewable energy;
- sustainable drainage systems;
- 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.

**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. Other annual monitoring reports that are prepared include 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) reports annually on the collection and spend of financial contributions received as planning obligations.

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.

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

Outcome of equality impact assessment

- No adverse impact, no change required X
- Low adverse impact, minor adjustment required
- Significant adverse impact, further action required

Unlawful in/direct discrimination, stop and rethink

Comments from Sponsor/Director/Head of Service

Overall, the proposed policies in the Draft Revised Lambeth Local Plan are expected to have a significant positive impact on groups with protected characteristics, particularly those within more disadvantaged socio-economic groups, some disabled people and some younger and older people. Where development has potential for harmful impacts, the proposed policies include measures and mechanisms to mitigate these impacts.

Sponsor/Director/Head of Service Sandra Roebuck, Director Planning, Investment and Growth